



Components of a Privacy Policy

Company Name _____

Company Address _____

INTRODUCTION

Information	Questions to consider	Included
It should be indicated that this Privacy Policy is a live document and your organization may make changes to it in the future. Advise that where changes are significant, your organization may notify by e-mail; otherwise, users should check back frequently to see any updates or changes.	How will a list of email addresses be kept? Determine what changes are "significant"	
Clearly state the intent or purpose of this policy.	Who is it intended for (members, clients, customers and/or employees)? Be Specific.	
Consider the language and style of this policy. Try as much as possible to use plain language.	Does the language suit your clientele or users and is it easy to read and follow?	
Include a brief overview of your organization.		
Indicate if this policy is a public or private document. (internal/ website etc.)	Where can people access this policy if they need to?	
If applicable, refer to other relevant policies and procedures within your organization.		
Explain that personal information will be handled by your organization in accordance with the privacy policy and PIPEDA and/or other provincial legislation and any applicable laws, regulations, codes etc.	If you operate solely within one province, does your provincial legislation supersede the federal legislation?	

DATA COLLECTION

Information	Questions to consider	Included
Describe what types of data your organization collects and why.	Do you maintain membership, donor, or purchase lists (for how long)?	
Describe what is meant by Personal Information.		
Describe how consent from individuals will be obtained (express or implied).	Are you seeking consent in writing? Do you have a written form for the individual to sign? Does it require them to positively agree to the use of their information or ask them to indicate if they do not want their information shared? If you use a written form, where will you keep the signed consent? Is it electronic?	
When consent is implied, the organization assumes that the person to whom the personal information pertains to have agreed to its collection and use for a specific purpose without having requested or received any explicit affirmation.	Are you asking for implied consent? Have you indicated your intentions for use or sharing of the information without asking explicitly for their consent? Have you stated clearly your reason for collecting the information? Is implied consent adequate?	

Chart continues on next page.

DATA COLLECTION

Information	Questions to consider	Included
Describe what methods your organization uses to collect personal information – e.g. telephone or e-mail.	Do you collect and/or keep information on forms in: hard copy, on computers, and/or on your website? What security is necessary to protect the information given the location and format that information is kept?	
Indicate that the information is necessary of the activities of the organization.	Can you assure stakeholders that the data is collected only for the purpose stated?	
Indicate that your website uses cookies to distinguish between other users of your website. A Cookie Policy can be developed for detailed information on the cookies that are used and the purposes for which you use them.	Do we need cookies for user name and password? Do we need cookies for Language or setting preferences? What other items would require cookies?	

USE OF DATA

Information	Questions to consider	Included
Generally, describe how the organization will use the personal information collected.	Will the data be used for more than one purpose? How do you propose to obtain express consent? Depending on the purpose, express consent may be more appropriate.	

DISCLOSURE

Information	Questions to consider	Included
Describe under what circumstances the information might be disclosed, if any.	Is the disclosure necessary and proper in the discharge of the institution's functions? Will the information be disclosed by third parties? Examples of third parties: your partners; clients; sub-contractors and advisers; agents and suppliers; government and law enforcement agencies; publicly available online sources, such as your own websites, social networks and your registries If so, how do you propose to obtain consent and what additional measures will you need to have in place to protect the security of the information (e.g. contractual obligations)?	
Provide examples or instances where the information will be used.	Do third party services, such as fundraisers or marketing agents need to access the information to perform their duties? Could sharing the information provide the opportunity for third parties to promote products or services to the stakeholder whose information you are providing? What consent and security measures are necessary for the above?	

USE OF DATA IN MARKETING OR FUNDRAISING

Information	Questions to consider	Included
Include an explanation of how data will be used if the organization implements a direct marketing campaign or other type of fundraising event.	How many hands will the information pass through? Remember outside vendors and volunteers.	
You must have options for individuals to opt in or out of marketing campaigns.		
If applicable, explain how the organization deals with information in third party contracts and if names are shared	Can your organization assure stakeholders that third parties will maintain comparable levels of protection(e.g. does your contract with the third party provide for this)?	

ACCURACY (INTEGRITY OF DATA)

Information	Questions to consider	Included
Describe steps taken to ensure information is accurate, complete and up to date.	How often will you check with your stakeholders to be sure the information is accurate?	
Describe how an individual can correct personal information. Example: to submit a correction request, contact XXX. The fee for correcting data is XX		
If a correction request is refused, inform the person being denied access of his or her right to appeal to the IPC within 30 calendar days or receiving the government institution's response. An appeal fee may apply.		

SECURITY

Information	Questions to consider	Included
Show that reasonable steps have been taken by the organization to safeguard personal information in the event of misuse, loss, unauthorized access, or disclosure.	What security measures are in place for print and digital records? If material is stored or collected off site – what systems or measures are in place to safeguard it?	

DISPOSAL OF RECORDS

Information	Questions to consider	Included
Explain what reasonable steps will be taken to permanently dispose of records when no longer required.	How long is the personal information retained? Personal information should only be kept for as long as necessary to fulfill the purposes for which it is collected. It should also be kept long enough for the individual to be able to access it and appeal any denial of access. How will you dispose of print and digital copies of records? Are archived records that must be kept to comply with legal requirements separated from the current data base?	

ACCESS TO THE INFORMATION

Information	Questions to consider	Included
Explain an individual's right to his or her own personal information.	What format will personal information be provided in?	
Indicate who has access to the information.	Is the information accessible to staff, board members, and volunteers? Does anyone else have access? Do only those people with a legitimate need for the information have access to it?	
Describe when access might not be allowed, if any. If access request is refused, the person being denied access of his or her right can appeal to the IPC within 30 calendar days of receiving the government institution's response. An appeal fee may apply.	What timeframe will the information be provided in?	
Explain when fees will be charged for providing the information to the person it pertains to, if any.	Will you charge a fee for processing the information request or the related photocopying costs?	

ORGANIZATIONAL CONTACT

Information	Questions to consider	Included
Identify how and who to contact in the organization regarding the policy.	In addition to who and how, what is your timeliness of replies to inquiries?	
Explain how complaints can be made and to whom.		

DATE	CHANGE	EDITED BY:	APPROVED BY: