

GN Policies and Procedures

Policy Section: General

Subsection: Private Information and Advertising

Topic: Privacy and Advertising

Status: Approved by Board

Date: 1 June 2021

Policy Statement

1. GN is committed to respecting the privacy of its members, staff, volunteers and the general public when collecting, storing and distributing information and advertising its services and products.
2. As a non-profit charitable organization, GN is subject to the *Personal Information Privacy Act (PIPA)* for private information and *Canada's Anti-Spam Legislation (CASL)* for advertising.
3. Private information includes but is not limited to
 1. Name
 2. Telephone number
 3. Physical address
 4. Email address
 5. Photos
 6. Social insurance number
 7. Date of birth
 8. Provincial health card number
 9. Driver's licence number
 10. Work application resumes
 11. Medical information
 12. Credit card and banking information.
4. GN shall only collect personal information that is necessary to supply its products and services or required by government laws or regulations.
5. Collected private information shall be safely stored. It shall be deleted when it is no longer needed to continue its services unless it must be retained to comply with government laws or regulations.
6. No private information for an individual shall be made available to the public or a third party without the written consent from the individual or legal guardian in the case of a child.
7. Advertising includes electronic messages for commercial purpose and shall only be sent with the recipient's prior consent.

Procedures

1. Private Information Collection and Storage

1.1 The Board shall maintain a central list of collected private information outlining the

1. Type of information
2. Reason for its collection
3. Storage location (including computer backups).

1.2. The GN Membership Form shall contain a section allowing applicants to specify the type of information they consent to be released to the public. Any member not filling out this section of the form shall be assumed not to have provided consent. This remains the case even if consent was provided on a form for a previous year.

1.3. Private information not consented to or included in the Membership Form shall require specific consent on an appropriate form.

1.4. Private information from staff and volunteers can be collected without consent provided that the person is informed of the collection and the reasons for its need. In this case, appropriate measures for the storage and removal of the information shall still follow the requirements outlined below.

1.5. Explicit consent of private information is not required if the consent is implied due to the nature of a transaction. For example, this is the case when a credit or debit card is used. The processing of such transactions shall be done such that the full card number is not displayed or stored on GN computers or other electronic device, or printed on receipts.

1.6. When holding public events, GN shall

1. Inform the public, using signs, if photos will be taken by GN or journalists.
2. Request permission from any person (or legal guardian) of a photo taken by GN where the person, or child, is identifiable. The consent shall first be done verbally and then in writing if the photo is to be published by GN or third party, such as local media.

1.7. Private information shall be stored in a safe location with special measures used for very sensitive information such as date of births, social security numbers, driver's licence number, provincial health card number, medical records, credit card and banking information. For such sensitive information, hardcopies shall be stored in a locked cabinet and digital copies shall be encrypted with password protection.

1.8. Mass mail-outs of emails to members shall be done using blind copies (Bcc) to recipients so that they cannot see each other's email address.

2. Advertising

2.1 Written consent shall be obtained by potential recipients before sending any email promoting commercial products and services. These do not include emails sent to GN members related to products and services that are part of the membership. For members, this consent shall be made possible in a section of the Membership Form. Any member not filling out this section of the form shall be assumed not to have provided consent. This remains the case even if consent was provided on a form for a previous year.

2.2 GN shall not send, without prior consent, any emails promoting services and products offered by third parties including vendors and other organizations.

3. Communication Vehicles

3.1 All text and photos published in GN communication vehicles, including the Chronicle, GN websites and Facebook pages, shall abide by the clauses in this Policy and Procedure.

3.2 A privacy Statement shall be included in the footer sections of GN websites.

4. Removal of Private Information

4.1 Personal information shall be permanently deleted within one year after it is no longer needed by GN to perform its services unless it must be retained to comply with government laws and regulations. This includes information stored on computers, external hard disks, thumb drives or using external 'cloud' storage services. Hardcopies shall be shredded using a cross-shredder, or with an equivalent or higher security shredder. Digital copies of sensitive information shall be electronically shredded using the appropriate software.

4.2 A list of deleted information shall be maintained.

5. Response to Personal Information Access Requests

5.1 Individuals have the right to request the personal information that GN has collected about them. After appropriate identity verification, this information shall be provided in a secure manner within 45 days of the request.

6. Privacy Representative and Contact

6.1 The Board shall assign one of its members the duties to act as GN's Privacy Representative and Contact (PRC).

6.2 The PRC's responsibilities shall include:

- Staying informed on PIPA and CASL requirements. This includes reading the Alberta document '[Protecting Personal Information, A Workbook for Non-Profit Organizations](#)'.
- Maintaining the central list of private information collected by the Board and Committees.
- Maintain a list and storage of consents given to GN for the release of private information.
- Interact with and guide Board Members and Committee Chairs in matters related to privacy.
- Respond to internal and external inquiries and concerns or access requests related to GN privacy and advertising.

6.3 The PRC's contact information shall be given to all Board Members, Committee Chairs and Staff and included in the Privacy Statement in the footer section of GN websites.