

POLICY TO PROTECT PERSONAL INFORMATION

1.1. POLICY FOR CCO

Catholic Christian Outreach respects its constituent's privacy. We protect personal information and adhere to all legislative requirements with respect to protecting privacy. CCO does not rent, sell, share, or trade mailing lists. The information one provides will be used to deliver services and to keep them informed and up to date on the activities of Catholic Christian Outreach, including programs, services, special events, opportunities to volunteer or to give, etc through periodic contacts. If at any time one wishes to be removed from any of these contacts, they can simply contact CCO by phone at (306) 652-5100 or via email at privacy@cco.ca, and we will gladly accommodate the request.

Our commitment:

1.1.1.1 Our organization is committed to protecting the privacy of the personal information of its employees, members, customers and supporters. We value the trust of those we deal with, and of the public, and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the information that you choose to share with us.

1.1.1.2 During the course of our various projects and activities, we frequently gather and use personal information. Anyone from whom we collect such information should expect that it will be carefully protected and that any use of or other dealing with this information is subject to consent. Our privacy practices are designed to achieve this.

1.1.1.3 To safeguard the personal information entrusted to Catholic Christian Outreach (CCO) and to comply with the Personal Information Protection and Electronic Documents Act (PIPEDA) and any other applicable legislation, CCO is committed to the following principles:

1. Accountability
2. Identifying Purposes
3. Consent
4. Limiting collection
5. Limiting use, disclosure, and retention
6. Accuracy
7. Safeguards
8. Openness
9. Individual access
10. Challenging compliance

1.1.1.4 These principles will be enacted in accordance with the CCO Policy to Protect Personal Information”

CCO, its directors, officers, employees and volunteers are required to comply with the principles and the Policy and will be restricted access to personal information solely to perform the services provided by CCO.

Other persons, or organizations who act for, or on behalf of CCO 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 CCO.

CCO has designated Michelle Perrault to be CCO's Personal Information Compliance Officer. Any inquiry, request or concern related to privacy matters should be made in writing to CCO. Michelle may be contacted at:

Personal Information Compliance Officer
Catholic Christian Outreach
PO Box 7421
Saskatoon, SK S7K 4J3
privacy@cco.ca

A copy of the Policy is available at CCO's website: www.cco.ca. A printed copy of the Policy may be requested by mail or e-mail at the above address.

1.2. ACCOUNTABILITY

1.2.1. A member of the Headquarters staff will be appointed as the Personal Information Compliance Officer (the "Officer") for Catholic Christian Outreach (CCO). To contact the Officer, please call Headquarter at (306) 652-5100 or email privacy@cco.ca.

1.2.2. All persons, whether employees, volunteers, etc. who collect, process, or use personal information shall be accountable regarding the protection of personal information to the Officer. The Officer is directly accountable to the CCO President who is accountable to its national Board of Directors.

1.2.3. Catholic Christian Outreach's Policy To Protect Personal Information (the "Policy") shall be made available via CCO's website (www.cco.ca), or a paper copy provided upon written request.

1.2.4. Any personal information transferred to a third party for processing is subject to this Policy. The Officer shall use contractual or other

appropriate means to protect personal information at a level comparable to this Policy while a third party is processing this information.

- 1.2.5. Any person who believes CCO uses personal information collected, retained, or used for purposes other than those that person explicitly approved may contact the Officer to register a complaint or to make any related inquiry.
- 1.2.6. Upon receiving a complaint from any person regarding the collection, retention, or use of personal information, the Officer shall promptly investigate the complaint and notify the person who complained about his/her findings and corrective action taken, if any.
- 1.2.7. Upon receiving the response from the Officer, the person who filed the complaint may, if he/she is not satisfied, appeal to the CCO President and then CCO's Board of Directors to review and determine the disposition of the complaint at issue.
- 1.2.8. The determination of the Board of Directors shall be final and the Officer shall abide by and implement any of its recommendations.
- 1.2.9. The Officer shall communicate and explain this Policy and give training regarding it to all employees and volunteers who might be in a position to collect, retain, or use personal information.
- 1.2.10. The Officer shall prepare and disseminate information to the public, which explains CCO's protection of personal information policies and procedures.

1.3. IDENTIFYING PURPOSES

- 1.3.1. The Officer shall document the purpose for which personal information is collected to comply with the openness and individual access principles outlined below.
- 1.3.2. The Officer shall determine the information that will be needed to fulfill the purposes for which the information is to be collected, to comply with the limited collection principle below.
- 1.3.3. The Officer shall ensure that the purpose is specified at or before the time of collecting the personal information from an individual.
- 1.3.4. The Officer shall ensure that the information collected will not be used for any other purpose before obtaining the individual's approval,

unless the new purpose is required by law.

- 1.3.5. The Officer shall ensure that a person collecting personal information will be able to explain to the individual why this is being done.
- 1.3.6. The Officer shall ensure that limited collection, limited use, disclosure, and retention principles are respected in identifying why personal information is to be collected.

1.4. CONSENT

- 1.4.1. The Officer shall ensure that the individual from whom personal information is collected consents to this and to it being used and disclosed.
- 1.4.2. The Officer shall ensure that the individual can reasonably understand why and how the information will be used when the consent is given.
- 1.4.3. The Officer shall ensure that no condition is attached to supplying benefits, because of CCO's activities, requiring the individual to give consent for the collection, use, or disclosure of information beyond that required to fulfill the explicitly specified and legitimate purposes.
- 1.4.4. The Officer shall ensure that express consent is obtained wherever possible and appropriate. In rare circumstances where, in the Officer's opinion (having regard to the information's sensitivity and the Policy's purpose and intent), implied consent might be acceptable.
- 1.4.5. In obtaining consent, the Officer shall ensure that the individual's reasonable expectations are respected.
- 1.4.6. The Officer shall ensure that the express consent obtained from an individual is clear and in an appropriately verifiable form.
- 1.4.7. The Officer shall ensure that the individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. The individual shall promptly be informed of the withdrawal's implications.

1.5. LIMITING COLLECTION

- 1.5.1. The Officer shall ensure that personal information will not be collected indiscriminately. Both the amount and type of information collected shall be limited to that which is necessary to fulfill the purposes identified. The Officer shall specify the type of information to be

collected, according to the openness principle.

- 1.5.2. The Officer shall ensure that information is collected only by fair and lawful means without misleading or deceiving individuals as to the reason.
- 1.5.3. The Officer shall ensure that the identifying purposes and consent principles are followed in identifying why personal information is to be collected.

1.6. LIMITING USE, DISCLOSURE, AND RETENTION

- 1.6.1. The Officer shall ensure that personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law, and any use of personal information shall be properly documented.
- 1.6.2. The Officer shall ensure that all personal information is destroyed, erased, or made anonymous as soon as the purpose for which it was collected is no longer relevant, or as permitted by law. There shall be a regular review of the need to continue retaining personal information.
- 1.6.3. The Officer shall ensure that all use, disclosure, and retention decisions are made in light of the consent principle, the identifying purposes principle and the individual access principle.

1.7. ACCURACY

- 1.7.1. The Officer shall reasonably ensure that the personal information is accurate, complete, and up to date, taking into account the individual's interests. The Officer shall ensure that the information is sufficiently accurate, complete, and up to date to minimize the possibility that inappropriate information might be used to make a decision about an individual.
- 1.7.2. The Officer shall ensure that CCO does not routinely update personal information, unless it is necessary to fulfill the purposes for which the information was collected.
- 1.7.3. The Officer shall ensure that personal information used on an ongoing basis, including information that is disclosed to third parties, should generally be accurate and up to date, unless limits to the requirement for accuracy are clearly set out.

1.8. SAFEGUARDS

- 1.8.1. The Officer shall ensure that CCO has security safeguards to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. He/she shall do this regardless of the format in which CCO holds the information.
- 1.8.2. Depending on the information's sensitivity, the Officer may permit reasonable discretion regarding the information that has been collected: the amount, distribution, format, and the method of storage. A higher level of protection shall safeguard more sensitive information according to the consent principle's considerations.
- 1.8.3. The Officer shall ensure that the protection methods include, (a) physical measures, for example, locked filing cabinets and restricted access to offices;(b) organizational measures, for example, security clearance and limiting access on a "need-to-know" basis; and(c) technological measures, for example, the use of passwords and encryption.
- 1.8.4. The Officer shall ensure that all employees and volunteers know the importance of keeping personal information confidential.
- 1.8.5. The Officer shall ensure that care is taken when personal information is disposed of or destroyed to prevent unauthorized parties from gaining access to it.

1.9. OPENNESS

- 1.9.1. The Officer shall ensure that CCO is open about its policies and practices regarding the management of personal information. The policies and information about the related practices shall be available without unreasonable effort in a format generally understandable.
- 1.9.2. The Officer shall ensure that the information available shall include,(a) the name or title and address of the Officer who is accountable for CCO's policies and practices and to whom complaints or inquiries can be forwarded;(b) the means of gaining access to personal information held by CCO;(c) a description of the type of personal information held by CCO, including a general account of its use;(d) a copy of any brochures or other information that explain CCO's policies, standards, or codes; and(e) what personal information is made available to related organizations (e.g., organizations that are affiliated).
- 1.9.3. The Officer shall ensure the information that must be provided according to 19.10.2 is available at the locations CCO operates, online, or through the mail.

1.10. INDIVIDUAL ACCESS

- 1.10.1. The Officer shall ensure that, upon written request, CCO shall inform an individual whether CCO holds personal information about him/her. If possible, the information's source shall also be given. CCO shall allow the individual access to this information. CCO may, however, choose to make sensitive medical information about its employees or volunteers available through a medical practitioner. CCO shall also account for the use that has been made or is being made of this information and give an account as to the third parties to whom it has been disclosed. (Note: If the Officer believes for valid reasons that access to personal information should be denied, the Officer shall consult legal counsel before making such a decision.)
- 1.10.2. A person requesting his/her personal information may be required by the Officer to give sufficient information to permit CCO to provide an account of the existence, use, and disclosure of personal information. Information shall be used only for the purpose for which it was obtained.
- 1.10.3. If CCO has supplied personal information about an individual to third parties, the Officer shall ensure that an attempt is made to be as specific as possible. When it is impossible to give a list of organizations to which CCO has actually disclosed information about an individual, CCO shall provide a list of organizations to which it might have disclosed information about the individual.
- 1.10.4. The Officer shall ensure that CCO responds to an individual's request within a reasonable time and at minimal or no cost to the individual. The requested information shall be made available in a generally understandable form. For example, CCO shall explain abbreviations or codes it uses to record information.
- 1.10.5. The Officer shall ensure that when an individual successfully demonstrates the inaccuracy or incompleteness of personal information, CCO shall amend the information as required. Depending on the information challenged, amendment involves the correction, deletion, or addition of information. When appropriate, the amended information shall be transmitted to third parties having access to the information in question.
- 1.10.6. The Officer shall ensure that when a challenge is not resolved to the individual's satisfaction, CCO shall record the unresolved challenge's substance. When appropriate, the unresolved challenge's existence

shall be transmitted to third parties having access to the information in question.

1.11. CHALLENGING COMPLIANCE

- 1.11.1. The Officer is authorized to address a challenge concerning compliance with the above principles.
- 1.11.2. The Officer shall develop procedures to receive and respond to complaints or inquiries about the policies and practices regarding the handling of personal information. The compliance procedures shall be easily accessible and simple to use.
- 1.11.3. The Officer shall inform individuals inquiring about lodging complaints that relevant complaint procedures exist.
- 1.11.4. The Officer shall investigate all complaints. If a complaint is found to be justified, the Officer in collaboration with the CCO President shall take appropriate measures, including, if necessary, amending this Policy and general policies and practices pertaining to personal information entrusted to CCO.