



THE COPING CENTRE

## Privacy Policy

Coping Bereavement Support Groups of Ontario Inc. (The Coping Centre) is committed to respecting the privacy of its employees, volunteers, donors, and contacts. In demonstration of our commitment to this privacy and in voluntary compliance with the Personal Information Protection and Electronic Documents Act (PIPEDA), we have created the following Privacy Policy (the Policy). The Policy has been designed to reflect our commitment to the principles outlined in PIPEDA.

All directors, officers, employees, and volunteers of Coping Bereavement Support Groups of Ontario Inc. are required to comply with the Policy and may be given restricted access to personal information solely to fulfill the purposes as set out in the Policy.

All other persons or organizations who act for, or on behalf of, Coping Bereavement Support Groups of Ontario Inc. are also required to comply with the principles of the Policy and may be given restricted access to personal information solely to fulfill the purposes as set out in the Policy.

## Principle 1 - Accountability

**1.1** - Coping Bereavement Support Groups of Ontario Inc. is responsible for personal information which we collect, use, or distribute and any personal information in our custody or under our control.

**1.2** - Coping Bereavement Support Groups of Ontario Inc. has appointed a Privacy Officer who will be responsible for overseeing the Policy as well as any inquiries, requests, or concerns relating to privacy matters. The Privacy Officer may, from time to time, designate one or more individuals within Coping Bereavement Support Groups of Ontario Inc. to act on his or her behalf.

**1.3** - We will continually create and update procedures in accordance with the Policy to govern the handling of personal information and respond to complaints.

## **Principle 2 - Purposes**

**2.1** - Coping Bereavement Support Groups of Ontario Inc. is committed to ensuring that the purposes for which personal information is collected, used, or disclosed are identified, reasonable, and appropriate in the circumstance.

**2.2** - Coping Bereavement Support Groups of Ontario Inc. will only collect personal information from employees, volunteers, donors, and contacts that is necessary to fulfill the following purposes:

- To verify identity
- To assess ongoing suitability for employment or volunteer positions
- To identify individual preferences
- To understand individual needs
- To provide requested products and services
- To inform regarding programs and educational opportunities
- To make contact for fundraising
- To meet government requirements

## **Principle 3 - Consent**

**3.1** - Coping Bereavement Support Groups of Ontario Inc. will obtain reasonably informed consent of employees, volunteers, donors, and contacts to collect, use, or disclose personal information except where we are authorized to do so without consent.

**3.2** - Consent can be implied where the purpose for collecting, using, or disclosing the personal information would be considered obvious and the employees, volunteers, donors, and contacts voluntarily provides personal information for that purpose.

**3.3** - In general, the use of products and services by an employee, volunteer, donor, or contact, or the acceptance of employment or benefits by an employee, or volunteer, constitutes implied consent for Coping Bereavement Support Groups of Ontario Inc. to collect, use and disclose personal information for all identified purposes. Consent may also be implied where employees, volunteers, donors, and contacts are given notice and a

reasonable opportunity to opt-out of their personal information being used for certain purposes and the employee, volunteer, donor, or contact does not opt-out. Individuals may withdraw their consent at any time subject to legal or contractual notice, by providing reasonable notice to The Coping Centre of their intent to withdraw their consent.

**3.4** - The following are examples of when we may collect, use, or disclose the personal information of an employee, volunteer, donor, or contact without their consent:

- When the collection, use, or disclosure of personal information is permitted or required by law;
- When collection is clearly in your best interests, and we are unable to obtain your consent in a timely way;
- In an emergency that threatens an individual's life, health, or personal security;
- When disclosure is required for archival purposes;
- When the personal information is available from a public source (e.g., a telephone directory);
- When the personal information is available through observation at a public event to which you attended voluntarily;
- When the collection, use, or distribution is necessary to determine your suitability to receive an honour, award, or similar benefit or to be selected for a religious, athletic, or artistic purpose;
- When we require legal advice from a lawyer;
- For the purposes of collecting a debt or other obligation;
- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law;
- When the personal information is voluntarily disclosed by the person to whom it applies by using equipment or data owned by The Coping Centre

## **Principle 4 - Limiting Collection**

**4.1** - Coping Bereavement Support Groups of Ontario Inc. will limit the collection of personal information to that which is necessary for identified purposes. The Coping Centre

will only collect personal information by fair and lawful means and for purposes that a reasonable person would consider appropriate in the circumstances.

## **Principle 5 - Limiting Use, Disclosure, and Retention**

**5.1** - Coping Bereavement Support Groups of Ontario Inc. will not use or disclose personal information for purposes other than for those for which it was collected except with the consent of the individual or as required or permitted by law.

**5.2** - Coping Bereavement Support Groups of Ontario Inc. will only retain personal information as long as it is needed for the purposes for which it was collected or consented to.

**5.3** - When personal information collected is no longer relevant to its purpose or when it is permitted by law, Coping Bereavement Support Groups of Ontario Inc. will ensure that it is deleted, destroyed, or made anonymous in a secure manner.

## **Principle 6 - Accuracy**

**6.1** - Coping Bereavement Support Groups of Ontario Inc. will take reasonable efforts to ensure that personal information is accurate and complete.

**6.2** - Coping Bereavement Support Groups of Ontario Inc. will update information when it is necessary to fulfill the purpose for which the information was collected or when an individual notifies us. 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. This request should be directed to the Privacy Officer.

## **Principle 7 - Safeguards**

**7.1** - Coping Bereavement Support Groups of Ontario Inc. will routinely review and update our security measures which will include: Physical measures such as locking filing cabinets and restricted access to offices as appropriate; Organizational measures, such as security clearances and policies governing access to information; Technological measures, such as the use of passwords and encryption.

**7.2** - Coping Bereavement Support Groups of Ontario Inc. will update information when it is necessary to fulfill the purpose for which the information was collected or when an individual notifies us. 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. This request should be directed to the Privacy Officer.

**7.3** - Coping Bereavement Support Groups of Ontario Inc. shall protect personal information disclosed to third parties by contractual agreement that stipulates the confidentiality and safeguard requirements that are comparable to our own.

## **Principle 8 - Openness**

**8.1** - Coping Bereavement Support Groups of Ontario Inc. is committed to making its privacy policies and procedures available and clear to all interested parties.

**8.2** - Any questions or concerns regarding our policy or procedure may be directed in writing to our Privacy Officer.

## **Principle 9 - Individual Access**

**9.1** - Employees, volunteers, donors and contacts have a right to access their personal information, subject to limited exceptions including, but not limited to:

- Situations of solicitor-client privilege
- Situations where disclosure may reveal the personal information of another individual
- Situations where the health or safety of an individual may be jeopardized
- Situations where the information was provided confidentially, such as the references for

**9.2** - A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought and should be forwarded to the attention of the Privacy Officer. A reasonable fee may be charged for providing access to personal information, in which case we will inform the employee, volunteer, donor or contact prior to proceeding.

**9.3** - In certain situations, it may not be possible to provide access to all the personal information that is held, and a request may be refused in whole or in part, providing the reasons for refusal and the recourse available. For example, information may not be

provided if to do so would reveal personal information about a third party or jeopardize the security of another.

## **Principle 10 - Challenging Compliance**

**10.1** - It is Coping Bereavement Support Groups of Ontario Inc.'s policy that all privacy related complaints shall be investigated. Complaints made regarding the Privacy Policy or the use of personal information should be made to the Privacy Officer in writing.

**10.2** - The procedure of Coping Bereavement Support Groups of Ontario Inc. for dealing with complaints is as follows:

1. Record the date and nature of a complaint when it is received
2. Acknowledge receipt of the complaint promptly
3. Review the matter fairly and impartially, providing to the individual, where possible, access to all relevant records
4. Notify the individual of the outcome of the investigation promptly and clearly
5. If the complaint is found to be justified, we will take appropriate measures, including, if necessary, amending our policies and practices. We will also, if and as required, correct any inaccurate or incomplete information when possible

**10.3** - If the Privacy Officer is unable to resolve the concern, the employee, volunteer, donor or contact may also write to the Federal Privacy Commissioner.

## **Contact Information**

Privacy Officer

Coping Bereavement Support Groups of Ontario Inc.

1740 Blair Road, Cambridge ON, N3H 4R8

Phone: 519-650-0852

Email: [privacyofficer@copingcentre.com](mailto:privacyofficer@copingcentre.com)