

PPAO Privacy Policy

Policy for the Collection, Use and Disclosure of Personal Information

1. The Police Pensioners Association of Ontario (PPAO) – PRIVACY CODE

- a. The Police Pensioners Association of Ontario (PPAO) adheres to and abides by the principles set out in the PPAO – Privacy Code. All members and volunteers associated with this Association must sign an acknowledgement that they will comply with the requirements of the Code.
- b. Other persons, Associations or organizations who act for, or on behalf of, the PPAO are also required to comply with the principles and the Policy and will be given restricted access to personal information solely to perform the services provided for the PPAO.

2. The Policy Statement

- a. It is the policy of the Police Pensioners Association of Ontario (PPAO) to respect and safeguard the privacy of all members. While the PPAO does not engage in activities of a commercial character, we are committed to protecting the privacy and confidentiality of personal information in a manner that meets or exceeds the requirements of Federal and Provincial privacy laws.
- b. This Policy Statement applies to the PPAO not only as an organization but also to each individual member, prospective, or past member as a condition of membership or association with the PPAO, with respect to the Personal Information of other members.
- c. The PPAO only collects personal information about members necessary to process membership, collect dues, enforce its By-laws and generally effectively provide services to the Association.

3. The Privacy Compliance Officer

The Police Pensioners Association of Ontario (PPAO) has appointed the serving elected Vice President as the person/position responsible for privacy compliance in this Association. His/her name shall be made available to members. The responsibilities of the privacy compliance officer shall include:

- Establish and update information protection policies.
- Ensure policies are implemented by other Associations and/or third parties to which Information is exchanged.
- Establish criteria for classification of information.
- Evaluate the accessibility of sensitive information and take corrective action where necessary.
- Provide education to members on the importance of information protection.
- Attempt to resolve member privacy complaints to the satisfaction of the member.

4. The Collection, Use and Disclosure of Personal Information

- No personal information shall be collected from a member without first obtaining consent to the collection, use and dissemination of that information.
- Expressed consent (oral or written) must always be obtained except in the following situation.
- Consent may be implied where the information is not sensitive and where it can be reasonably assumed that the individual would expect the information to be disclosed in this fashion.
- Once information is collected, it will be used and disclosed only for the purposes disclosed to the individual.
- Application forms prepared by the Association for use by members shall contain the clauses approved by the directors by which the member authorizes the collection, use and disclosure of personal information.

5. Disclosure for New Purpose

- Anyone using personal information for some new purpose that extends beyond the consent already provided must obtain the express consent of the member for that use.
- Requests for information by law enforcement officials, lawyers, private investigators or other agents or subpoenas for documents issued by the court must be referred to the Board of Directors.

6. Protecting Information

- Information must be protected in a manner commensurate with its sensitivity, value and criticality. This policy applies regardless of the media on which information is stored, the locations where the information is stored, the systems used to process the information, or the processes by which information is handled.
- Mail, email and faxes must be routed directly to the intended recipient.
- Information should be available to other persons in the Association only on a need-to-know basis.
- Filing cabinets designated by the Association to contain personal, including sensitive, information are to be kept secured at all times.
- All Board Directors, Volunteers and Members will keep all Association files secure.

7. Accuracy of Information

- To ensure the quality of the information collected:
- Insofar as possible, personal information about members should be collected directly from the member.
- Disclaimers of accuracy should always be attached to any disclosure of information and on all Association data.

8. Access to Personal Information

- Copies of the PPAO Privacy Code, this Privacy Policy and any privacy information approved by this Association is always available to the membership.
- The Privacy Compliance Officer is responsible for responding to access requests and all such requests will be referred to him or her.

- All members will co-operate fully with the privacy compliance officer in responding to requests.
- On written request and appropriate identification satisfactory to the Association, an individual will be advised of personal information about him/her retained in the Association's records.
- Where information cannot be disclosed (for example the information contains reference to other individuals or is subject to solicitor-client privilege) the individual will be given reasons for non-disclosure.
- An individual may have appended to a record any alternative information where the office is of the view that the appended information is, in fact, correct.

9. **Compliance**

- Failure to comply with the Privacy Policy constitutes a breach of the PPAO Privacy Code.
- Any complaints from an individual concerning the collection, use or disclosure of their personal information or concerning the individual's ability to access their personal information must be referred to the privacy compliance officer, who will attempt to resolve the complaint to the individual's satisfaction.
- In the event the complaint cannot be resolved internally to the member's satisfaction, he or she will be advised of where to direct the complaint.

10. **Contact**

For further Information contact the Privacy Compliance Officer(s) at:

PPAO Vice President - info@PPAO.CA