



Policy Name:	Privacy Policy		
Policy Number:	AP002	Policy Type:	Board
Original Approval:	September 2019	Review Cycle:	5 years
Last Approval:	June 2022	Last Review:	June 2022

1.0 Purpose

The Edmonton Screen Industries Office Society (ESIO) is committed to safeguarding the personal information entrusted to us by our contributors, partners, applicants, clients, volunteers, staff and other stakeholders. The ESIO values the trust of these stakeholders and the general public and recognizes that maintaining this trust requires that the ESIO be transparent and accountable in how it treats the information that is shared with us.

2.0 Legislation

The ESIO is governed by the Personal Information Protection Act (PIPA). As a non-profit society, PIPA applies to the ESIO only when personal information is used for commercial activities. Although this applies to very few of the ESIO activities, our adherence to this policy reflects the importance we place upon the protection of privacy.

3.0 Definition of Personal Information

Personal information is any information that can be used to distinguish, identify, or contact a specific individual, such as an individual's name, address, birth date, email address, phone number, Social Insurance Number, or credit card information. Personal information does not include business contact information when it is collected, used, or disclosed for the purposes of enabling the individual or organization to be contacted in relation to business matters and for no other purpose. This includes 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.

4.0 Procedure

4.1 Collection and Use of Personal Information

Personal information will only be collected and used by authorized staff, volunteers and contractors consistent with the activities of the ESIO. Personal information is collected for the following reasons:

- to determine eligibility for engaging employment services, volunteer services and/or contracted services
- to establish training and development requirements
- to assess and manage performance issues
- to administer payments, disbursements, payroll and benefits
- to process work related claims (e.g. benefits, worker's compensation)
- to acknowledge contributors
- to comply with applicable legislation
- to comply with requirements of funding bodies
- to keep contributors and other stakeholders informed about the ESIO's activities
- to promote opportunities for contributors and potential contributors to support the ESIO
- to meet program delivery requirements
- to build and maintain relationships with contributors and other stakeholders
- to acknowledge and communicate with volunteers
- to protect against fraud
- to review and assess applications for grants, loans and other investments

Personal information collected by the ESIO will not be used or disclosed for purposes other than those for which it was collected, except with the consent of living individuals or existing corporations or as required by law.

4.2 Consent

The manner in which the ESIO obtains consent for the collection of personal information varies with the type information gathered and the method in which that information is gathered. Because of the nature of the information the ESIO collects, in many cases, consent is considered to be implied at the time of collection. Consent is implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the client, customer, or stakeholder voluntarily provides personal information for that purpose. Consent may also be implied where a client, customer or stakeholder is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products, fundraising and the client, customer, or stakeholder does not opt-out.

The ESIO may collect, use or disclose personal information without the client's, customer's or stakeholder's knowledge or consent in situations as outlined in S. 12, 15 and 18 of PIPA. Some examples include:

- When the collection, use or disclosure of personal information is permitted or required by law.
- In an emergency that threatens an individual's life, health, or personal security.
- When the personal information is available from a public source (e.g., a telephone directory).

- When we require legal advice from a lawyer.
- For the purposes of collecting a debt.
- To protect ourselves from fraud.
- To investigate an anticipated breach of an agreement or a contravention of law.

The ESIO will make a reasonable effort to ensure that individuals are aware of the purposes for which information is collected at the time of collection. Individuals may withdraw consent by contacting the ESIO, unless personal information is required to fulfill our legal obligations, as outlined above and within PIPA.

Furthermore, we will obtain client, customer, member or stakeholder consent to collect, use or disclose personal information. Consent can be provided orally, in writing, electronically or through an authorized representative.

The ESIO acknowledges its contributors from time to time in publications and on the website. In accordance with notice given to contributors in correspondence, consent is assumed unless it is specifically withdrawn. Contributors who do not wish to be listed may opt out as indicated above. Explicit consent is sought from living donors and existing corporations for donor recognition opportunities, such as plaques, written profiles inclusion in publications like magazines and newsletters, and/or special profiles posted on the ESIO website.

Personal information for employees or volunteers of the ESIO is collected, used or disclosed solely for the purposes of establishing, managing or terminating an employment relationship or a volunteer work relationship. Personal employee information may, in some circumstances, include a Social Insurance Number, performance reviews, etc. The ESIO can collect, use and disclose the personal information of employees and volunteers without their consent only for the purposes of establishing, managing or ending the employee or volunteer relationship.

4.3 Protection of Personal Information

Personal information gathered by the ESIO is kept in confidence. The ESIO staff is authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained. Measures are taken to ensure the integrity of this information is maintained and to prevent it from being lost or destroyed. Personal information is collected and used only for purposes that a reasonable person would consider appropriate in light of the specific circumstances.

The ESIO makes reasonable security arrangements against risks such as unauthorized access, collection, use, disclosure or disposal. Security measures have been integrated into the day-to-day operating practices of the ESIO and are outlined in various process documents. Employees are made aware of the importance of maintaining the confidentiality of personal information.

Methods of protection include physical measures (e.g. locked cabinets and doors, shredders), organizational measures (e.g. limitations on access, scheduled destruction of old information), and technological measures (e.g. security system, passwords, firewalls).

The ESIO makes reasonable efforts to ensure that personal information is accurate and complete. The ESIO relies on individuals to notify us if there are any changes to their personal information. The ESIO will update its records promptly. The ESIO will retain personal information only as long as is reasonable to fulfil the purposes for which the information was collected and/or for legal or business purposes.

5.0 Sharing of and Access to Personal Information

The ESIO will use and disclose personal information only for the purpose for which the information was collected, except as authorized by law. If ESIO wishes to use or disclose personal information for any new business purpose, the ESIO will seek and obtain the appropriate consent.

In general, personal information will not be rented, sold, or shared with any third party. However, as a regular course of business, it may be provided to those third parties that provide the ESIO with contracted services (such as mail houses, designers, printers). In cases where such transfers take place, the ESIO will ensure that the third party has comparable privacy safeguards in place.

Contributors, employees, and volunteers may at any time request access to their personal information. Full access will be given, subject to reasonable timelines to allow for information retrieval.

Grant applicants and recipients may request access to the information in their files. Access will be given to all information that was provided by the applicant. The release of information relating to decisions made by the ESIO, the Board or its Committees will be at the discretion of the ESIO.

Loan and investment applicants and recipients may also request access to the information on their files. Access will be given to all information that was provided by the applicant. The release of information relating to decisions made by the ESIO, the Board or its committees will be at the discretion of the ESIO.

6.0 Website and Electronic Information

The ESIO uses password protocols, encryption software and firewalls to ensure privacy and to protect personal and other information we have received online. Our software is routinely updated to ensure the ongoing protection of such information.

The ESIO is committed to protecting the privacy of those who use our website. This site compiles conventional log files to monitor and assess activity, including traffic and visits. This activity does not specifically identify any individual user without prior notice to the user through their use of the site.

The ESIO does not disclose information about individual visits to www.edmontonscreen.com. Neither is information on our website provided to outside companies. The information collected is solely used to improve and enhance the content and services of the website.

The ESIO uses cookies and similar tracking technologies to track the activity on our website and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to the user's browser from a website and stored on the file user's device. Tracking technologies also used are beacons, tags and scripts to collect and track information and to improve and analyze our web service.

Users can instruct their browser to refuse all cookies or to indicate when a cookie is being sent. However, if users do not accept cookies, they may not be able to fully access our web services.

As stated in 4.2 above, the ESIO will advise users of our website whether we are using cookies and advise them as to the type of information we are gathering through the use of cookies.

7.0 Contact Information

The ESIO is open about our privacy policies and procedures addressing the management of personal information and is open to reviewing any breach of this privacy policy or other reasonable standards.

Questions or concerns relating to the ESIO's privacy practices and/or the treatment of personal information should be brought to the attention of the ESIO's Finance Director.
