

Community Opportunity Foundation of Alberta

External Party Privacy Policy

1. OBJECTIVE & SCOPE OF POLICY

This policy applies to the collection, use and disclosure of personal information of external third parties within the control of the Community Opportunity Foundation of Alberta (the "Foundation").

The Foundation respects the privacy of External Parties and has prepared this policy to inform you of its policy concerning the collection, use and disclosure of the Personal Information about an External Party. This policy has been built upon the values established by the Canadian Standards Association's *Model Code for the Protection of Personal Information*, the *Personal Information Protection and Electronic Documents Act* (Canada), and relevant provincial legislation, including the *Personal Information Protection Act* (Alberta) and the *Personal Information Protection Act* (British Columbia).

2. DEFINITIONS

For the purposes of this policy:

"External Party" means any individual except for an individual in their capacity as a prospective, present or former employee of the Foundation;

"Personal Information" means any information, recorded in any form, about an identifiable individual, other than the name, title or business address or telephone number of an employee of an organization. Personal information also does not include anonymous or non-Personal Information . Anonymous or non-Personal Information is information that cannot be associated with or traced back to an identifiable individual.

3. THE COLLECTION & USE OF PERSONAL INFORMATION

As an External Party, your provision of Personal Information to the Foundation means that you agree and consent that the Foundation may collect, use and disclose your Personal Information in accordance with this policy. If you do not agree with these terms, do not provide any Personal Information to the Foundation.

Subject to the limitations outlined below, you may, at any time, withdraw the consent given by notifying the Foundation in writing of such withdrawal.

Certain Personal Information is required to be collected, used and disclosed by the Foundation in the course of its relationship with you. Any withdrawal of consent may affect certain aspects of your relationship with the Foundation, including your no longer being eligible for certain benefits, goods and services provided by the Foundation, its affiliates or third parties to the extent the Personal Information affected by the withdrawal of your consent was necessary to provide such benefits, goods or services.

Further, certain Personal Information is collected, used and disclosed by the Foundation as a result of legal, contractual, regulatory or other requirements, and your general ability to withdraw or refuse to consent to the collection, use or disclosure of your Personal Information by the Foundation does not imply or confer upon you the right to withdraw or refuse your consent where to do so would interfere with such legal, contractual, regulatory or other requirements.

The Foundation collects, uses and discloses Personal Information about individuals participating in or impacted by the Foundation's business activities, including its development and production activities.

Personal information will be collected, to the extent possible, directly from the individual concerned.

4. MONITORING

In the course of conducting its operations, the Foundation may monitor the activities of individuals in respect of its operations and its property.

5. DISCLOSURE OF PERSONAL INFORMATION

The Foundation utilizes the services of third parties in its operations. The Foundation will share Personal Information with such third parties where they require such information to permit the Foundation to conduct its activities.

Personal Information will only be provided to such organizations if they agree to use such information solely for the purposes of providing services to the Foundation and under the instruction of the Foundation and, with respect to that information, to act in a manner consistent with the relevant principles articulated in this policy.

The Foundation will also collect, use and disclose Personal Information directly or indirectly through third parties. In such circumstances, the Foundation takes reasonable measures to ensure that the Personal Information collected, used or disclosed, is done so in compliance with the terms of this policy.

There are circumstances where the use and/or disclosure of Personal Information may be justified, permitted, or required without consent. Such circumstances may include:

- where required by law or by order of a court, administrative agency or other governmental tribunal;
- where the Foundation believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety or property of an identifiable person or group;
- where it is necessary to permit the Foundation to pursue available remedies or limit any damages that it may sustain; and
- where the information is public.

Where obliged, permitted, or required to disclose information without consent, the Foundation will not disclose more information than is reasonably required under the circumstances.

6. ACCURACY

The Foundation endeavours to ensure that any Personal Information provided to it by an External Party and in the Foundation's possession is as accurate, current and complete as necessary for the purposes for which it uses that data.

7. RETENTION

The Foundation retains Personal Information as long as it believes it is necessary to fulfil the purpose for which it was collected, or as long as it is required for business or legal reasons.

8. SECURITY

The Foundation endeavours to maintain adequate physical, procedural and technical security with respect to its offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of Personal Information.

The Foundation further protects Personal Information by restricting access to it to those employees and others (individuals and organizations providing services to the Foundation) that it determines need to know that information in order that the Foundation may carry out its business. The Foundation has a policy under which employee misuse of Personal Information is treated as a serious offence for which disciplinary action may be taken.

9. ACCESS TO PERSONAL INFORMATION

Except where permitted or required by law, the Foundation permits access to and review of Personal Information held by the Foundation about an individual by the individual concerned.

Upon receipt by the Privacy Officer (see "Privacy Officer" below for details) of a written request by an individual, the Foundation will, subject to the terms of this policy, provide that individual access to the personal information requested within a reasonable time. Where such time is expected to be longer than 30 days following such request, the Foundation will advise the individual of the reason for the delay.

The Foundation will only provide access where the written request contains sufficient detail to enable it, with reasonable effort, to identify the information in respect of which the written request is made. Should an individual require assistance with the submission of a written request, please contact the Privacy Officer.

While the Foundation's response will generally be provided at no cost, each individual making a request will be informed in advance of any charges that apply in connection with the information request. Charges may relate, for example, to the transcription, reproduction or transmission of Personal Information.

To guard against improper or fraudulent requests for access, the Foundation will require sufficient information to allow it to confirm that the person making the request is authorized to do so before granting access or making corrections.

If an individual believes any Personal Information concerning that individual is not correct, that person may request an update of that information by sending a request to the Privacy Officer. The

Foundation reserves the right not to change any Personal Information but will append any alternative text the individual concerned believes appropriate.

The Foundation reserves the right to restrict access to Personal Information where the information requested:

- a) Would disclose the Personal Information, including opinions, of another individual or of a deceased individual;
- b) Would disclose trade secrets or confidential information that may harm the Foundation or the competitive position of a third party or interfere with contractual or other relationships of the Foundation or a third party;
- c) Is subject to solicitor-client or litigation privilege;
- d) Could reasonably result in: (i) serious harm to the treatment or recovery of the individual concerned; (ii) serious emotional harm to the individual or another individual; or (iii) serious bodily harm to another individual;
- e) May harm or interfere with law enforcement activities and other investigative or regulatory functions;
- f) Is not readily retrievable and the burden or cost of providing would be disproportionate to the nature or value of the information; or
- g) Does not exist, is not held, or cannot be found by the Foundation.

If the Foundation decides not to provide an individual with access to their Personal Information, it will provide the individual making the request with an explanation as to why the request has been all or partially denied.

Where information will be disclosed, the Foundation will endeavor to provide the information in question within a reasonable time and no later than 45 days following the request, or where otherwise provided by law.

The Foundation will not respond to repetitious or vexatious requests for access. In determining whether a request is repetitious or vexatious, it will consider such factors as the frequency with which information is updated, the purpose for which the information is used, and the nature of the information.

The Foundation will from time to time review and revise its privacy practices and this policy. Policy changes will apply to the information collected from the date of the revised policy statement as well as to existing Personal Information about External Parties held by the Foundation.

10. PRIVACY OFFICER

In order to ensure compliance with this policy, the Foundation has appointed Privacy Officers to oversee all aspects of the Foundation's privacy policy and practices. If an individual wishes to know what information the Foundation currently has about them, they should send a written request to the Privacy Officer, in the manner described above. If an individual becomes aware that the information the company has about them is incorrect, they should notify the Privacy Officer, who will review the information and take appropriate steps to address the individual's concerns. You may e-mail the Privacy Officer at info@saveoursalmon.ca, or you may contact the Privacy Officer at (403) 720-6050.

11. QUESTIONS

If an individual has questions with respect to the Foundation's privacy policy or practices, or with the result of their request to access or correct their personal information, they should address their questions, in writing, to the Privacy Officer. The Privacy Officer will then endeavour to answer such questions, report back to the individual and advise them of any steps taken to address any issues raised by the individual. If the individual is unsatisfied with the response, they may be entitled to make a written complaint to the Federal or Provincial Privacy Commissioner (where applicable).

12. WHAT YOU CONSENT AND AGREE TO

In summary, when you provide the Foundation with Personal Information, you consent and agree to the following:

- ❑ *The collection, use and disclosure of Personal Information from or about you as described in [Section 3](#), [Section 4](#) and [Section 5](#) and to your right to access and correct data as described in [Section 9](#).*
- ❑ *Your acceptance of the risks concerning the transmission of information to the Foundation as described in [Section 8](#).*

If you wish to change your consent at any time, please write or contact the Foundation's Privacy Officer as indicated in this policy.