



Superior North CFDC
SADC Supérieur Nord

PRIVACY POLICY

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1. Purpose of Superior North Community Futures Development Corporation Privacy Policy

Superior North Community Futures Development Corporation (CFDC) is a federally supported not-for-profit community organization with a volunteer Board of Directors and professional staff whose purpose is to develop and diversify local economies in the catchment located between Dorion and Manitouwadge, Ontario. Superior North CFDC supports community economic development and small business growth by developing and implementing strategic community plans, delivering a range of counseling and information services to small and medium businesses and operating locally controlled investment funds to provide repayable financing to new and existing businesses.

This privacy policy has been developed to comply with Canada's Personal Information Protection and Electronic Documents Act ("PIPEDA"). PIPEDA sets out rules for the collection, use and disclosure of personal information in the course of commercial activity as defined in the Act. Superior North CFDC's Privacy policy reflects the requirements of all applicable legislation including the Freedom of Information and Protection of Privacy Act (FIPPA).

Superior North CFDC strives to protect and respect personal information of its clients, businesses, members, directors, employees and stakeholders in accordance with all applicable regional and federal laws. Each staff member of Superior North CFDC must abide by this organization's procedures and practices when handling personal information.

1.1 The Ten Principles of PIPEDA Summarized

The ten Principles of PIPEDA that form the basis of this Privacy Policy are as follows:

1. **Accountability:** organizations are responsible for the personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the PIPEDA principles.
2. **Identifying Purposes:** organizations are to explain the purposes for which the information is being used at the time of collection and can only be used for those purposes;
3. **Consent:** organizations must obtain an Individual's express or implied consent when they collect, use, or disclose the individual's personal information, except where inappropriate;
4. **Limiting Collection:** the collection of personal information must be limited to only the amount and type that is reasonably necessary for the identified purposes. Information shall be collected by fair and lawful means;
5. **Limiting Use, Disclosure and Retention:** personal information must be used for only the identified purposes, and must not be disclosed to third parties unless the Individual consents to the alternative use or disclosure. Personal information shall be retained only as long as necessary for the fulfillment of those purposes;
6. **Accuracy:** organizations are required to keep personal information in active files accurate and up-to-date;
7. **Safeguards:** organizations are to use physical, organizational, and technological safeguards to protect personal information from unauthorized access or disclosure.
8. **Openness:** organizations shall make readily available to individuals specific information about its policies and practices relating to the management of personal information;

9. Individual Access: an individual has a right to access personal information held by an organization and to challenge its accuracy and completeness if need be, and have it amended as appropriate;
10. Provide Recourse: organizations are to inform clients and employees of how to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.

This Privacy Policy applies to Superior North CFDC's Board of Directors, members, employees and contracted employees. The Board of Directors and members will be requested to sign a release of personal information as necessary and when their personal information is disclosed in public forums. A copy of the release is located at the end of this policy as Appendix 1.

All staff who are employed with Superior North CFDC will be requested to sign a release of personal information as necessary and when their personal information is disclosed in public forums. A copy of the release will be kept in each employee's confidential personal file. A copy of the release is located at the end of this policy as Appendix 2.

As well, Superior North CFDC ensures that all third party service providers sign confidentiality agreements prior to any transfer of an individual's personal information in the course of providing the business loans, business development advice, and other related information and/or services.

1.2 Definitions

"Personal information" means any information about an identifiable individual. It includes without limitation, information relating to identity, nationality, age, gender, address, telephone number, e-mail address, Social Insurance Number, date of birth, marital status, education, employment health history, assets, liabilities, payment records, credit records, loan records, income and information relating to financial transactions as well as certain personal opinions or views of an Individual.

"Business information" means the business name, business address, business telephone number, and name of owner, officer and director, job titles, business registration numbers (HST and source deductions), financial status. Although business information is not subject to PIPEDA, confidentiality of business information will be treated with the same security measures by Superior North CFDC staff, members and Board members, as is required for individual personal information under PIPEDA.

"Client" means the business that is applying for or has been approved for a loan, including sole proprietorships and individuals carrying on business in a partnership;

"Individual" means the client's owner(s) or shareholders, co-signors, and/or any guarantor associated with a client.

"Member" means a person who volunteers on a Superior North CFDC committee, but who is not a current or active board member, or chair of the committee.

"Director" means any Superior North CFDC member who has been elected or holds a position on the Board of Directors including the Chairperson.

"Employee" means any individual who is employed or has signed an employment agreement with the Superior North CFDC including the General Manager.

"Application" means the application form or related forms completed by the individual(s) to request financing for the client through the Investment Fund of Superior North CFDC.

"Database" means the list of names, addresses and telephone numbers of clients and individuals held by Superior North CFDC in the form of, but not limited to, computer files, paper files, and files on computer hard-drives.

"File" means the information collected in the course of processing an application, as well as information collected/updated to maintain/service the account.

"Express consent" means the individual signs the application, or other forms containing personal information, authorizing Superior North CFDC to collect, use, and disclose the individual's personal information for the purposes set out in the application and/or forms.

"Implied Consent" means the organization may assume that the individual consents to the information being used, retained and disclosed for the original purposes, unless notified by the individual.

"Third Party" means a person or company that provides services to Superior North CFDC in support of the programs, benefits, and other services offered by Superior North CFDC, such as other lenders, credit bureaus, persons with whom the individual or client does business, but does not include any Government office or department to whom Superior North CFDC reports in the delivery of such programs, benefits or services.

1.3 Privacy Officer

Superior North CFDC assumes full accountability for the personal information within its possession and control. This organization has appointed a Privacy Officer as the custodian of all privacy matters and legal compliance with privacy laws. The Privacy Officer's duties will be assumed by the General Manager. The General Manager's job description reflects the responsibility for controlling personal information as required by law.

The duties of the Privacy Officer are to promote privacy as a corporate value; to intervene on privacy issues across the organization when needed; and to ensure that sufficient and appropriate resources are allocated for implementing privacy policies, managing privacy risks and ensuring periodic assessments are done to see if privacy policies are being met. The Privacy Officer is also responsible for training all staff, members and Board of Directors in the organization's privacy policy.

1.4 Disseminate Information to the Public

Superior North CFDC has developed this Privacy Policy to explain in plain language, the organization's privacy policies, practices and procedures to clients and the general public. The Privacy Policy will clearly specify how individuals may: obtain access to their personal information; correct their personal information; make inquiries about the organization's privacy policy; and complain about the organization's privacy practices. This policy will be available in both Official Languages on the Superior North CFDC website.

2.0 Purposes of Collecting Personal Information

Personal information is collected in order to assess the eligibility of the individual completing an application for financial assistance; as well as to report to FedNor and to complete special projects as outlined in the Superior North CFDC Business Plan. The individual is the main source

of information but Superior North CFDC will also ask to obtain information directly from a third source where the individual does not have the required information.

Only that information which is required to make a determination of an individual's eligibility will be collected; only the information necessary to meet FedNor reporting requirements will be collected; and only the information necessary to complete special projects for the Corporation's annual Business Plan will be collected. Clients will be advised at each instance why this personal information is being collected by the employee of Superior North CFDC. Although the individual's Social Insurance Number may be requested in the application for confirming identification of the individual to the credit reporting agency, provision of this personal information is optional. The individual may provide alternative forms of identification, such as date of birth and driver's license number. All clients will be asked before using their personal information for any purpose not identified at the time of collection.

3.0 Consent

An individual's express, written consent will be obtained before or at the time of collecting personal information. The purposes for the collection and the use or disclosure of the personal information will be provided to the individual at the time of seeking his or her consent. Once informed consent is obtained from the individual to use his or her information for those purposes, Superior North CFDC has the individual's implied consent to collect or receive any supplementary information that is necessary to fulfill the same purposes. Express consent will also be obtained if, or when, a new use is identified.

By signing the loan application and/or other forms, implied consent is granted by the individual to obtain and/or to verify information from third parties such as banks, credit bureaus, other lenders, and insurance companies in the process of assessing the eligibility of an individual or client. Superior North CFDC will treat all financial information and records as sensitive information. Implied consent is also granted by the individual to permit Superior North CFDC to report or otherwise disclose information to FedNor, the federal department that administers the Community Futures Program.

An individual can choose not to provide some or all of the personal information at any time, but if Superior North CFDC is unable to collect sufficient information to validate the request for financing, the individual's application for such financing may be declined.

A client or an individual can withdraw consent to Superior North CFDC's use of personal information at any time prior to the application being approved, by making such request in writing. Once a loan has been approved, an individual cannot withdraw consent authorizing Superior North CFDC to use and disclose the personal information for the purposes set out in this Privacy Policy.

In regards to the collection of personal information for business development and reporting to FedNor, a client or individual can withdraw consent to Superior North CFDC's use of personal information at any time by making such a request in writing. The client's information will be removed from the FedNor database and/or from the special project completed to meet annual Business Plan deliverables

Express consent will be obtained from the individual prior to disclosing the individual's personal information to other lenders, credit insurers and credit bureaus.

This Privacy Policy does not cover statistical data from which the identity of individuals cannot be determined. Superior North CFDC retains the right to use and disclose statistical data as it determines appropriate.

4.0 Limiting Collection

Personal information collected will be limited to the purposes set out in this Privacy Policy such as Superior North CFDC applications, and/or other forms. Superior North CFDC will never collect personal information indiscriminately and will endeavor to collect personal information by fair and lawful means, without misleading or deceiving the individual about the purposes for collection.

Under no circumstances will Superior North CFDC sell, distribute, or otherwise disclose personal information or contact lists to third parties. However, limited disclosure may be required as part of Superior North CFDC fulfilling its stated business duties and day-to-day operations. This may include consultants, suppliers, or business stakeholders of Superior North CFDC, but only with the understanding that these parties obey and abide by this Privacy Policy, to the extent necessary of fulfilling their own business duties and day-to-day operations.

5.0 Limiting Use, Disclosure and Retention

5.1 Use of Personal Information

Superior North CFDC will never use or disclose personal information for purposes other than those for which it was collected and the organization will document any new purpose for collecting personal information. Personal information will be used for only those purposes to which the individual has consented with the following exceptions, as permitted under PIPEDA.

Superior North CFDC will use personal information without the individual's consent, where:

- the organization has reasonable grounds to believe the information could be useful when investigating a contravention of a Federal, Provincial or foreign law and the information is used for that investigation;
- an emergency exists that threatens an individual's life, health or security;
- the information is for statistical study or research;
- the information is publicly available;
- the use is clearly in the individual's interest, and consent is not available in a timely way;
- knowledge and consent would compromise the availability or accuracy of the information, and;
- collection is required to investigate a breach of an agreement.

5.2 Disclosure and Transfer of Personal Information

Personal information will be disclosed to only those Superior North CFDC employees, members of Superior North CFDC committees, and the Board of Directors that need to know the information for the purposes of their work or making an assessment as to the individual's eligibility to the loan program.

Personal information will be disclosed to third parties with the individual's knowledge and consent.

Superior North CFDC human resource information is strictly confidential. Individual staff employee files are kept in a locked filing cabinet in the General Manager's office. Individual pay rates are only known to the Board of Directors for budget evaluation purposes; to the General Manager for performance appraisal purposes; and the Financial Coordinator for payroll purposes. All pay cheque information is distributed via email to each employee and the list containing employees' personal contact information is distributed only within the organization. Employee personal contact information is not shared publicly.

PIPEDA permits Superior North CFDC to disclose personal information to third parties, without an individual's knowledge and consent, to:

- a lawyer representing Superior North CFDC;
- collect a debt owed to Superior North CFDC by the individual or client;
- comply with a subpoena, a warrant or an order made by a court or other body with appropriate jurisdiction;
- a law enforcement agency in the process of a civil or criminal investigation;
- a government agency or department requesting the information; or,
- as required by law.

PIPEDA permits Superior North CFDC to transfer personal information to a third party, without the individual's knowledge or consent, if the transfer is simply for processing purposes and the third party only uses the information for the purposes for which it was transferred. Superior North CFDC will ensure, by contractual or other means that the third party protects the information and uses it only for the purposes for which it was transferred.

5.3 Retention of Personal Information

Personal information will be retained in client files as long as the file is active and for such periods of time as may be prescribed by applicable laws and regulations. Once personal information is no longer required, it will be destroyed in a safe and secure manner. However, certain laws may require that certain personal information be kept for a specified amount of time¹. Where this is the case, the law will supersede this policy.

When client information is destroyed, Superior North CFDC will employ a reputable document destruction firm. Secure document shredding services will be engaged and a clearance certificate will be held on file.

A client file will be deemed inactive if the Investment Committee rejects an application; when a loan is repaid in full and securities are discharged; when a guarantee is terminated; when a client closes their business or moves from the area; or upon a project completion. Information contained in an inactive file will be retained for a period of seven (7) years, except in the case where an application is rejected. Where an application has been rejected, the file and all personal information contained in the file will be retained for a period of two (2) years. Human resource information specific to staff and employees will be kept in perpetuity as per industry standards.

6.0 Accuracy

Superior North CFDC endeavours to ensure that any personal information provided by the individual in his or her active file(s) is accurate, current and complete as is necessary to fulfill the purposes for which the information has been collected, used, retained and disclosed. The Corporation will ensure that information is sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about the individual. Individuals are requested to notify Superior North CFDC of any change in personal or business information.

Information contained in inactive files is not updated.

7.0 Safeguards

Superior North CFDC will use physical, organizational, and technological measures to safeguard personal information to only those Superior North CFDC employees, volunteers, or third parties who need this information for the purposes that have been set out in this Privacy Policy. These measures will ensure that security safeguards will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. Employees will be trained on the importance of maintaining the confidentiality of personal information.

7.1 Organizational Safeguards

Access to personal information for Superior North CFDC commercial loans will be limited to the Financial Coordinator, Lending Coordinator and/or the General Manager who have to make a determination as to the individual's eligibility for a small business loan. Personal information provided to members of Superior North CFDC committee(s) will be limited to only that information required to carry out the mandate of that committee. Members of the Superior North CFDC committee(s) and/or Board of Directors are not permitted to copy or retain any personal information on individuals or clients and must return any documentation for destruction once the purpose for being provided with this information has been fulfilled.

Access to personal information gained from Superior North CFDC business counseling activity and economic development project activity will be limited to Business & CED Officers, Financial Coordinator, Lending Coordinator and the General Manager. This personal client information will be shared with funding agencies as outlined in annual agreements and for the purpose of reporting to FedNor.

Regarding client data stored in electronic databases, and in order to protect the fiduciary responsibilities of the Board of Directors, the Ontario Association of Community Futures Development Corporations (OACFDC) contracted the services of legal counsel and a legal privacy expert to review the various agreements between the OACFDC and its suppliers of information technology. The OACFDC was recommended to establish an agency relationship between OACFDC and each Northern Ontario CFDC as articulated in the Software Access Agreement. The agreement serves to assure that there are sufficient security, privacy and confidentiality measures in place to protect the CFDC client data currently stored in the hosted internet environment of The Exceptional Assistant (TEA) X software in use by Superior North CFDC. By the nature of the funding of the software acquisition, where the OACFDC holds the various contracts with suppliers but the user is Superior North CFDC, the execution of the agreement allows the OACFDC to pursue legal action in cooperation with and on behalf of the CFDC if there are any issues with the suppliers, Common Goals or Vision Quest Inc.

Employees and members of Superior North CFDC committee(s) and/or Board of Directors are required to sign a confidentiality agreement binding them to maintaining the confidentiality of all personal information to which they have access. A copy of the confidentiality agreement is included in this policy as Appendix 3.

7.2 Physical Safeguards

Active files are stored in locked filing cabinets when not in use. Active loan files are kept in fire-proof, locked filing cabinets within the Financial Coordinator's office. Access to work areas where active files may be in use is restricted to Superior North CFDC employees only and authorized third parties².

All inactive files or personal information no longer required are securely disposed of to prevent inadvertent disclosure to unauthorized persons. Third party contractors are utilized for the secure destruction of files, and these accredited contractors will provide Superior North CFDC with a valid security certificate.

The physical offices of Superior North CFDC are located at 7 Mill Road in Terrace Bay and the premises are secured. During work hours only authorized access to private offices is allowed. The reception area is monitored with video surveillance to ensure there is no unauthorized access. When staff is not in their respective offices, the offices are locked with access restricted to the General Manager. Outside of normal work hours, the building is locked with access restricted to employees and staff of Superior North CFDC.

7.2 a Video Surveillance

Superior North CFDC utilizes a video surveillance system at the main office located at 7 Mill Road, Terrace Bay, ON. The purpose of the video surveillance system is to help ensure the safety of staff, to promote public safety, and to identify any person accessing the main office in the absence of a formal reception staff. The video surveillance system is not used for covert surveillance. Digital video images are recorded for a 30 day period and are then over written by the video system. Personal information is recorded in 30 second time slots and recording is triggered by motion sensor. Written notice to the general public and staff who access the office is provided before entering the reception area and this notice has been provided in both official languages.

The Superior North CFDC Privacy Officer can answer any questions about the collection of video images, storage of these images and the intended use of these images.

7.3 Technological Safeguards

Superior North CFDC's computer and network systems are secured by complex passwords. Confidential client and personal information contained in Superior North CFDC computers and electronic data bases are password protected and only authorized individuals may access these secure systems. ³

Access to any of the Superior North CFDC's technology is password protected. For the purpose of this policy, Superior North CFDC technology is defined as any internet router, server, computer, back up device, mass storage device, facsimile machine or cell phone which is owned by Superior North CFDC. The internet router or server has firewall protection and intrusion detection systems sufficient to protect personal and confidential business information against virus attacks and "sniffer" software arising from Internet activity. Personal information that is transferred to volunteer committee members, the Board of Directors, or third parties by e-mail or other electronic form is sent utilizing a secure document and password protected system. All computers, back up devices, mass storage devices and cell phones are password protected.

7.4 Email Protection

Superior North CFDC understands that the privacy of every e-mail user should be respected and protected. To this end, there is an explicit policy for email which addresses the privacy of e-mail users contained in the Personnel Policy. Superior North CFDC has instructed all directors,

members and staff of this e-mail policy and has informed users of their rights and obligations in regard to the confidentiality of messages on the system.

Superior North CFDC e-mail systems are not used for the purpose of collecting, using and disclosing personal information, without adequate safeguards to protect privacy. All e-mail account users utilize password protection to protect e-mail programs utilized in the day-to-day operations.

7.5 Working outside the Office

Superior North CFDC has a privacy policy that will be followed by all staff when working outside of the office. This policy includes formal procedures for employees removing personal information while working offsite. These formal procedures are as follows:

- Laptops and cell phones will be stored in the trunk of their vehicle or stored out of plain site before the employee leaves the office and while the employee is not utilizing the equipment.
- Laptops and cell phones are password protected and will be shut down when not in use.
- There will be locks installed on all laptop carrying cases.
- Strict control of cell phones will be maintained at all times and employees will not discuss personal information while on their cell phone in public areas.
- All staff will take reasonable steps to safeguard computers, confidential files and/or papers while working offsite. All staff are aware of the importance of maintaining security and privacy of personal information. Paper records or files are only taken off-site when absolutely necessary and returned to a secure environment as quickly as possible. These steps include physical control of all computers, files, paperwork, including day timers and address books, while working offsite.
- All staff will control access to offsite areas such as ensuring that paperwork and files are not left un-attended while working offsite.

8.0 Openness

Superior North CFDC will make its privacy policies and procedures known to the individual via this Privacy Policy as well as the Superior North CFDC Privacy Statement. This document is attached as appendix 4 and will also be available on Superior North CFDC website: <http://snctdc.org>.

The General Manager is the person who is designated as Superior North CFDC Privacy Officer. The name, address and contact information of the General Manager is public knowledge and available on the website. Information on access to the information, a description of the types of personal information that is collected and held, a description of the types of personal information that is disclosed to third parties and instructions for complaints are clearly outlined in this Privacy Policy.

9.0 Individual Access

An Individual who wishes to review or verify what personal information is held by Superior North CFDC, or to whom the information has been disclosed (as permitted by the Act), may make the request for access, in writing, to the Superior North CFDC Privacy Officer.

Upon receiving a request in writing, Superior North CFDC will:

- inform individuals whether or not there is personal information held about them

- allow the individual access to this information
- provide an account on how the information has been or will be used
- inform individuals of third parties to which the information has been disclosed

Upon verification of the individual's identity, the Privacy Officer will respond within 30 days and provide the information in a format that is generally understandable and will retain the information that is the subject of a request for as long as necessary to allow the individual to exhaust any recourse under PIPEDA.

If the individual finds that the information held by Superior North CFDC is inaccurate or incomplete, upon the individual providing documentary evidence to verify the correct information, Superior North CFDC will promptly make the required changes to the individual's active file(s). Where appropriate, the amended information will also be transmitted to third parties having access to the information.

10.0 Complaints/Recourse

If an individual has a concern about Superior North CFDC's personal information handling practices, a complaint, in writing, may be directed to the Superior North CFDC Privacy Officer.

Upon verification of the individual's identity, Superior North CFDC's Privacy Officer will act promptly to investigate the complaint and provide a written report of the investigation's findings to the individual.

Where Superior North CFDC's Privacy Officer makes a determination that the individual's complaint is well founded; the Privacy Officer will take the necessary steps to correct the offending information, handling practice and/or revise Superior North CFDC's Privacy Policy.

Where Superior North CFDC's Privacy Officer determines that the individual's complaint is not well founded, the individual will be notified in writing.

If the individual is dissatisfied with the finding and corresponding action taken by Superior North CFDC's Privacy Officer, the individual may bring a complaint to the Federal Privacy Commissioner at the address below:

The Privacy Commissioner of Canada Email address: www.privcom.gc.ca.
112 Kent Street, Ottawa,
Ontario K1A 1H3
Tel 1-800-282-1376

10.1 Questions/Access Request/Complaint

Any questions regarding this or any other privacy policy of Superior North CFDC may be directed to the Chief Privacy Officer. Requests for access to information, or to make a complaint, are to be made in writing and sent to the Chief Privacy Officer at the address below:

General Manager - Privacy Officer
Superior North Community Futures Development Corporation
7 Mill Road, PO Box 716
Terrace Bay, ON P0T 2W0

11.0 Privacy Breach Protocol

A privacy breach occurs when personal information is collected, retained, used or disclosed in ways that are not in accordance with the provisions of the Freedom of Information and Protection of Privacy Act. Among the most common breaches of personal privacy is the unauthorized disclosure of personal information, contrary to section 42 of the provincial Act. If an individual believes that his or her privacy has been compromised as a result of failure to comply with one or more of the privacy protection provisions of the Act, then the individual can file a complaint with the Information and Privacy Commissioner of Ontario (IPC). The purpose of the IPC complaint investigation is future-orientated – that is, should it be established that there was a privacy breach; the IPC will make recommendations that assist Superior North CFDC in taking whatever remedial steps are necessary to prevent future similar occurrences.

Superior North CFDC will educate staff about: the privacy rules governing the collection, retention, use and disclosure of personal information set out in Part III of the provincial Act; educate staff about the regulations under the Act governing the safe and secure disposal of personal information; and ensure the Privacy Policy is in place and reviewed regularly. These steps will be taken to avoid a privacy breach.

Upon learning of a privacy breach, Superior North CFDC will take immediate action, with the first two priorities being containment and notification.

Superior North CFDC will take the following steps to identify the scope of the potential breach and to contain it:

1. Hard copies of any personal information that has been disclosed will be retrieved
2. The individual who was not authorized to receive the information will be contacted to ensure that no copies of the personal information have been made or retained
3. The Privacy Officer will determine whether the privacy breach would allow unauthorized access to any other personal information and take necessary steps that are appropriate to protect all information

Superior North CFDC will take the following steps to identify those individuals whose privacy was breached and barring exceptional circumstances, notify those individuals accordingly:

1. The Privacy Officer will notify the individuals whose privacy was breached by telephone or in writing
2. The Privacy Officer will provide details of the extent of the breach and specifics of the personal information at issue
3. If financial information is involved, the Privacy Officer will include the following in the notice: *As a precautionary measure, we strongly suggest that you contact your bank, credit card company, and appropriate government departments to advise them of this breach. You should monitor and verify all bank accounts, credit card and other financial transaction statements for any suspicious activity.*
4. The Privacy Officer will advise the individual of the steps that have been taken to address the breach, both immediate and long-term
5. The Privacy Officer will contact the IPC to ensure that all obligations under the Act are fulfilled
6. The Privacy Officer will provide the individual with contact information for the Privacy Office who can provide any additional information and or assistance

The Privacy Officer for Superior North CFDC will also take the following steps:

1. Notify the Board of Directors of the privacy breach and any immediate steps taken
2. Conduct a formal privacy breach inquiry with the staff member involved

3. Conduct an internal investigation into the matter to: 1) ensure the immediate requirements of containment and notification have been addressed; 2) review the circumstances surrounding the breach and report to Board; and 3) review the adequacy of existing policies and procedures in protecting personal information
4. Advise the IPC of review findings and work together to make any necessary changes

12.0 Amendment to Superior North Community Futures Development Corporation's Privacy Policies

The original Superior North Community Futures Development Corporation's Privacy Policy was in effect September 28, 2006. The policy is reviewed every two years and is subject to amendment in response to developments in the privacy legislation. The Privacy Officer will review and revise the Privacy Policy from time to time as required by changes in privacy law.

Notification of any changes in the Privacy Policy will be posted on Superior North CFDC's website, as well as in Superior North Community Futures Development Corporation's Privacy Statement. Any changes in the Privacy Policy will apply to Personal information collected from the date of the posting of the revised Privacy Policy on Superior North CFDC's website: <http://snctdc.org>.

13.0 References

The following represents a list of references contained within this Privacy Policy:

- 1 Superior North CFDC Record & Retention Policy
- 2 Superior North CFDC Workplace Anti-Violence and Harassment Policy
- 3 Superior North CFDC Personnel Policy

14.0 Appendices

The following represents a list of the attached items in the appendices:

1. Member Consent to Release Information
2. Staff Consent to Release Information
3. Confidentiality Agreement for Employees and volunteers
4. Privacy Statement



Superior North CFDC
SADC Supérieur Nord

Member Consent to Release Information

I _____ hereby authorize Superior North CFDC to release the following personal information about me:

Information to be released may or may not include the following information:

- My name
- My position within Superior North CFDC organization
- A digital picture of me as authorized by me

This information may be released in the following manner:

- Posted on the Superior North CFDC website
- Brochures and other information packages created for Superior North CFDC
- In newspaper articles

Note: My personal address and phone number are only disclosed on the internal Intranet site which is in the sole ownership of Superior North CFDC.

Note: This waiver is in effect for the term of my membership or until a change is requested.

Signature: _____

Date: _____

The personal information collected will be used for the purpose of processing your request to share your personal information as instructed above. It is collected under the Personal Information Protection and Electronic Documents Act (PIPEDA) and will be protected under its provisions. If you have any questions about the collection and use of this information, contact the Privacy Officer.

Appendix 2



Superior North CFDC
SADC Supérieur Nord

Staff Consent to Release Information

I _____ hereby authorize Superior North CFDC to release the following personal information about me:

Information to be released may or may not include the following information:

- My name
- My position within Superior North CFDC
- A digital picture of me as authorized by me

This information may be released in the following manner:

- Posted on the Superior North CFDC website
- Brochures and other information packages created for Superior North CFDC
- In newspaper articles

Note: My personal address and phone number are only disclosed on the internal Intranet site which is in the sole ownership of Superior North CFDC.

Note: This waiver is in effect for one year from the date of the request.

Signature: _____

Date: _____

The personal information collected will be used for the purpose of processing your request to share your personal information as instructed above. It is collected under the Personal Information Protection and Electronic Documents Act (PIPEDA) and will be protected under its provisions. If you have any questions about the collection and use of this information, contact the Privacy Officer.



Superior North CFDC
SADC Supérieur Nord

**CONFIDENTIALITY AGREEMENT
FOR EMPLOYEES AND VOLUNTEERS**

To: Superior North Community Futures Development Corporation

I, _____, the undersigned understand the significance and necessity of confidentiality of personal and business information arising from the business affairs and activities of Superior North CFDC. I, therefore, covenant and agree to keep any information received in the course of my duties, office, role or capacity with Superior North CFDC strictly confidential.

I confirm receipt of the Privacy Policy for Superior North CFDC and pledge that I will comply with the said Privacy Policy respecting any and all information received or learned by me about all bodies, businesses, individuals and subjects during the course of my duties, office, role or capacity with Superior North CFDC.

I also confirm receipt of Superior North CFDC Superior North CFDC *Retention and Destruction Policy* and will handle, retain and dispose of personal and business information in electronic and hard copy formats in accordance with these policies.

I further covenant and agree to take all steps necessary to preserve the confidential nature of personal and business information learned or received by me in the course of my duties, office, role or capacity with Superior North CFDC in accordance with the aforementioned privacy policies in the event that I leave this position with Superior North CFDC.

I understand that a breach of this confidentiality agreement will be brought to the attention of the Board of Directors and I may be subject to discretionary disciplinary action and possible termination of employment or suspension of volunteer appointment on the Superior North CFDC committee and/or Board of Directors.

Signature

Print Name

Witness

Date



Superior North CFDC
SADC Supérieur Nord

Privacy Statement

INTRODUCTION

Superior North Community Futures Development Corporation is a federally supported not-for-profit community organization with a volunteer Board of Directors and professional staff whose purpose is to support community economic development and small business growth through business loans or loan guarantees.

This information summarizes Superior North Community Futures Development Corporation's privacy policies and procedures that have been developed to comply with Canada's *Personal Information Protection and Electronic Documents Act* ("*PIPEDA*"). *PIPEDA* sets out rules for the collection, use and disclosure of a client's or customer's personal information, as well as safeguarding that information in the course of commercial activity as defined in the legislation.

WHAT IS "PERSONAL INFORMATION"

Under *PIPEDA*, "Personal Information" means any information that is identifiable to an individual, including name, address, 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.

PURPOSES FOR PERSONAL INFORMATION

Superior North Community Futures Development Corporation (Superior North CFDC) collects only that personal information required to assess a prospective applicant's eligibility for financial assistance, to provide business counseling assistance to our clients, and as well as to report to FedNor, the federal department that administers the Ontario Community Futures Program.

CONSENT

At the time of completing a loan application, the express, written consent of the individual applicant will be sought for the collection, use, retention and disclosure of their personal information for the purposes set out in Superior North CFDC's privacy policy.

An applicant may choose not to provide some or all of the personal information requested, but if Superior North CFDC is unable to collect sufficient information to validate a financing request, the application for financing may be turned down.

ACCURACY

Superior North CFDC endeavors to ensure that all personal information in active files is accurate, current and complete. When a client notifies Superior North CFDC that his or her personal information requires correction or updating, the necessary changes will be made. Information contained in closed files is not updated.

LIMITING USE, RETENTION & DISCLOSURE

Superior North CFDC uses and retains personal information for only those purposes to which the individual has consented.

Personal information will be disclosed to only those Superior North CFDC employees, volunteer members of committees and/or Board of Directors that need to know the information for the purposes set out in the Superior North CFDC Privacy Policy.

SAFEGUARDS

Superior North CFDC utilizes a number of physical, organizational and technological measures to safeguard personal information from unauthorized access or inadvertent disclosure in accordance with its *Retention and Destruction Policy*, including but not limited to:

Physical

Active files are stored in locked filing cabinets located in work areas restricted to Superior North CFDC employees and authorized volunteers. Closed files are stored in locked cabinets for a period of seven years, after which, the information is shredded and disposed.

Organizational

Superior North CFDC 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 Superior North CFDC computers and the electronic databases are password protected. As well, 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 Superior North CFDC, all Internet transmissions are susceptible to possible loss, misrouting, interception and misuse. For this reason, as part of the application that individual's sign consenting to their personal information being collected used, retained, and disclosed, Superior North CFDC will assume that it has the individual's consent to communicate via the Internet unless notified to the contrary.

INDIVIDUAL ACCESS

An individual who wishes to review or verify what personal information is held by Superior North CFDC, may do so by making a request, in writing to the Superior North CFDC's Privacy Officer. Upon verification of the individual's identity, the Privacy Office will provide a written report within 30 days.

INVESTIGATING COMPLAINTS

Any concern or issue about Superior North CFDC's personal information handling practices may be made, in writing, to the 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 Superior North CFDC is insufficient, the individual may direct a complaint to the Federal Privacy Commissioner in writing. The address of the Federal Privacy Commissioner is provided in this Privacy Statement for your convenience.

AMENDMENTS TO OUR PRIVACY POLICY

This Privacy Statement is a summary of Superior North CFDC's Privacy Policy. For full particulars of Superior North CFDC's privacy policies and procedures, please request a copy of the Privacy Policy from Superior North Community Futures Development Corporation or a copy may be obtained from the Internet website at: <http://sncfdc.org>.

Superior North CFDC's Privacy Policy and this Privacy Statement may be updated from time to time to reflect amendments in applicable Federal and Provincial laws. Any changes to this Privacy Policy will be posted on Superior North CFDC website and will apply to personal information collected from the date of the posting of the revised Privacy Policy.

CONTACT INFORMATION

If you have any questions regarding Superior North Community Futures Development Corporation's Privacy Policy, Retention and Destruction Policy, and/or this Privacy Statement, or you wish to make an access to personal information request, please contact:

Privacy Officer
Superior North Community Futures Development Corporation
7 Mill Road
Terrace Bay, Ontario
P0T 2W0
Phone: (807) 825-4505