

REBOUND POLICY AND PROCEDURES MANUAL

SECTION A: Introduction to Sarnia-Lambton Rebound Policy/Procedures

SUBJECT 9: PRIVACY POLICY

Page 1 of 6

Latest Revision date: November 29, 2016

Revised By: Tammy Vandenheuvel

Approved By: Executive Director, Carrie McEachran

Our Privacy Commitment to You

Sarnia Lambton Rebound is committed to keeping your personal information accurate, confidential, secure and private.

When you visit our website, contact us, participate in one of our programs, attend an event, or make a donation to support our activities, we are committed to protecting your privacy rights and your personal information.

Sarnia Lambton Rebound's privacy policy is based upon the 10 Privacy Principles contained within the Personal Information Protection and Electronic Documents Act (PIPEDA) for the Protection of Personal Information and reflects the requirements of applicable legislation including the Freedom of Information and Protection of Privacy Act (FIPPA).

This Privacy Policy describes the principles that Sarnia Lambton Rebound will use to protect the privacy of your personal information in its possession. It addresses the reasons why such information is collected, how it is used, how it is confidentially protected and outlines your rights with respect to this information.

This privacy policy is applicable to our Board Members, Customers, Community Partners, Donors, Volunteers and Employees.

Under the FIPPA, personal information is defined as "recorded information about an identifiable individual other than contact information." Under the Privacy Commission, identifiable individual is defined as "a serious possibility that an individual could be identified through the use of that information, alone or in combination with other available information".

Examples are age, name, source of income, home addresses and telephone numbers. Personal information does not include the name, title, or business address or telephone number of an employee of an organization.

Sarnia Lambton Rebound's Privacy Principles

1. Accountability

Sarnia Lambton Rebound is responsible for the protection of your personal information collected through our office (s), program activities and website. Individuals will be asked to review and sign a consent form before any personal information is released to third parties for the purpose of providing enhanced services or otherwise.

REBOUND POLICY AND PROCEDURES MANUAL

SECTION A: Introduction to Sarnia-Lambton Rebound Policy/Procedures

SUBJECT **9: PRIVACY POLICY**

Page 2 of 6

Latest Revision date: November 29, 2016

Revised By: Tammy Vandenheuvel

Approved By: Executive Director, Carrie McEachran

Sarnia Lambton Rebound's Executive Director is designated as the organization's Privacy Officer and has overall responsibility for the protection of personal information and for Sarnia Lambton Rebound's compliance with this Privacy Policy.

The Privacy Officer's Responsibilities include

- Documentation of uses of personal information
- Training employees in correct practices
- Compliance monitoring
- Reporting and dispute resolution

2. Identifying Purposes

Sarnia Lambton Rebound will provide a statement to explain the purpose(s) for the collection of your personal information wherever possible, before we ask you to disclose it.

- We collect personal data when you make use of or register for our programs and services, in order to better meet your program, service and information needs.
- We use and disclose data, which does not identify individuals, for statistical purposes to assess, develop and improve Sarnia Lambton Rebound's programs and services.
- We collect personal information in order to refer you to enhanced services, or to satisfy legal, government and regulatory obligations.
- We do not sell personal information we collect.
- We will not disclose your personal information to anyone else without your prior knowledge or consent, except when required by a government body or agency, or as permitted by law.

If you supply us with your contact information, you may hear from us about important information concerning Sarnia Lambton Rebound's program or service for which you are registered.

You may also hear from us about other Sarnia Lambton Rebound programs and services that may interest and benefit you or we may ask you for feedback about the services you have already received as part of our quality assurance commitment. If you do not wish to receive information about other programs, services or opportunities, please call (519) 344-2841.

REBOUND POLICY AND PROCEDURES MANUAL

SECTION A: Introduction to Sarnia-Lambton Rebound Policy/Procedures

SUBJECT **9: PRIVACY POLICY**

Page 3 of 6

Latest Revision date: November 29, 2016

Revised By: Tammy Vandenheuvel

Approved By: Executive Director, Carrie McEachran

Using our Website

You can access our website home page and browse our site without disclosing your personal data. Any personal information that site visitors voluntarily choose to provide in order to receive free electronic newsletters, participate in periodic polls and surveys and/or to complete any of our online application forms **IS NOT** shared with third parties unless stated otherwise.

Sarnia Lambton Rebound will ensure all personal information is secured and remains confidential.

Use of Cookies

A cookie is a small text file containing a unique identification number that is transferred from a website to the hard drive of your computer so that the website may identify separate visitors to the site and track users' activities on the website. A cookie will not let a website know any personally identifiable information about you, such as your real name and address.

Sarnia Lambton Rebound uses cookies only to keep track of how many people visit the website and how frequently each page is visited. Each individual movement of any user cannot be tracked while on the site.

Cookies are only used to track page popularity for statistical purposes and to improve the quality of the site and meet your needs.

(For more information on cookies, please check your browser's settings.)

Links on our Website

Because Sarnia Lambton Rebound wants your website experience to be informational and resourceful, our website also provides a number of links to third party sites.

Sarnia Lambton Rebound assumes no responsibility for the information practices of sites you are able to access through our site. We encourage you to review each site's privacy policy before disclosing any personally identifiable information.

3. Consent & Disclosure

The only personal information that Sarnia Lambton Rebound collects is with your knowledge and consent.

You can choose not to disclose any personal information we may ask you to provide.

However, a decision to withhold some personal information can result in our inability to provide you with our services.

REBOUND POLICY AND PROCEDURES MANUAL

SECTION A: Introduction to Sarnia-Lambton Rebound Policy/Procedures

SUBJECT 9: PRIVACY POLICY

Page 4 of 6

Latest Revision date: November 29, 2016

Revised By: Tammy Vandenheuvel

Approved By: Executive Director, Carrie McEachran

Further, you can withdraw your consent to the collection, use or disclosure of your personal information at any time, subject to any legal requirements and reasonable notice.

4. Limiting Collection

The amount and type of information that Sarnia Lambton Rebound collects is limited only to that which is necessary to fulfill the purposes identified.

Sarnia Lambton Rebound will ask for the information it requires directly from the individual. Personal information will be collected using procedures which are fair, transparent and lawful.

You can choose to disclose as much or as little personal information as you are comfortable with. As noted in Principle 3, a decision to withhold some personal information can prevent us from providing you with our services.

5. Limiting Use, Disclosure and Retention

Sarnia Lambton Rebound will use your personal information only for the purposes for which it was collected.

Your information will not be disclosed without your knowledge and consent, unless permitted or required by law.

Your personal information will be retained only as long as necessary to fulfill the purposes for which it was collected, and in compliance with any laws surrounding information retention. If all identified purposes for the use of your personal information have been exhausted, we will destroy the information or render it unidentifiable in accordance applicable legislation and legal requirements.

6. Accuracy

In order to ensure the reliable delivery of services and information, your personal information will be kept accurate, complete and up to date.

We assume that the information that you provide to us is accurate. If at any time your personal information changes, we hope to be informed of it immediately. If you contact us with a request, we will take appropriate steps to update or correct the personal information in our possession that you have previously provided to us.

REBOUND POLICY AND PROCEDURES MANUAL

SECTION A: Introduction to Sarnia-Lambton Rebound Policy/Procedures

SUBJECT 9: PRIVACY POLICY

Page 5 of 6

Latest Revision date: November 29, 2016

Revised By: Tammy Vandenheuvel

Approved By: Executive Director, Carrie McEachran

7. Safeguards

Sarnia Lambton Rebound employs a number of safeguards to protect your personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification.

Such safeguards include physical measures, for example locked filing cabinets, restricted access to offices, and limiting access on a “need to know” basis, and use of passwords and encryption.

Procedures for implementing these measures are communicated to all employees to ensure compliance with this principle.

8. Openness

Sarnia Lambton Rebound has easily understandable and readily available specific information about its policies relating to the management of personal information. Our policy is available at all times on Sarnia Lambton Rebound’s website, www.reboundonline.com under the section: “About Us”, and click on “Privacy Policy”.

9. Individual Access

Upon request, we will inform you if we hold any personal information about you and provide you with access to this information. If we have any personal information about you, we will also tell you for what purposes it is used for, if applicable.

You have a right to update any personal information that we hold on you. Should you wish to see the full contents of your information that is on file, you must make a formal written request and mail or email it to:

Carrie McEachran, Executive Director
Privacy Officer

Sarnia Lambton Rebound, 10 Lorne Crescent, Sarnia, ON, N7S 1H8

Phone: (519) 344-2841; Email: carrie@reboundonline.com.

We will respond to you within thirty (30) days after receipt of your written request or will notify you if a longer period is required by us in order to fully address your request, provided that an extension of thirty (30) day period is permitted by applicable privacy laws.

REBOUND POLICY AND PROCEDURES MANUAL

SECTION A: Introduction to Sarnia-Lambton Rebound Policy/Procedures

SUBJECT 9: PRIVACY POLICY

Page 6 of 6

Latest Revision date: November 29, 2016

Revised By: Tammy Vandenheuvel

Approved By: Executive Director, Carrie McEachran

10. Challenging Compliance

If, for any reason, you are concerned about our compliance with our Privacy Policy, you may contact our Privacy Officer in writing, by phone or by email:

Carrie McEachran, Executive Director

Privacy Officer

Sarnia Lambton Rebound, 10 Lorne Crescent, Sarnia, ON, N7S 1H8

Phone: (519) 344-2841; Email: carrie@reboundonline.com.

Sarnia Lambton Rebound has policies and procedures to receive, investigate and respond to individuals' complaints and questions.

If you are not satisfied with the way that Sarnia Lambton Rebound has responded to a complaint, you can contact the Privacy Commissioner of Canada.

This Privacy Policy may be updated from time to time. Notice of changes to this Privacy Policy that affect you will be posted at this site.

This policy was last revised in November, 2016.