



I.A.T.S.E. Local 667 PRIVACY CODE

INTRODUCTION:

Privacy of personal information is an important principle in the negotiation of our contracts, marketing our membership and the administration of our organization. We understand the importance of protecting your personal information and are committed to collecting, using and disclosing your personal information responsibly. We also attempt to be as open and transparent as possible about the way we handle your personal information.

While it is not clear that organizations such as ours are covered by P.I.P.E.D.A (the *Personal Information Protection and Electronic Documents Act*) in our relations with our members, we feel privacy issues are important and have decided to formulate a Privacy Code that complies with P.I.P.E.D.A. Our Privacy Code is organized to follow the Act's ten interrelated principles that are the foundation of P.I.P.E.D.A.

P.I.P.E.D.A regulates the collection, use and disclosure of 'personal information'. The term 'personal information' is defined broadly in the law to include 'information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization. This law protects the privacy of financial information, health information and other types of personal information.

1. Accountability

I.A.T.S.E. Local 667 is accountable for the protection of member and staff personal information. While Officers and management of I.A.T.S.E. Local 667 are ultimately accountable for the protection of personal information, the day-to-day monitoring for compliance is also shared with staff, committee members and the Executive Board. The overall responsibility for the protection of personal information and compliance with its policy rests with I.A.T.S.E. Local 667's Privacy Officer.

I.A.T.S.E. Local 667 will use all available procedures, including but not limited to, contractual arrangements to ensure that the use of member personal information provided to/from third parties is in compliance with this code.

I.A.T.S.E. Local 667 is committed to ensuring that the appropriate security measures are employed in the transfer of sensitive information. However, when using e-mail or wireless communication, you are advised that complete confidentiality and security are not assured.

I.A.T.S.E. Local 667 will continue to develop policies and procedures to: protect personal information; receive and respond to complaints and inquiries; train staff, Executive Board Members and Committee Members as well as communicate the policies and procedures to our membership, employers of the I.A.T.S.E. Local 667 members and staff as required.

2. Purposes of Collecting Personal Information

I.A.T.S.E. Local 667 collects personal information for the following reasons:

- communicating with our membership
- providing employers of the I.A.T.S.E. Local 667 members with a means of communicating with our membership
- ensuring all policies and procedures of I.A.T.S.E. Local 667 are adhered to which can include any of the following:
 - enforcing the terms and conditions of the collective agreement
 - providing member benefits
 - workplace health & safety
 - promotion of the membership
 - ensuring member dues or payables are reasonably collected

In the event any new purpose is identified, all members will be apprised of this information.

Much information is collected, used and disclosed in electronic form. The I.A.T.S.E. Local 667 web site uses cookies (see our privacy code Supporting Documentation for a full explanation of cookies) in order to provide members, staff and employers with our full range of services.

A detailed list of what personal information is collected, the reasons why and the retention and disposal of such information is available upon request to the Privacy Officer.

3. Consent

Consent can be expressed, implied, or given through an authorized representative such as a lawyer or agent. Consent may be given orally, in writing, or electronically.

I.A.T.S.E. Local 667 will obtain consent to collect, use or disclose any personal information except where outlined in this policy.

Based on the reasonable expectations of the members of I.A.T.S.E. Local 667 as a result of the established relationship between the Union and its members, we consider that we have your implied consent to continue with the collection, use and disclosure of your personal information as outlined in this Privacy Code.

In the event there is a change in the collection, use and/or disclosure of your personal information we will advise you in writing and request your consent accordingly.

I.A.T.S.E. Local 667 may collect, use or disclose personal information without your knowledge or consent in a number of exceptional circumstances. These circumstances are set out in Section 7 of P.I.P.E.D.A. and are available upon request.

Withdrawal or Refusal of Consent:

Subject to contractual or legal restrictions, you may withdraw or refuse consent provided that the I.A.T.S.E. Local 667 is given reasonable notice. Refusal or withdrawal of consent may prevent the I.A.T.S.E. Local 667 from providing you and the employers of the I.A.T.S.E. Local 667 members with a service.

In the event you have chosen to disable all cookies on your computer and/or set your privacy settings too high, you may not be able to access certain areas of the I.A.T.S.E. Local 667

website. If you do want to access the I.A.T.S.E. Local 667 website and are blocked by privacy or cookie settings, you have some alternatives available to you:

- list the I.A.T.S.E. Local 667 website on your exclusion list, or
- purchase cookie managing software to allow for access to the I.A.T.S.E. Local 667 website.

If you are not desirous of proceeding through the website, you may phone the I.A.T.S.E. Local 667 office for copies of written documentation which would otherwise be available through the I.A.T.S.E. Local 667 website.

4. Limits for Collecting Personal Information

I.A.T.S.E. Local 667 will only collect personal information for the purposes identified. I.A.T.S.E. Local 667 will use methods that are lawful and will not collect information unnecessarily.

Member information may only be used or disclosed for the purposes for which it was collected unless the member has otherwise consented, or when it is required or permitted by law.

5. Limits for Using, Disclosing, and Keeping Personal Information.

Member information will only be used or disclosed for the purpose for which it was collected. I.A.T.S.E. Local 667 will not use personal information for any additional purpose unless I.A.T.S.E. Local 667 seeks your approval to do so, or unless legally or contractually required to do so.

All member or staff personal information will be retained only as long as necessary or expected to be necessary for the identified purposes, or as required by legislation. If information becomes redundant, it will be deleted, shredded or otherwise destroyed.

6. Accuracy

Reasonable efforts will be made to ensure member or staff personal information is as accurate, complete, and current as required for the purposes for which it was collected. In most cases, I.A.T.S.E. Local 667 relies on its members and staff to ensure that certain information (i.e. contact information) is current, complete and accurate.

7. Safeguarding Personal Information.

Depending upon the sensitivity of the personal information, appropriate safeguards will be implemented to protect information from unauthorized use and access in an effort to ensure the security, integrity and privacy of personal information which safeguards shall include but not be limited to:

- a) physical measures, such as locked cabinets and restricted access to offices;
- b) organizational measures, for example limiting access on a 'need to know' basis;
- c) technological measures, for example the use of passwords.
- d) Contractual measures with Third Parties

8. Openness

I.A.T.S.E. Local 667 is open about the policies and procedures in use to protect personal information which are available to individuals upon request.

The following information will be made available:

- The name, title and address of the person accountable for the code, policies and procedures and to whom complaints or inquiries can be forwarded
- A description of the type of personal information held by I.A.T.S.E. Local 667, including a general account of its use
- A copy of our Privacy Code or other information that explains the policies and procedures
- An explanation of what personal information is made available to related organizations.

9. Individual Access

Upon written request to the Privacy Officer, a member or staff shall be informed of the existence, use and disclosure of their information, and shall be given access to it. Members and staff may verify the accuracy and completeness of their information, and may request that it be amended, if appropriate. The review procedures may not compromise the security, integrity or privacy of other member or staff information.

All requests will be responded to with due diligence, but no later than 30 days of receipt of the request and at minimal or no cost and in a form that is generally understandable. This time limit may be extended if additional time is required to undertake any consultations necessary to respond to the request.

In some situations, I.A.T.S.E. Local 667 may not be able to provide access to any or all personal information about a member or staff, For example (but not limited to these examples) if the requested information is too costly to provide, if the information contains references to other individuals, information that cannot be disclosed for legal, security, or commercial proprietary reasons, and information that is subject to solicitor-client or litigation privilege.

10. Challenging Compliance.

Members and staff have the right to challenge the compliance with the privacy principles and our stated privacy policies and practices by filing a written challenge. All communication regarding this should be directed in writing to the I.A.T.S.E. Local 667 Privacy Officer:

I.A.T.S.E. Local 667
229 Wallace Avenue
Toronto ON M6H 1V5
Attention: The Privacy Officer

A decision will be rendered within a reasonable period of time.