

# Manitoba 4-H Council Inc. Privacy Policy

#### **BACKGROUND**

We want to make sure that we comply with the new legal obligations imposed by the Federal Government's *Personal Information Protection and Electronic Documents Act* ("*PIPEDA*") regarding the collection, use and disclosure of personal information in commercial activities. It is recognized that the Manitoba 4-H program may not fall within the commercial activities category and as such be exempt from PIPEDA. But in keeping with other non-profit organizations and Canadian 4-H Council, we are proceeding to adopt a Privacy Policy in a proactive and responsible manner. Manitoba 4-H Council values the trust of those we deal with and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the information clients have shared with us.

We have adopted as the foundation of our Privacy Policy the 10 Principles that are set out in the National Standard of Canada entitled "Model Code for the Protection of Personal Information" and that form part of PIPEDA. Our objective is to promote responsible and transparent personal information management practices.

As we are following the PIPEDA practices, please recognize that we will regularly review and update our policies and procedures and privacy law can be expected to evolve in Canada. This will cause us to amend and improve our Privacy Policy over time.

#### **SCOPE AND APPLICATION**

The scope and application of our Privacy Policy is as follows:

The ten principles which form the basis of our Privacy Policy are interrelated, and we will strive to adhere to them as a whole.

Our Privacy Policy applies to personal information about our 4-H clients, including and not limited to members, volunteers, donors, sponsors and stakeholders that we collect, use or disclose in the course of our program's activities. By enrolling in the 4-H program, 4-H clients agree that their personal information will be collected, used and disclosed for the purposes of keeping them informed and delivering 4-H programs, services and opportunities and for statistical and archival purpose.

Our Privacy Policy applies to the management of personal information in any form, whether written, oral or electronic.

Our Privacy Policy does not impose any limits on our collection, use or disclosure of any of the following information:

an individual's name, address and telephone number that appears in a telephone directory that is available to the public, where the individual can refuse to have their personal information appear in such a directory;

an employee's name, title, business address or telephone number; or

other information about an individual that is publicly available or that is specified by regulation pursuant to PIPEDA.

5. The application of our Privacy Policy is subject to the requirements and provisions of PIPEDA, the regulations enacted thereunder and any other applicable legislation, regulation, court order or other lawful authority.

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# 8-PRIVACY POLICY GOVERNING PRINCIPLES

## Principle 1 - Accountability

We are responsible for personal information in our possession or under our control.

#### Principle 2 - Identifying Purposes for Collection of Personal Information

We will identify the purposes for which personal information is collected at or before the time the information is collected.

# Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of an individual are required for the collection, use or disclosure of personal information, except where publicly available.

#### **Principle 4 - Limiting Collection of Personal Information**

We will limit the collection of personal information to that which is necessary for the purposes that we have identified. We will collect personal information by fair and lawful means.

# Principle 5 - Limiting Use, Disclosure, and Retention of Personal Information

We will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law. We will retain personal information only as long as necessary for the fulfillment of the purposes for which it was collected.

# **Principle 6 - Accuracy of Personal Information**

Personal information will be as accurate, complete, and up to date as is necessary for the purposes for which it is to be used.

# **Principle 7 - Security Safeguards**

We will protect personal information through the use of security safeguards appropriate to the sensitivity of the information.

#### **Principle 8 - Openness Concerning Policies and Procedures**

We will make readily available to our 4-H clients specific information about our policies and procedures relating to our management of personal information.

# **Principle 9 - Access to Personal Information**

We will inform an individual of the existence, use and disclosure of his or her personal information upon request, and will give the individual access to that information. An individual will be able to challenge the accuracy and completeness of the information and request to have it amended as appropriate.

## **Principle 10 - Challenging Compliance**

An individual will be able to address a challenge concerning compliance with the above principles to our Privacy Officer.

## **ADDITIONAL INFORMATION**

For more information regarding our Privacy Project, please contact our Privacy Officer:

Executive Director, Manitoba 4-H Council 1129 Queens Avenue Brandon, Manitoba R7A 1L9

Phone: 204-901-1813

For a copy of PIPEDA or to contact the Privacy Commissioner of Canada, please visit the Office of the Privacy Commissioner of Canada's web site at: <a href="https://www.priv.gc.ca">www.priv.gc.ca</a>

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