HAMILTON CHAMBER OF COMMERCE

Personal Information Privacy and Document Act (PIPEDA)

Policy for the Hamilton Chamber of Commerce

Introduction

Privacy protection and the confidentiality of information are fundamental to business practices at the Hamilton Chamber of Commerce (" the Chamber"). The Chamber is committed to protecting the privacy and security of your personal information obtained by reason of your relationship with the Chamber. The Chamber operates on the basis of this Privacy Policy, which explains the types of personal information it collects, how it is used, and the steps it takes to ensure your personal information is handled appropriately. The Chamber does **not** view information pertaining to the name, title, business address, telephone number, e-mail and/or web site addresses of its business members to be personal information. This policy deals only with the personal information handled by the Chamber. The Hamilton Chamber of Commerce reserves the right to change this policy and it may be updated periodically. Please check for changes regularly.

Our Privacy Policy has been designed to comply with the Personal Information Protection and Electronic Documents Act (PIPEDA) and corresponding provincial privacy acts.

Who is the Chamber?

For purposes of this Privacy Policy, "the Chamber " means the Hamilton Chamber of Commerce.

Accountability

The Chamber is accountable for all personal information under its control. The Chamber's privacy officer is Joy Shikaze, APR who is designated as responsible for the Chamber's Privacy Policy. The privacy officer can be reached at 905-522-1151 ext. 231 or **j.shikaze@hamiltonchamber.on.ca**.

Any questions about the Chamber's handling of personal information should be directed to the privacy officer. Please see below for more information about the process of referring questions about the Chamber's handling of personal information.

Purposes of Personal Information

The purpose for which the Chamber collects personal information will be identified at or before the time the information is collected. The Chamber may collect personal information for the purposes of:

- administering Chamber membership and providing member services and benefits, such as the creation and maintenance of membership lists, Business Resource Guide (virtual or printed) and databases to which the membership of the Chamber as well as third party service providers may have access, providing they have agreed to abide by this Privacy Policy.
- registering for Chamber events, for example the Annual General Meeting;
- purchasing various Chamber products or services including document certification; and
- processing and administering the above or other purposes as necessary.

The Chamber will not use personal information for any other purpose than identified at or before the time of collection.

Consent

The Chamber seeks consent for all personal information it collects, uses and discloses through information provided to individuals prior to collection, or at the time of collection.

If a person or organization voluntarily provides information, that person or organization has consented to the collection, use and disclosure of personally identifiable information as described in this Privacy Policy.

As required by the PIPEDA, the Chamber will not use personal information for any purpose other than that for which that person or organization consented.

Should the Chamber require personal information for a new purpose, it will contact the individual or organization to seek consent for that new use.

Limits for Collecting, Using, Disclosing and Keeping Personal Information

The Chamber does not collect, use or disclose personal information except when consent has been given on a voluntary basis. There may be occasions where more specific personal information is necessary for the Chamber to proceed with a request for information, or provide a product or service. In such cases, it will provide a description of the information required. In all cases, the Chamber limits the amount and type of information collected to that which is required to provide the product, or service. Whatever the case, such information will be kept strictly confidential.

With reference to the above, the Chamber will retain <u>active</u> personal information only as long as is necessary to provide the requested product, service or information. To facilitate legal reporting and retention requirements the Chamber archives <u>inactive</u> information.

The Chamber will not normally sell or otherwise provide personal information to third parties. However, in specific instances, it may transfer information to service providers in the course of its administrative procedures or member services. Whenever such personal information is transferred, the Chamber requires the service provider to respect the Privacy Policy and restricts them from using or disclosing personal information for any purpose other than the assigned provision of services. Any personal information the

Chamber retains is kept in such a manner as to ensure its security and confidentiality at all times.

Safeguarding Personal Information

The Chamber respects the privacy of our members, partners, potential website visitors and Internet users and will protect that privacy as vigorously as possible. It stores personal information in electronic and physical files that are secure.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. While the Chamber strives to protect personal information, it cannot absolutely ensure or warrant the security of any information electronically transmitted or received. Therefore, while the Chamber cannot protect information in transit, once it is received, it undertakes to ensure its security on the Chamber's servers.

Accuracy of and Access to Personal Information Collected

The Chamber makes every effort to keep personal information as accurate, complete, current and relevant as necessary for the identified purposes. The Chamber does not routinely update personal information.

The Chamber makes readily available its Privacy Policy and related procedures for managing personal information. In addition, it posts the Privacy Policy on the Chamber's web site. Questions about the handling of personal information by the Chamber may be directed to its privacy officer.

By written request, an organization or individual may review and edit their personal information as collected by the Chamber. The Chamber will inform them of what personal information it has, what it is used for and, in cases where it has been disclosed, to whom it has been disclosed.

There may be exceptional circumstances as provided by the PIPEDA under which the Chamber may not be able to give individual access to personal information. Should this be the case the Chamber will provide an explanation, as provided for in the PIPEDA.

Requests should be submitted by mail and addressed to the Privacy Officer at the address indicated above. The request should include the following information: the nature of your request, including whether you wish to view and/or edit information or to inquire about the use and/or disclosure of the information.

The Chamber will respond to your request within 30 days from the receipt of the request. If it is unable to respond within this time period, it will send a notice of explanation and extension. If the Chamber is not able to disclose all personal information, it will provide, by return correspondence, the reason for not doing so.

Questions

For questions or comments about the Hamilton Chamber of Commerce's handling of personal information, please contact the Privacy Officer.