Privacy & Information Protection Policy
YMCA of Northern Alberta
April 2024

Revision History

Review of this document is required annually.

Change Date	Approval	Change Summary

1 Background and Purpose

YMCA of Northern Alberta strives to ensure that all employees and volunteers conduct their relationship with each other, members, participants and all others with integrity, good judgement and fairness. The YMCA respects the privacy and protection of personal information of all persons and entities and accepts the responsibility to protect private and personal information.

The Privacy & Information Protection Policy governs the collection, use and disclosure of personal information held by YMCA of Northern Alberta. The principals and practices outlined adhere to the Government of Alberta's Personal Information Protection Act (PIPA) and the Government of Canada's Personal Information Protection & Electronic Documents Act (PIPED).

2 Definitions

2.1 **Must –** Not optional. Adherence to the statement is mandatory.

2.2 **Private information** – means information that a person wishes, and is entitled to keep from public viewing. Example include but are not limited to, credit card information, social security and financial account numbers, medical information, passwords, etc.

2.3 **Personal Information** – means information about an identifiable individual.

2.4 **Employee Personal Information –** means personal information that is necessary for stated employment purpose and collected by fair and lawful means.

2.5 **Record** – means a record of information in any form or in any medium, whether in written, printed, photographic or electronic form or any other form.

2.6 **Consent –** means the owner of the information approves the collection and/or use of personal information and is aware of its intended use.

3 Scope

This policy is applicable to all YMCA documents, resources, practices, actions and all employees and volunteers. This includes all external, third-party contractors and vendors.

4 Roles and Responsibilities

4.1 All YMCA employees, volunteers, external, third-party personnel and contractors are responsible for adhering to the statements and direction within the Privacy and Information Protection Policy.

4.2 All YMCA employees and volunteers with supervisory responsibilities are responsible for ensuring adherence to policy guidelines. Ultimately, the executive leadership team is responsible to ensure full compliance with policies.

4.3 The General Manager, Finance, as the Privacy Officer, will oversee the Privacy and Information Protection Policy and is responsible for its applicability and compliance. This may entail conducting periodic reviews and audits of compliance to the standard.

4.4 The General Manager, Finance, as the Privacy Officer, will review and update this policy annually to address any changes in the YMCA, related legislation, or privacy and information protection environment.

5 Related Policies and Procedures

5.1 Personal Information Protection Act (PIPA), Government of Alberta.
5.2 Personal Information Protection and Electronic Documents Act (PIPEDA), Government of Canada.
5.3 YMCA of Northern Alberta Code of Conduct.
5.4 YMCA of Northern Alberta Protection of Children, Youth and Vulnerable Persons Policy and Procedures.

6 Policy Statements

YMCA of Northern Alberta Privacy & Information Protection Policy follows the ten fair information principals as established by the Government of Canada. In addition to these principles, any collection, use or disclosure of private or personal information must be for purposes that a reasonable person would consider appropriate in the circumstances.

The following purposes would generally be considered inappropriate:

- collecting, using or disclosing personal information in ways that are otherwise unlawful;
- profiling or categorizing individuals in a way that leads to unfair, unethical or discriminatory treatment contrary to the values of the YMCA and human rights law;
- collecting, using or disclosing personal information for purposes that may cause significant harm to someone;
- publishing personal information with the intent of charging people for its removal;
- requiring passwords to social media or digital accounts for the purpose of employee screening;
- conducting surveillance on an individual using the audio, video or other functions on their own device.

Accountability – YMCA of Northern Alberta is responsible for the private and personal information it collects and under its control. The General Manager, Finance, as the Privacy Officer, is accountable for YMCA of Northern Alberta's compliance with the fair information principles.

Supervisors are responsible for the day-to-day collection, processing and safeguarding of personal information under their control. Supervisors must inform and train employees, volunteers, contactors and vendors having access to personal information on YMCA privacy protection procedures and information handling practices.

Employees, volunteers, contractors and vendors must follow the privacy and information protection practices established by the YMCA and their respective division when collecting, using, disclosing and safeguarding personal information.

Identifying purpose – The purposes for which the personal information is being collected must be clearly identified and explained to the individual(s) by the YMCA of Northern Alberta representative and provided verbally, in writing or electronically before or at the time of collection.

Consent – The knowledge and consent of the individual(s) are required for the collection, use, or disclosure of personal information except where considered inappropriate (detailed below).

In the rare occurrence that non-consensual disclosure is required, responsible consideration and accountability must be applied including the documentation of the reasons why the disclosure was determined.

YMCA of Northern Alberta may disclose personal information without the knowledge or consent of the individual only if the disclosure is:

a) For the purposes of investigating a breach of an agreement or a contravention of the laws of Canada or Alberta, or when such a breach or contravention is being or is about to be committed and it is reasonable to expect that disclosure with the knowledge or consent of the individual would compromise the investigation.
b) For the purposes of detecting or suppressing fraud or of preventing fraud that is likely to be committed and it is reasonable to expect that the disclosure with the knowledge or consent of the individual would compromise the ability to prevent, detect or suppress the fraud.
c) Where it is believed, on reasonable grounds, that the disclosure will prevent, avoid or minimize a danger to the health or safety of any person(s).

In general, the following actions by an individual constitute implied consent for the YMCA to collect, use and disclose personal information for purposes identified to the individual:

a) Registration for YMCA programs and services.
b) Account registration on electronic software.
c) YMCA membership enrollment.
d) Completion of a donation pledge form.
e) Acceptance of employment and benefits enrollment by an employee.
f) Acceptance of a volunteer position or student placement.

For most YMCA employment and community service programs, the YMCA is contractually obligated by the Government of Alberta and Government of Canada to obtain the written express consent from a participant to collect, use and disclose their personal information.

Express consent is required from an individual when dealing with sensitive personal and private information, such as financial and medical data. YMCA employee, volunteers, contractors or vendors must consult with a supervisor for more information about when express consent is required.

Individuals may at any time withdraw their consent for the YMCA's use or disclosure of their personal information, subject to certain service, legal or contractual restrictions. Individuals wishing to withdraw consent may contact the YMCA for more information regarding the implications of withdrawing consent.

Limiting collection – The collection of personal and private information must be limited to that which is needed for the purposes identified by YMCA of Northern Alberta. Information must be collected by fair, transparent and lawful means. New or revised consent must be obtained to use or disclose personal information for a new purpose.
When collecting personal information from adults 18 years or older, employees and volunteers will only collect data directly from the individual about whom the personal information pertains. Extenuating

circumstances must be presented in writing for approval to the General Manager, Finance, as the Privacy Officer.

Limiting use, disclosure and retention – Unless the individual consents otherwise or it is required by law, personal and private information can only be used or disclosed for the purposes for which it was collected. Personal and private information must only be kept as long as required to serve those purposes, and/or as required by law, and/or by contract with a funding partner.

YMCA of Northern Alberta follows the Canada Revenue Agency requirements for the retention and destruction of records, which establishes a retention period of seven (7) years for most information, along with the requirement for permanent retention for specified documents and information.

Provincial and federal legislation, along with requirements by insurance companies and program funders may also require retention periods in excess of the minimum seven (7) year retention period for certain records and information. Examples include, but are not limited to, employee and volunteer personnel files, which must be retained permanently to meet insurance requirements.

Vice Presidents, or established delegates, are responsible for the establishment and communication of records retention and destruction requirements for respective program or service areas. Managers shall maintain schedules for records retention and destruction, which apply to personal information that is no longer necessary or relevant for the identified purposes. Such information shall be destroyed, erased or rendered anonymous.

Accuracy – Personal and private information must be as accurate, complete, and up to date as possible in order to properly satisfy the purposes for which it is to be used. Employees and volunteers are responsible for their own personal information and must contact People & Culture if they are aware of any changes or inaccuracies in their personal information.

Safeguards – Personal and private information must be protected by appropriate security relative to the sensitivity of the information. This applies to collection, storage and disposal of information. Also, actions must be taken to limit and monitor employee access to personal information, and take appropriate action when information is accessed without authorization.

Employees, volunteers, contractors or vendors with access to personal and/or private information are required, as a condition of employment or volunteer role, to respect the confidentiality of personal information.

Personal information shared with a third party for processing shall be protected through contractual agreements with requirements for confidentiality and appropriate safeguards. All employees must protect personal information in their control (regardless of format) against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security safeguards.

Safeguards may include physical measures (such as locked doors, locked file cabinets), organizational measures (such as limited access, security clearances) and technological measures (such as passwords, encryption, security patches). In the event that any employee, volunteer, contractor or vendor is unsure how to protect personal and private information, they are responsible to seek support from a supervisor or from the General Manager, Finance, as the Privacy Officer.

Openness – YMCA of Northern Alberta has made detailed information about policies and practices relating to the collection, management and storage of personal information publicly and readily available on ymcanab.ca.

Individual access – Upon request, an individual(s) must be informed of the existence, use, management, storage and disclosure of their personal information and be given access to that information.

An individual(s) can challenge the accuracy and completeness of the information and have it amended as appropriate. All challenges must be directed in writing by the challenger to the General Manager, Finance, as the Privacy Officer.

Employees and volunteers can request access to their employee file by contacting People & Culture.

Challenging Compliance – An individual can challenge the YMCA of Northern Alberta's compliance with the above principles. The challenge should be mailed or emailed to the General Manager, Finance, as the Privacy Officer and contain the following:

- Name, mail and electronic address where the individual prefers to be reached.
- Nature of the complaint and all relevant details.
- Name and title of employee where request originated, if applicable.

The YMCA will review all challenges. If a challenge is found to be justified, the YMCA shall take appropriate measures to resolve the challenge. Current policy and contact information can be found at ymcanab.ca.

7 Policy Compliance and Exceptions

7.1 All users are strictly required to comply with the statements established in this Privacy and Information Protection Policy. Non-compliance may result in disciplinary action up to and including termination of employment.

7.2 Any exceptions to this standard must be formally and thoroughly documented and addressed directly to the General Manager, Finance, as the Privacy Officer for approval.

7.3 All queries related to the YMCA Privacy and Information Protection Policy should be directed to the General Manager, Finance, as the Privacy Officer.