



# Privacy Policy & Procedures

## Introduction

NISCL has always valued your privacy and acts to ensure that it is protected. We have established this Privacy Policy to put into writing our current practices to respond to requirements that organizations have written privacy policies under the Personal Information Protection and Electronic Documents Act (PIPEDA).

PIPEDA sets out ground rules for how organizations can collect, use or disclose personal information in the course of commercial activities. It balances an individual's right to privacy with the need of organization to collect, use or disclose personal information for legitimate business purposes.

This Privacy Policy describes how NISCL collects, protects and discloses the personal information of members, employees, and customers and the rights of these individuals with respect to their personal information.

## Accountability

NISCL is accountable for the protection of all personal information within the association's possession or control, including any personal information that has been transferred to a third party for regulatory, legal or processing purposes. NISCL will require a comparable level of protection of this information from its third party.

Any concern or issue about NISCL's personal information handling practices may be made, in writing, to our Privacy Officer. Upon verification of the individual's identity, the Privacy Officer will act promptly to investigate the complaint and provide a written report to the individual. If the individual is dissatisfied with the report provided by the Privacy Officer or feels that the corrective action taken by NISCL is insufficient, the individual may direct a complaint to the Federal Privacy Commissioner in writing.

## What is Personal Information?

Under PIPEDA, personal information means any information that is identifiable to an individual, including name, home address, home telephone number, social insurance number, and date of birth. It also includes, but is not limited to, other information relating to identity, such as, nationality, gender, marital status, financial information and credit history.

## Use and Purposes for Collecting Personal Information

NISCL collects and uses personal information such as name, birth date, home mailing address, home telephone number, income and age. We use personal information to:

- communicate with our members to understand their needs and preferences in order to provide services and products that ensure member satisfaction;
- inform members about NISCL programs, services and events;
- enroll an individual in a program or seminar;



- verify identity;
- record and maintain membership records;
- compile a membership roster/directory that is available to NISCL members and staff
- develop, enhance, market or provide products and services;
- manage and develop Association business and operations, including personnel and employment matters; and,
- meet legal and regulatory requirements
- advise employers of your membership status upon request
- compile a designation registry page for credential verification.

## Consent

We require the knowledge and consent of our members, customers, and employees for the collection, use or disclosure of their personal information, except where inappropriate. In certain circumstances we can collect, use or disclose personal information without the knowledge and consent of the individual. For example:

- where legally authorized or required by law to do so without consent;
- when it is clearly in the best interest of the individual and consent cannot be obtained in a timely way, such as when the individual is seriously ill;
- an emergency where the life, health or security of an individual is threatened;
- employee personal information if it is reasonable for the purposes of establishing, managing or terminating an employment relationship between NISCL and the individual; and,
- to a third party to collect a debt, comply with a subpoena, warrant or other court order.

Furthermore, we may transfer your personal information to a third party in the event of a reorganization, joint venture, assignment, or other business transaction involving all or part of our company or affiliates.

NISCL will get consent to use and disclose personal information at the same time it collects the information.

Members, customers or employees can consent orally, in writing or electronically and their consent may be implied or express depending on the nature and sensitivity of the personal information.

Members, customers or employees are considered to have given implied consent when the purpose for collecting, using or disclosing personal information is considered obvious and they have voluntarily provided the personal information for that obvious purpose.

Consent can be withdrawn at any time subject to legal or contractual restrictions and reasonable notice.

## Limiting Collection

NISCL will limit the type and amount of personal information it collects to that which is necessary for the business of the Association.

We will not collect, use or disclose personal information except for the identified purposes unless we have received further consent from you.

The Association will collect personal information fairly, openly and lawfully in accordance with PIPEDA.



## Limiting Use, Disclosure and Retention

We will not use or disclose personal information for any purposes other than those needed to conduct business. Personal information will be retained only as long as necessary for fulfillment of those purposes.

NISCL will disclose whether or not a member has the Certified Supply Chain Leader (CSCL) designation to an employer if asked.

In addition, we may disclose personal information without knowledge or consent to a third party to collect a debt, comply with a subpoena, warrant or other court order, or as may be otherwise required or authorized by law.

## Accuracy

The Association endeavors to ensure that all personal information in active files is accurate, current and complete. When a member notifies NISCL that his or her personal information requires correction or updating, or if the member is unable to make the changes, the necessary changes are made by NISCL staff. Personal information contained in closed files is not updated.

## Safeguards

We use a number of physical, organizational and technological measures to safeguard personal information from unauthorized access or inadvertent disclosure. For example:

**Physical** – active files are stored in locked filing cabinets located in restricted work areas to NISCL employees and authorized volunteers. Closed files are stored in locked cabinets for a period of seven years, after which, the information is shredded prior to disposal.

**Organizational** – NISCL employees, volunteers, and third-party service providers sign confidentiality agreements binding them to safeguarding the confidentiality of personal information to which they have access.

**Technological** – personal information contained on NISCL computers and the electronic database is encrypted. Also, the Internet server or router has firewall protection to protect against virus attacks and hacking into the database.

**Electronic Transmission of Information** – notwithstanding the technological safeguards implemented by NISCL, all Internet transmissions are susceptible to possible loss, misrouting, interception and misuse. For this reason, as part of the application that members sign consenting to their personal information being collected, used, retained and disclosed, NISCL will assume that it has the individual's consent to communicate via the Internet unless notified to the contrary.

## Openness

The Association will make available to members, customers and employees' specific information about its policies and practices relating to the management of personal information. In addition, our Privacy Officer will answer any questions about our policies and procedures in the management of personal information that is under our control.



## Individual Access

At all times members, customers and employees have the right to access their personal information that we have in our possession. On written request to our Privacy Officer, an individual will be informed of the existence, use and disclosure of the personal information that is under our control and shall be given access to that information. An individual will be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

## Challenging Compliance

If you feel at any time that we are not complying with the principles set out in the Act, please contact our Privacy Officer.

## Community Sites

Members are notified that the information they share on community websites, including e-mail addresses, will be available to all persons accessing the community site, and that such information may be read, collected or used by others for any purpose, including sending members' unsolicited messages. Members are informed that NISCL is not responsible for any information they elect to submit to community sites, or the use of such information.

## Cookies

A cookie is a small text file that a website puts on a visitor's hard disk, usually so that site can remember something about the visitor at a later time.

Most Internet browsers by default allow sites to install cookies on a visitor's hard drive. The user can set his or her browser to disable cookies, or to give an option to accept or reject a cookie every time a site offers one.

NISCL uses traffic log cookies to identify NISCL web pages that are being accessed. This helps the Association analyze data about web page traffic and improves the website in order to tailor it to customer needs. NISCL only uses this information for statistical analysis purposes. Such data is subsequently removed from the NISCL system.

Members are notified when we send them an electronic notification informing them fully about what personal information we are trying to collect, why the information is being collected, and what the Association plans to do with the information and how this information will be protected. In addition, we ask members for their consent in gathering personal information and inform them fully and accurately about what personal information we are collecting, why it is being collected, what we intend to do with the information, and how it will be protected.

## Amendments to Our Privacy Policy

We may update our Privacy Policy from time to time to reflect amendments in applicable Federal and Provincial laws. Any changes to this Privacy Policy will be posted on our website and will become immediately effective when published in a revised Privacy Policy. We may also communicate the changes through our services or by other means.



## CONTACT INFORMATION

Members, customers or employees having any questions regarding NISCL's Privacy Policy, Information Security, Retention and Destruction Policy, and/or this Privacy Policy, or who wish to make an access to personal information request, are instructed to contact:

Privacy Officer NISCL

1 Dundas Street West, Suite 2704

P.O. Box 64

Toronto, Ontario M5G 1Z3

E-mail: [info@niscl.ca](mailto:info@niscl.ca)

Telephone: 416-977-7566

Fax: 416-977-4135