



## **Accessibility Ontario**

# **Personal Information Protection Policy**

*February 2016*

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

While we have always respected our clients' privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of Canada's Personal Information Protection and Electronic Documents Act (PIPEDA). PIPEDA is a Canadian law relating to data privacy. It governs how organizations collect, use and disclose personal information in the course of business.

We will inform our clients 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 PIPEDA, outlines the principles and practices we will follow in protecting clients' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our clients' personal information and allowing our clients to request access to, and correction of, their personal information.

## **Definitions**

**Personal Information** – means information about an identifiable. Personal information does not include contact information (described below).

**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 PIPEDA.

**Privacy Officer** – means the individual designated responsibility for ensuring that Accessibility Ontario complies with this policy and PIPEDA.

## **Section 1 – Collecting Personal Information**

- 1.1 Unless the purposes for collecting personal information are obvious and the clients 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.

## **Section 2 – Consent**

- 2.1 We will obtain client consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided orally, in writing, in person, or electronically, through an authorized representative or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the client voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a client is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs and the marketing of new services or products and the client does not opt-out.
- 2.4 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 can withhold or withdraw their consent for Accessibility Ontario to use their personal information in certain ways. A client'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 in making the decision.
- 2.5 We may collect, use or disclose personal information without the client's knowledge or

consent in the following limited circumstances:

- When clients register for our programs and services, in order to better meet their program, service and information needs.
- For statistical purposes to assess, develop, and improve the Accessibility Ontario's programs and services.
- To refer clients to enhanced services, or to satisfy legal, government and regulatory obligations.

### **Section 3 – Using and Disclosing Personal Information**

3.1 We will only use or disclose client 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 or customer surveys in order to enhance the provision of our services;
- To contact our clients directly about products and services that may be of interest;

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

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

### **Section 4 – Retaining Personal Information**

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

### **Section 5 – Ensuring Accuracy of Personal Information**

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

5.2 Clients 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.

5.3 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' request in the file.

## **Section 6 – Providing Clients Access to Personal Information**

- 6.1 Clients have a right to access their personal information, subject to limited exceptions.
- 6.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.
- 6.3 Upon request, we will also tell clients how we use their personal information and to whom it has been disclosed if applicable.
- 6.4 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.
- 6.5 If a request is refused in full or in part, we will notify the client in writing, providing the reasons for refusal and the recourse available to the client .

## **Section 7 – Questions and Complaints**

Contact information for Accessibility Ontario:

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