



Information Protection Policy PL-015

Author	L. Bowman
Approver	L. Bowman
Date Released (yyyy/mm/dd)	2017/11/21
Revision Number	1.0

Intent

At SPS West, we are committed to providing our clients, vendors and employees with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our clients, vendors and employees, protecting their personal information is one of our highest priorities.

While we have always respected our clients, vendors and employee's privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of the Alberta Personal Information Protection Act (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how Alberta businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our clients, vendors and employees of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting clients', vendors' and employees' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our clients', vendors' and employees' personal information and allowing our clients, vendors and employees to request access to, and correction of, their personal information.

Definitions

- Personal Information - means information about an identifiable individual (E.g., including name, age, home address and phone number, social insurance number, marital status, religion, income, credit history, medical information, education, employment information).
- Contact information - means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.
- Privacy Officer - means the individual designated responsible for ensuring that SPS West complies with this policy and PIPA.

Collecting Personal Information

Unless the purposes for collecting personal information are obvious and the client, vendor and employee voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.

We will only collect client, vendor and employee information that is necessary to fulfill the following purposes:

- To verify identity;
- To verify creditworthiness;
- To identify client, vendor and employee preferences;
- To understand the financial, banking, and insurance needs of our clients and vendors;
- To open and manage an account;
- To deliver requested products and services
- To guarantee a travel or hotel reservation;



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- To provide medical, dental, and health benefits to employees;
- To enrol the client in a program;
- To send out association membership information;
- To ensure a high standard of service to our clients;
- To meet regulatory requirements;

Consent

We will obtain client, vendor and employee consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).

Consent can be provided in writing or through email or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the client, vendor and employee voluntarily provides personal information for that purpose.

Consent may also be implied where a client, vendor and employee is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products and the client, vendor and employee does not opt-out.

Subject to certain exceptions (e.g. the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), clients, vendors and employees can withhold or withdraw their consent for SPS West to use their personal information in certain ways. A client's, vendor's and employee's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the client, vendor and employee in making the decision.

We may collect, use or disclose personal information without the client's, vendor's and employee's knowledge or consent in the following limited circumstances:

- When the collection, use or disclosure of personal information is permitted or required by law;
- In an emergency that threatens an individual's life, health, or personal security;
- When the personal information is available from a public source (e.g., a telephone directory);
- When we require legal advice from a lawyer;
- For the purposes of collecting a debt;
- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law

Using and Disclosing Personal Information

We will only use or disclose client, vendor and employee personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as:

- To conduct client, vendor and employee surveys in order to enhance the provision of our services;
- To contact our clients, vendors and employees directly about products and services that may be of interest;

We will not use or disclose client, vendor and employee personal information for any additional purpose unless we obtain consent to do so.

We will not sell client, vendor and employee lists or personal information to other parties unless we have consent to do so.



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Retaining Personal Information

If we use client, vendor and employee personal information to make a decision that directly affects the client, vendor and employee, we will retain that personal information for at least one year so that the client, vendor and employee has a reasonable opportunity to request access to it.

Subject to the above statement, we will retain client, vendor and employee personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

Ensuring Accuracy of Personal Information

We will make reasonable efforts to ensure that client, vendor and employee personal information is accurate and complete where it may be used to make a decision about the client, vendor and employee or disclosed to another organization.

Clients, vendors and employees may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.

A request to correct personal information should be forwarded to the Privacy Officer or designated individual.

If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the clients', vendors' and employees' correction request in the file.

Securing Personal Information

We are committed to ensuring the security of client, vendor and employee personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.

We will use appropriate security measures when destroying clients, vendors and employee's personal information.

We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Providing Clients, Vendors and Employees Access to Personal Information

Clients, vendors and employees have a right to access their personal information, subject to limited exceptions.

A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Privacy Officer or designated individual.

Upon request, we will also tell clients, vendors and employees how we use their personal information and to whom it has been disclosed if applicable.

We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.

If a request is refused in full or in part, we will notify the client, vendor and employee in writing, providing the reasons for refusal and the recourse available to the client, vendor and employee.



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Questions and Complaints: The Role of the Privacy Officer or designated individual

The Privacy Officer or designated individual is responsible for ensuring SPS West's compliance with this policy and the Personal Information Protection Act.

Clients, vendors and employees should direct any complaints, concerns or questions regarding SPS West's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client, vendor and employee may also write to the Information and Privacy Commissioner of Alberta.