

# Privacy Policy

## Preamble

The Professional Institute of the Public Service of Canada (PIPSC) is committed to protecting the privacy, accuracy and security of both PIPSC and Rand Employee (RM) members' personal information by adhering to the highest standards of confidentiality.

## Application

This policy relates to the collection and management of all members' personal information during the course of their activities. Information that may not be in the custody of PIPSC but which has been transferred to a third party shall be treated by that third party in a way that is consistent with PIPSC's privacy obligations to its members.

## Policy Requirements

The following policy outlines PIPSC's general practices concerning the collection, use, disclosure, retention and destruction of personal information and is consistent with the requirements of Canada's *Personal Information Protection and Electronic Documents Act* (PIPEDA) and analogous provincial privacy legislation in the provinces of Alberta, Québec and British Columbia (the "*Provincial Acts*")

Its purpose is to provide guidelines which balance both the right of all members to protect their personal information and PIPSC's need to collect and use personal information for representational purposes, to further its members' interests or as authorized or required by law.

## Definitions

Personal information refers to information about an identifiable individual, but it does not include the name, title, PIPSC membership class, business address or telephone number of an employee of an organization

Officer, for the purpose of this policy, refers to all individuals identified as officers in the PIPSC by-laws, as well as any PIPSC members elected to serve on a constituent body executive.

PIPSC Member, for the purpose of this policy, refers to all categories of members found in article 6 of PIPSC By-Laws and Regulations.

Rand Employee Member, for the purpose of this policy, refers to a public service employee part of a bargaining unit represented by PIPSC but who has not signed up for membership with PIPSC.

## **Effective Date**

This Policy takes effect on October 1, 2016.

## **Consent**

PIPSC shall obtain the consent of all members (PIPSC or RM) before collecting their personal information, except where obtaining consent is impractical and collection is otherwise authorized by law.

In its role as the membership's representative in the employee-employer relationship, PIPSC retains the authority to collect, use, and disclose personal information that relates to collective bargaining or collective agreement administration, including the investigation and resolution of labour relations issues. All members providing information after seeking assistance in such matters will be deemed to have consented.

All members may refuse to give consent or may withdraw consent by providing written notice to PIPSC's Privacy Officer, subject to legal restrictions on such refusal or withdrawal. Where consent is refused or withdrawn, it is done on the understanding that such refusal or withdrawal may impact the representational services that PIPSC is able to provide and may ultimately cause PIPSC to withdraw such representational services. PIPSC will not withdraw its representational services without reasonable notice to the member.

## **Collection, Use and Disclosure**

PIPSC may collect and use the personal information of all members where such collection and use is necessary for PIPSC, its officers and employees to fulfill their respective duties, and/or to advance PIPSC's purpose and mandate and its various collective agreements, and/or where such collection and use is in the best interest of PIPSC and its members. In the course of its business and in order to maintain the highest quality of service to PIPSC members and, on occasion, RM members, PIPSC will be required to collect certain personal information in order to:

1. Carry out its representational obligations;
2. Maintain a complete record of its membership;
3. Investigate and settle grievances, appeals, claims, etc.;
4. Collect and manage membership dues;
5. Assist in representing its members with respect to employment under the collective agreement;
6. Verify eligibility for strike pay and benefits;
7. Provide information about membership programs and benefits;
8. Administer the business of the union and constituent body;
9. Provide internet based information (e.g. address changes, email bulletin, general meetings and conference registration);
10. Develop and offer training and professional development;

Personal information may be collected, used or disclosed for any of these identified purposes as set out above. Only information that is required for the provision of services or the fulfilment of PIPSC's mandate will be collected. If members' personal information is needed for any purposes other than those set out above, PIPSC will not use or disclose it without obtaining additional consent from PIPSC and RM members unless authorized or required by law.

### **Accuracy**

PIPSC strives to ensure that the personal information it has on file is accurate and as up-to-date as necessary for the identified purposes for which it is to be used. Individuals are encouraged to make corrections to any personal information that is found to be inaccurate by contacting the Privacy Officer.

### **Access**

PIPSC members are, upon request to the Privacy Officer, entitled to access and review information held by PIPSC in accordance with the principles of PIPEDA and other applicable legislation.

### **Safeguarding and Destruction**

PIPSC undertakes to maintain appropriate policies, procedures and safeguard protecting personal information of members that it collects from loss, theft, copying, and unauthorized access. Individuals having access to personal information will maintain confidentiality and will not disclose the personal information of any members to third parties without their consent, except where disclosure is reasonably necessary to further the interests of PIPSC's membership, to preserve health and safety and/or as authorized or required by law. For instance, PIPSC may on occasion provide members' names and addresses to regulatory bodies or other similar organizations, for the limited purposes of facilitating the communication of information by such organization to members relevant to licensing, accreditation, transition etc., and the rights and benefits of members.

PIPSC will maintain electronic and/or paper records and will preserve the confidentiality of such records by employing reasonable and appropriate physical and technological safeguards. Periodically, PIPSC will review its records and only retain records where necessary or prudent to further the interests of PIPSC members, or where the retention of records is required by law. Where records do not need to be retained, the original records will be either returned destroyed. Destruction of records will be done in a manner that is consistent with this Policy and any applicable legislation.

## **Website Privacy**

PIPSC does not seek to collect information that can personally identify website visitors, except when such information is provided on a voluntary basis such as registering for a mailing.

PIPSC reserves the right to amass non-personal information in order to perform behavioural analysis in order to improve the user's experience. Such data is generally automatically collected through small files known as "cookies" or other electronic means. Users are able to disable, delete or alter the use of "cookies" through their browser.

## **Privacy Officer**

If members have any questions, concerns or complaints related to this policy, they are encouraged to contact the Privacy Officer in writing:

Linda Martel, Manager, Membership and Administration  
250 Tremblay Road  
Ottawa, ON K1G 3J8  
[lmartel@pipsc.ca](mailto:lmartel@pipsc.ca)

## **References**

The following laws and policies are relevant to this policy:

Relevant legislation and regulations:

1. *Alberta Personal Information Protection Act*;
2. *British Columbia Personal Information Protection Act*;
3. *Canada Not-For-Profit Corporation Act*;
4. *Personal Information Protection and Electronic Documents Act*;
5. *Quebec Civil Code*;
6. *Act Respecting Protection of Personal Information in the Private Sector* (Quebec);

Related policy:

1. Membership List Policy