



Professional Engineers
Ontario

PEO Privacy Policy

November 20, 2015

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PEO Privacy Policy (Unabridged)
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Introduction

Professional Engineers Ontario (PEO) regulates the practice of professional engineering in the public interest under the *Professional Engineers Act*. Its public interest regulatory mandate is set out in section 2 of the *Professional Engineers Act*. More information about PEO and its governing legislation can be found on PEO's website at www.peo.on.ca.

PEO is committed to maintaining the accuracy, confidentiality, security and privacy of an individual's personal information. This is reflected in existing privacy and confidentiality provisions found in various PEO policies and practices. It is also reflected in the high regard and trust with which individuals view the management of personal information by PEO. Under section 38 of the *Professional Engineers Act* PEO is legally obliged to keep all of its information confidential unless the regulatory mandate of PEO requires disclosure.

PEO's Privacy Policy is a statement of the principles and guidelines for the minimum required protection of personal information collected, used or disclosed by PEO. The objective of PEO's Privacy Policy is responsible and transparent practices in the management of personal information, in accordance with contemporary privacy expectations. PEO's Privacy Policy also provides guidance as to how it interprets its ability to disclose information "as may be required in connection with the administration" of the legislation as set out in section 38 of the *Professional Engineers Act*.

PEO does not engage in commercial activities. Thus it is not covered by the provisions of Part 1 of the *Personal Information Protection and Electronic Documents Act*. However, PEO has chosen to follow the 10 principles of the Canadian Standards Association (CSA) Model Code for the Protection of Personal Information with necessary modifications to reflect that it is a regulatory body that has to sometimes collect, use and disclose personal information without consent in order to serve and protect the public interest.

Personal information about PEO staff is not covered by this Privacy Policy. While PEO does treat personal information about its staff with an appropriate degree of sensitivity and respect, that information is governed by different considerations than the type of personal information described below.

Definitions

Practitioner-means a holder from PEO of a licence, a temporary licence, a limited licence, a provisional licence, a certificate of authorization, a consulting engineer designation, engineer in training, student, or similar person.

Professional Engineers Act-means the *Professional Engineers Act*, R.S.O. 1990, Chapter P-28 as amended and includes the regulations and by-laws made under it unless the context indicates otherwise. The term may also include, in some contexts, other legislation imposing regulatory duties on PEO.

Chief Privacy Officer—means the person designated as the Chief Privacy Officer under this Privacy Policy and any delegate acting on his or her behalf.

Collection—means the act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

Consent—means voluntary agreement for the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual, by his or her legal guardian or by a person having power of attorney for the individual. Express consent can be given orally, electronically or in writing, but is always unequivocal and does not require any inference on the part of PEO. Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

Disclosure—means making personal information available to a third party.

PEO—means the Association of Professional Engineers of Ontario, as defined by ss. 2(1) of the *Professional Engineers Act*, as well as Council, Councillors, members, employees, volunteers and agents acting on behalf of PEO.

Personal information—means information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization.

Privacy Review Councillor—means the Complaints Review Councillor appointed under s. 25 of the *Professional Engineers Act* who is given the additional responsibility of reviewing the treatment of access and correction requests and privacy complaints made to the Chief Privacy Officer in the same way he or she would review treatment of complaints under the *Professional Engineers Act*.

Third party—means an individual other than the subject individual or his or her respective agent, or an organization other than PEO and its agents.

Use—means the treatment, handling, and management of personal information by and within PEO.

PEO Privacy Policy Principles

Principle 1 - Accountability

PEO is responsible for personal information under its control and designates at least one person to be accountable for its compliance with the principles outlined in this Privacy Policy.

Responsibility for ensuring compliance with the provisions of PEO's Privacy Policy rests with the senior management of PEO, which designates at least one person to be

accountable for compliance with the Policy. Other individuals within PEO may be delegated to act on behalf of the designated person(s) or to take responsibility for the day-to-day collection, use and disclosure of personal information.

PEO has designated a Chief Privacy Officer to oversee compliance with PEO's Privacy Policy. The Chief Privacy Officer can be contacted at:

Chief Privacy Officer
101-40 Sheppard Avenue West
Toronto, ON M2N 6K9
email: privacy@peo.on.ca
telephone: (416) 224-1100 or (800) 339-3716
fax: (416) 224-8168 or (800) 268-0496

Principle 2 - Identifying Purposes for Collection of Personal Information

PEO collects personal information for the purpose of administering and enforcing the *Professional Engineers Act*. In addition PEO may, in a few circumstances, have obligations under other Acts for which it collects personal information. The principle types of personal information collected and the primary purposes for PEO collecting that personal information are as follows.

About Applicants

PEO collects personal information about students, applicants for a licence / reinstatement, temporary licence, limited licence, provisional licence, certificate of authorization, consulting engineering designation, and similar persons. It collects this information in order to assess whether the applicants meet the requirements for the licence, etc. and to hear appeals, to communicate with them, to process their payments, to obtain baseline information for subsequent regulatory activities (e.g., demographic profile and human resources planning for the profession), to confirm attendance at the P.Eng. Licence certificate presentation ceremonies and to grant examination awards and related purposes. Examples of the type of information collected for these purposes include: name, contact information, gender, academic qualifications, examination achievements, experience obtained, references, good character and past conduct, liability insurance coverage, immigration status, date of birth and banking or credit card information.

About Practitioners

PEO collects personal information about practitioners for a number of regulatory purposes including to communicate with them, to maintain current registers and directories, to renew licences and similar statutes, to investigate allegations or complaints of professional misconduct or incompetence, to investigate unlawful practice of engineering or unlawful holding out as an engineer by an unlicensed person, to investigate complaints about PEO operations, to ascertain liability insurance status, to provide documentation, certificates, seals, signs and educational materials, to process

payments / donations, to process resignations, to recruit volunteers, to operate the awards program and to consult with the profession. Examples of the type of information collected for these purposes include: name, contact information, age, conduct and practice information, liability insurance status, views and opinions, educational, professional or personal achievements and banking or credit card information.

About Volunteers

PEO prides itself on the number of volunteers, primarily engineers, who assist it in carrying out its regulatory mandate. Volunteers serve on Council, committees, task forces / task groups and in local Chapters (see the discussion about local Chapters below). To support the volunteer structure, PEO collects personal information for the following purposes:

- to communicate with volunteers
- for recruitment and assessment of their suitability to serve
- to conduct elections
- to accommodate their preferences (e.g., where they would like to serve, dietary requirements)
- to avoid conflicts of interest
- for recognition of service
- to record their opinions, votes and decisions
- to produce PEO publications
- to make travel arrangements and to reimburse their expenses.

Examples of the type of information collected for these purposes include: names, contact information, qualifications and willingness of potential volunteers, preferences, performance, travel arrangements, expenses, photographs, achievements and opinions and views of volunteers.

About Members of the Public

PEO has contact with members of the public in a variety of contexts, which involves collecting personal information about them. Examples of some of the variety of purposes and personal information collected include the following:

- to provide information about PEO and engineers requested by a member of the public (e.g., subscription to PEO's publication, Engineering Dimensions)
- to obtain references and views about applicants to PEO (e.g., their good character) or existing practitioners of PEO (e.g., about an allegation or complaint)
- to investigate the unlawful practice of engineering or the unlawful holding out as an engineer by an unlicensed person
- to facilitate attendance at a public meeting at PEO (e.g., Council meeting, discipline hearing)
- to obtain opinions and views about engineering and regulatory issues
- to advocate effectively with government and other organizations

- to identify and recruit lay volunteers
- for engineering competitions and community events (e.g., science fair prizes) and other awards or nomination for prestigious appointments
- to select consultants and service providers for PEO and
- for security and accommodation planning purposes (e.g., sign-in sheets).

Electronic Collection of Personal Information

PEO has the usual electronic equipment for an organization of its nature and size. The use of this equipment results in the routine collection of personal information. PEO strives to ensure that this collection is reasonable and obvious. Most of the collection is known by the individual at the time of collection (e.g., voice mail systems, emails sent to PEO, court reporters at hearings, website forms filled out by visitors). Other forms of electronic collection are made known at the time (e.g., people are advised if the meeting room cameras are in use for recording or an audio tape is made of a meeting, and PEO's electronic cookies policy is posted on its website). Other forms of electronic collection are made known in this Privacy Policy or upon request and are likely assumed by most individuals having contact with PEO (e.g., PEO has call display on some telephones, an automatic attendant at the switchboard, security cards given to staff and some volunteers and consultants record their use, PEO's long distance service provider details long distance calls made by PEO, PEO cell phones may have automatic records of call details).

The purposes of this electronic collection of information include: ensuring the security of PEO's premises and information, assisting in the efficiency of PEO's staff, accurate recording of important information and facilitating navigation and the appropriate use of PEO's website.

PEO strives to use its electronic equipment in a manner that would be generally accepted as being appropriate and reasonable. Anyone having questions or concerns about PEO's electronic collection of information should contact PEO's Chief Privacy Officer for clarification.

PEO's Local Chapters

PEO has 38 local Chapters of practitioners. The local Chapters are critical in helping PEO to achieve its mandate at the local level. They engage in activities that welcome new practitioners, educate practitioners and reach out into the community. Because local Chapters are fairly autonomous in their operations, a separate Privacy Policy for them has been developed. Copies can be obtained from PEO's website or PEO's Chief Privacy Officer.

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PEO does not collect personal information for commercial purposes.

Where possible, PEO will make a reasonable effort to advise individuals from whom personal information is collected of the primary purpose for collection unless to do so would interfere with the regulatory purpose. PEO strives to do this at the time of collection or as soon after that time as possible. PEO tries to state the purpose in reasonably understandable language.

Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information

As noted above, PEO collects personal information for purposes related to the proper administration and enforcement of the *Professional Engineers Act* and for other related regulatory purposes.

Obtaining consent of the individuals would, in many cases, defeat the purposes of PEO's collecting, using and disclosing the personal information. Personal information will only be collected, used and disclosed without the knowledge and consent of the individual for the purpose of the administration and enforcement of the *Professional Engineers Act* and related legislation and in accordance with any applicable provisions of the legislation. For example, PEO has an obligation to verify applications for licences, etc., regardless as to whether the applicant consents or not. Similarly, when PEO investigates allegations or complaints it often cannot obtain consent. Sometimes PEO cannot even state the purpose for collection without jeopardizing the investigation or disclosing inappropriate information about the practitioner.

PEO may also use or disclose personal information without knowledge and consent in the case of an emergency where the life, health or security of an individual is threatened. PEO may also disclose personal information without knowledge and consent to a lawyer representing PEO, to collect a debt, to comply with a subpoena, warrant or other court order or as may be otherwise required or authorized by law.

However, in many other contexts, PEO is able to obtain consent prior to the collection, use or disclosure of personal information. For example, PEO generally does not collect personal information from an applicant, other than possibly contact information, until the applicant has submitted the application form. Practitioners have a choice before completing member interest surveys. Volunteers can choose not to provide personal details to their staff support persons or to be the subject of a "profile" article in the publication *Engineering Dimensions*.

In obtaining consent, PEO uses reasonable efforts to ensure that an individual is advised of the identified purposes for which personal information will be used or disclosed. Purposes will be stated in a manner that can be reasonably understood by the individual.

Generally, PEO seeks consent to use and disclose personal information at the same time it collects the information. However, PEO may seek consent to use and disclose personal information after it has been collected, but before it is used or disclosed for a new purpose.

PEO will not, as a condition of licensure, the supply of a product or service, require individuals to consent to the collection, use or disclosure of personal information beyond that required to fulfill PEO's regulatory mandate.

In determining the appropriate form of consent, PEO takes into account the sensitivity of the personal information and the reasonable expectations of individuals. For example, PEO believes that potential volunteers and awards recipients would agree to being considered without express consent. Similarly, PEO believes that express consent is not required for taking or publishing pictures of adults attending public PEO and local Chapter functions and events. However detailed descriptions of volunteers on PEO's website or in the Association Operations Directory or annual report normally will occur after consent has first been obtained.

PEO also does not obtain consent from members of the public prior to considering them for awards or for nomination for prestigious appointments.

An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice unless a valid regulatory purpose would be compromised. Individuals may contact PEO for more information regarding the implications of withdrawing consent.

Principle 4 - Limiting Collection of Personal Information

PEO limits the collection of personal information to what is necessary for its identified purposes. PEO collects personal information by fair and lawful means.

PEO tries to collect personal information directly from individuals unless there is a regulatory reason to collect the personal information from others.

Principle 5 - Limiting Use, Disclosure, and Retention of Personal Information

PEO does not use or disclose personal information for purposes other than those for which it was collected, except to fulfill its regulatory mandate, with the consent of the individual, or as permitted or required by law.

Part of PEO's regulatory mandate is to make available to the public certain information about its practitioners. PEO therefore maintains registers and directories of such information. PEO is constantly exploring additional means of making such information reasonably accessible to the public. In 2006 PEO, implemented a model of public access to information about practitioners that will enable members of the public (including clients and employers) to choose, contact and hold accountable practitioners for their professional conduct and services. The most significant information is available from the PEO website or by telephone and in writing. More sensitive information has to be requested in writing, identifying the requester and stating an acceptable reason for the request.

Exceptions to public access to even this information (including information on the PEO website in rare circumstances) are permitted in appropriate circumstances.

PEO is also required to maintain a high degree of transparency of its regulatory processes. For example, its Council and Executive Committee meetings are open to the public. Discipline hearings are also public. Personal information will sometimes be disclosed in the course of maintaining this transparency.

PEO retains personal information only as long as is necessary to fulfill its purposes and has a records retention policy to facilitate this goal. Depending on the circumstances, where personal information has been used to make a decision about an individual, PEO retains, for a period of time that is reasonably sufficient to allow for access by the individual, either the actual information or the rationale for making the decision. PEO monitors the retention practices of its staff and volunteers.

PEO shares relevant applicant / practitioner information with other regulators without obtaining consent as this activity is in the public interest and fosters a reciprocal sharing of information with PEO. For example, sharing of information with other professional engineering regulators for the purpose of discipline and enforcement is governed by the Memorandum of Understanding on Discipline and Enforcement for Associations / Ordre of Professional Engineers in Canada. Similarly, sharing of information with other professional engineering regulators for the purpose of licensing or registration is governed by the Agreement on Mobility of Professional Engineers within Canada.

PEO does not disclose applicant or licence holder personal information to third parties for commercial purposes and will not do so without obtaining the express written consent of the licence holder or EIT. Except for reasons indicated in the foregoing paragraph, PEO will not provide bulk data transfers to a third party for non-regulatory purposes.

PEO discloses information concerning the death of a member to protect the public by assisting those who may have dealt with him or her professionally in the past, who are looking to work with the deceased member, to prevent others from misrepresenting themselves in respect of the deceased member and to recognize and honour the deceased member's contribution to the profession.

Principle 6 - Accuracy of Personal Information

It is in the best interest of the public that PEO collect, use and disclose accurate personal information in regulating the profession. PEO therefore exerts its best effort to ensure that information collected, used and disclosed is accurate. However, in order to be accountable for its collection, use and disclosure of information, PEO sometimes makes corrections to information without obliterating the original entry.

PEO updates personal information about individuals as and when necessary to fulfill its regulatory purposes or upon notification by the individual. PEO requires practitioners to routinely update their personal information.

Principle 7 - Safeguards

PEO protects personal information through the use of security safeguards appropriate to the sensitivity of the information. These safeguards include physical measures (e.g., locked cabinets and offices, use of security personnel), technological measures (e.g., password protection for computers, security cameras) and organizational measures (e.g., a need-to-know policy for staff and volunteers' access to personal information). PEO protects the information regardless of the format in which it is held.

PEO protects personal information transferred to its agents, consultants and service providers (e.g., PEO's lawyers, accountants, IT consultants, external storage services) by obtaining appropriate privacy assurances stipulating or confirming the safeguarding of the information and restricting the purposes for which it is to be used in all contractual agreements.

Detailed staff and volunteer policies are in writing and are monitored by PEO's Chief Privacy Officer.

Principle 8 - Openness Concerning Privacy Policies and Practices

PEO's Privacy Policy and subordinate policies are available upon request. Staff are trained to respond positively to any such request. PEO's more significant Privacy Policies are available on its website and in printed form at its office.

Principle 9 - Access to Personal Information

Where PEO holds personal information about an individual, upon written request, PEO shall allow access to the information to that individual, unless providing access could reasonably be expected to interfere with the administration or enforcement of the *Professional Engineers Act* or it is impracticable or impossible for PEO to retrieve the information.

PEO shall correct or complete any personal information found to be inaccurate or incomplete without obliterating the original entry, unless to do so would interfere with the administration or enforcement of the *Professional Engineers Act* or the information relates to observations made or opinions reached by PEO staff, volunteers or agents. Any unresolved differences are noted in the individual's file. Unless inappropriate to do so, PEO transmits to third parties who have had access to the personal information in the past twelve months any corrected information or the existence of any unresolved differences.

Individuals may obtain their personal information or seek access to their individual files by contacting PEO's Chief Privacy Officer. If the individual is not satisfied with the Chief Privacy Officer's response to their request for access and / or correction, he or she may have the decision reviewed by the Privacy Review Councillor in accordance with

Principle 10. A detailed written procedure on how to make a request for access and / or correction is available from the Chief Privacy Officer upon request.

Principle 10 - Challenging Compliance

Questions or concerns about PEO's compliance with this Privacy Policy should be directed to the Chief Privacy Officer who can be reached at:

Chief Privacy Officer
101-40 Sheppard Avenue West
Toronto, ON, M2N 6K9
email: privacy@peo.on.ca
telephone: (416) 224-1100 or (800) 339-3716
fax: (416) 224-8168 or (800) 268-0496

The Chief Privacy Officer will assign the appropriate PEO staff person to try to resolve the question or concern.

If PEO cannot satisfactorily resolve a question or concern, PEO has a formal privacy complaints procedure which includes:

- acknowledgement of the complaint;
- investigation of the complaint by PEO's Chief Privacy Officer or his or her delegate;
- providing a written decision and reasons for decision to the complainant;
- taking appropriate measures where the complaint is substantiated; and
- a process for the independent review of the treatment of the complaint by the Privacy Review Councillor.

A detailed written description of the complaints procedure is available from the Chief Privacy Officer upon request.

Please note that there is a different process for handling complaints about the conduct or actions of a practitioner. Please contact PEO's Registrar if you wish to file a complaint about the conduct or actions of a practitioner.

Principle 11 - Notification of Members

PEO shall take the necessary steps to notify members in a timely manner should their private information in the register be accessed or compromised through unauthorized and unlawful means.

Privacy Sub-Policy No. 1

Local Chapters Privacy Policy

Introduction

PEO's Chapters are a part of PEO. They are not separate legal entities. They further the mandate of PEO. Their mandate, objectives and essential purpose are as follows:

Mandate

PEO Chapters are the local presence for Professional Engineers Ontario and are tasked with the responsibilities of assisting PEO in meeting the objectives of the PEO organization.

Objectives

Through local presence and activities, PEO Chapters:

- Facilitate participation and training of licence holders in the governance, succession planning for PEO leadership, and statutory duties of the profession;
- Work to identify the value of the profession to future licence holders;
- Promote and enhance the understanding within society of the self regulated engineering profession and the importance of licensure; and
- Actively participate in policy development of the PEO.

Essential Purpose

The essential purpose of Chapters is Policy and Communications through the following initiatives.

1. Enhance a local presence for the engineering profession throughout Ontario.
2. Provide an introduction and training for professional engineers who want to participate in the statutory functions of the profession.
3. Provide timely and current information to licence holders.
4. Provide an active communication link between the membership and Council with regards to:
 - a. PEO Policy Development;
 - b. Succession planning for PEO Leadership; and
 - c. PEO and Chapter Budget planning.
5. Provide a forum for the local discussion of professional and civic affairs.
6. Enhance the professional development, competency, and social responsibility of professional engineers.
7. Serve as an information resource for professional engineers, the public and society.

8. Promote public awareness of the engineering profession in the local community.
9. Provide a local point of contact for the community to access information on the profession and Engineering.
10. Promote participation of licence holders in Chapter activities and PEO committees.
11. Promote recognition of individuals or firms for their support of the profession.

The major activities of the Chapters are: licence presentation ceremonies, tours (many of which are educational in nature) and the holding of seminars and arranging for speakers. These activities would generally be operated on a cost recovery basis. Except for the public awareness activities of the Chapters, these activities are directed towards local practitioners and their families and friends.

Since the Chapters are part of PEO, the general PEO Privacy Policy applies to the local Chapters except for the specific modifications set out below. However, since Chapters are fairly autonomous in their structure and activities, they have distinct privacy challenges. Some of the unique features of the Privacy Policy for the Chapters are set out below.

Principle 1 - Accountability

The Secretary or the Executive of each local Chapter, or alternatively, any other Executive member of the local Chapter as selected by the Executive Committee of the Chapter, is the Chapter Privacy Officer. He or she is responsible for ensuring that PEO's Privacy Policies are applied to the personal information collected, used or disclosed by the Chapter.

The Senior Regional Councillors are the Regional Privacy Officers. They are responsible for ensuring the Chapter Privacy Officers understand and comply with their privacy obligations.

The Chapter Privacy Officer has the assistance of the Regional Privacy Officers. Both the Chapter Privacy Officer and the Regional Privacy Officers have the assistance of the Chief Privacy Officer of PEO.

The Chief Privacy Officer or his or her delegate reviews with each of the Regional Privacy Officers at least once a year the privacy responsibilities of the Chapters. The Chief Privacy Officer or his or her delegate and the Regional Privacy Officers will review at least twice a year (once shortly after selection and once at the end of the term) the privacy responsibilities of the Chapter Privacy Officer of each Chapter.

The Chief Privacy Officer can be reached at:

Chief Privacy Officer
101-40 Sheppard Avenue West

Toronto, ON, M2N 6K9
email: privacy@peo.on.ca
telephone: (416) 224-1100 or (800) 339-3716
fax: (416) 224-8168 or (800) 268-0496

Principle 2 - Identifying Purposes for Collection of Personal Information

The Chapter Privacy Officer shall ensure that the purpose of any collection of personal information is identified at the time of collection unless there is a good regulatory reason for not doing so. Ordinarily the purpose will be obvious (e.g., registration and payment for a dinner, tour or speech). However, where the purpose may not be obvious (e.g., collecting home contact information from a member of the public) the Chapter Privacy Officer will ensure that the purpose is identified and consent is obtained.

Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information

Generally consent is obtained for the collection, use and disclosure of personal information by Chapters. The consent may be implied where the purpose is obvious (e.g., sign up sheets for receipt of email notices of future events). However, where the purpose may not be obvious (e.g., collecting home contact information from a member of the public) the Chapter Privacy Officer will ensure that consent is obtained.

Express consent is not obtained for the collection of practitioners' contact information from PEO head office. However, if a practitioner wishes to be removed from a mailing list, the Chapter Privacy Officer will ensure that this is done and inform PEO head office. Similarly express consent is not obtained for the initial screening for awards or recruitment for volunteer positions. However, before any award is presented or selection made for a volunteer position, the individual is consulted and given an opportunity to decline.

Principle 4 - Limiting Collection of Personal Information

The Chapter Privacy Officer will ensure that the minimum collection of personal information to reasonably achieve the purpose is obtained.

Principle 5 - Limiting Use, Disclosure and Retention of Personal Information

The Chapter Privacy Officer will ensure that personal information is used, disclosed and retained only for the purpose for which it was collected, for similar related uses, disclosure and retention that reasonably flow from them, for regulatory uses for which consent is not reasonable and for new uses, disclosure or retention for which a separate consent has been obtained.

The Chapter Privacy Officer will go through the Chapter records once a year to securely destroy or return to PEO head office any personal information that is no longer necessary to keep for its purpose.

Principle 6 - Accuracy of Personal Information

The Chapter Privacy Officer will take reasonable steps to ensure that the personal information is accurate. This is generally simple since most of it is self-reported by the affected individual and is updated regularly if needed on an on-going basis by the individual.

Principle 7 - Safeguards

The Chapter Privacy Officer will take reasonable steps to safeguard the personal information held by the Chapter in a manner consistent with PEO's Privacy Sub-Policy on Privacy Safeguards. Generally the personal information will be kept under lock and key (e.g., locked cabinet) and once a year be pruned and the discarded information will either be shredded or couriered to the Chief Privacy Officer for shredding.

Personal information in electronic format will normally be stored on disk secured in a locked area at the Chapter Privacy Officer's home or office (e.g., locked cabinet) rather than on the hard drive of the Chapter Privacy Officer's work or home computer. The Chapter Privacy Officer will endeavour to encourage all Chapter Executive members to delete emails containing personal information immediately after use and generally keep any other electronic information on a disk stored with the Chapter Privacy Officer in a locked area after use.

Principle 8 - Openness Concerning Privacy Policies and Practices

PEO's general Privacy Policy and this Local Chapters Privacy Policy is available on PEO's website and in paper form upon request from the Chapter Privacy Officer, the Regional Privacy Officer or the Chief Privacy Officer.

Principle 9 - Access to Personal Information

The Chapter Privacy Officer, with the assistance of the Regional Privacy Officers, will handle simple requests for access to the personal information and any resulting correction requests locally in accordance with the principles of PEO's Privacy Policy. If the request raises any issues of concern (e.g., the personal information also relates to another individual, such as a reference relating to recruitment for a volunteer position), the Chapter Privacy Officer shall immediately refer the request to the Chief Privacy Officer and work with the Chief Privacy Officer, in conjunction with the Regional Privacy Officer, to process the request appropriately.

Principle 10 - Challenging Compliance

The Chapter Privacy Officer, with the assistance of the Regional Privacy Officers, will try to resolve any simple concerns expressed about the handling of personal information locally in accordance with the principles of PEO's Privacy Policy. However, if the concern is complex and not easily resolvable by the Chapter Privacy Officer's explanation to the individual, the Chapter Privacy Officer shall immediately refer the request to the Chief Privacy Officer and work with the Chief Privacy Officer, in conjunction with the Regional Privacy Officer, to process the concern appropriately.

Privacy Sub-Policy No. 2

PEO Internet Privacy Policy

We respect and are committed to protecting your privacy. That is why Professional Engineers Ontario has adopted this Privacy Policy. This Privacy Policy lets you know how your personal information is processed and used. We promise that we will take steps to use your personal information only in ways that are compatible with this Privacy Policy. The following policies apply to PEO's websites (including entire PEO network), future newsletters, opt-in mailing lists owned and operated by PEO.

What information does PEO collect and how do we collect it?

Every computer connected to the Internet is given a domain name and a set of numbers, that serve as that computer's "Internet Protocol" (IP address). When a visitor requests a page from any website within PEO's network, our web servers automatically recognize that visitor's domain name and IP address. The domain name and IP address reveal nothing personal about you other than the IP address from which you have accessed our site. We use this information to examine our traffic in aggregate, and to investigate misuse of our network or to cooperate with law enforcement. We do not collect and evaluate this information for specific individuals. Our web servers do not automatically record email addresses of the visitors.

What are cookies?

From time to time, PEO may send a "cookie" to your computer. A cookie is a small piece of data that is sent to your Internet browser from a web server and stored on your computer's hard drive. A cookie cannot read data from your computer's hard disk or read cookie files created by other websites. Cookies do not damage your system. We use cookies to identify which areas of PEO's network you have visited or customized, so the next time you visit, those pages may be readily accessible. You can choose whether to accept cookies by changing the settings of your Internet browser. You can reset your browser to refuse all cookies, or allow your browser to show you when a cookie is being sent. If you choose not to accept these cookies, your experience at our site and other websites may be diminished and some features may not work as intended.

How does Professional Engineers Ontario protect my privacy?

When you are on a Professional Engineers Ontario website and are asked for personal information, you are sharing that information with Professional Engineers Ontario alone. Professional Engineers Ontario will not disclose any of your personally identifiable information except under special circumstances, such as when we believe in good faith that the law requires such a disclosure. Professional Engineers Ontario does not share personal information you provide to us with other companies. For more details about how PEO uses personal information, see the general PEO Privacy Policy described below.

What other information do we request?

We may also request your email address or mailing address for the purposes of conducting a survey or to provide additional services (for example, event registration confirmation, subscriptions to email newsletters, announcement lists or information about conferences and trade shows). Whenever we request the identity of a visitor, we will clearly indicate the purpose of the inquiry before the information is requested. We maintain a strict "No-Spam" policy that means that we do not sell, rent, or otherwise give your email address to a third party, without your consent or as permitted by PEO's Privacy Policy.

When practitioners update their general records on PEO's website (e.g., licence or renewal of licence information), that information is entered into PEO's general database for practitioners. The information is used for PEO's general regulatory purposes. For more details about how PEO uses personal information about practitioners, see the general PEO Privacy Policy described below.

When you sign up for PEO's Forum, your name or alias is recorded solely for purposes of maintaining your own account within the Forum.

Will PEO disclose the information collected to outside third parties?

PEO will disclose personal information and / or an IP address, when required by law or in the good-faith belief that such action is necessary to:

- 1) Cooperate with the investigations of purported unlawful activities and conform to the law or comply with legal process served on PEO,
- 2) Protect and defend the rights or property of PEO's network of sites and related properties, or visitors to PEO's network of sites and related properties, and / or
- 3) Identify persons who may be violating the law, (for more details see the Professional Engineers Ontario Website Terms of Use and Legal Restrictions notice), or otherwise misusing PEO's network or its related properties.
- 4) PEO will not disclose personal information to third parties for commercial purposes.

What else should I know about my privacy when online?

PEO's web site contains many hyperlinks to third party websites. PEO is not responsible for the privacy practices or the content of such third party websites or portals. PEO does not share any of the individual personal information you provide us with the third parties to which PEO links.

Please keep in mind that whenever you voluntarily disclose personal information online - for example through email, discussion lists, or elsewhere - that information can be collected and used by others. In short, if you post personal information online that is accessible to the public, you may receive unsolicited messages from other parties in return. Ultimately, you are solely responsible for maintaining the privacy of your personal information. Please be careful and responsible whenever you are online.

Your consent to this agreement

By using PEO's Internet network, you consent to the collection and use of information by PEO as specified above. If we decide to change our Privacy Policy, we will post those changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it.

Please send any questions about PEO's Internet Privacy Policy to: webmaster@peo.on.ca
Please note that your use of PEO's network of websites is governed by our [Legal Notice](#).

PEO's general Privacy Policy

PEO's Internet Privacy Policy is a sub-policy of the general PEO Privacy Policy. For more information on PEO's Privacy Policy, see www.peo.on.ca or contact the Chief Privacy Officer who can be reached at:

Chief Privacy Officer
101-40 Sheppard Avenue West
Toronto, ON, M2N 6K9
email: privacy@peo.on.ca
telephone: (416) 224-1100 or (800) 339-3716
fax: (416) 224-8168 or (800) 268-0496

Privacy Sub-Policy No. 3

Access and Correction Request Procedure

Where PEO holds personal information about an individual, upon written request, PEO shall allow access to the information to that individual, unless providing access could reasonably be expected to interfere with the administration or enforcement of the *Professional Engineers Act* or it is impracticable or impossible for PEO to retrieve the information.

In some situations access may be obtainable by making an informal request to the appropriate PEO staff person. Otherwise, individuals may obtain their personal information or seek access to their individual files by making a written request to PEO's Chief Privacy Officer.

For example, PEO may decline to provide access to personal information where granting access could reasonably be expected to interfere with the regulatory activities of PEO, including:

- a. access may reasonably interfere with a regulatory process of PEO including an inquiry, investigation or hearing;
- b. access may reasonably reveal a confidential source of information or otherwise breach a confidence that is reasonably necessary for PEO to protect;
- c. access may reasonably reveal personal information about another person that cannot be severed and who has not consented to the access;
- d. access may reasonably interfere with the regulatory or enforcement activities of another statutory regulatory body or a law enforcement agency;
- e. access may reasonably place the health or safety of a person at risk;
- f. access is reasonably available from another, more appropriate source;
- g. access may reasonably reveal legally privileged information; or
- h. access is prohibited by another Act.

PEO shall permit an individual who has access to personal information to have PEO correct statements of fact in records of the personal information about the individual that are inaccurate or incomplete, unless making corrections could reasonably be expected to interfere with the administration or enforcement of the *Professional Engineers Act*. For example, PEO may decline to correct personal information where correcting the personal information could reasonably be expected to interfere with the regulatory activities of PEO, including:

- a. the person requesting the correction does not provide sufficient information to enable PEO to assess the request to make the correction;
- b. the fact that the statement was made, whether it is correct or not, is relevant to the regulatory activities of PEO;
- c. correction may reasonably interfere with a regulatory process of PEO including an inquiry, investigation or hearing;
- d. correction may reasonably interfere with the regulatory or enforcement activities of another statutory regulatory body or a law enforcement agency;
- e. correction may alter an original document that belongs to someone else and will eventually be returned to that person; or
- f. correction is prohibited by another Act.

Where PEO agrees to correct a record of personal information, the correction shall be made so as not to obliterate the original entry.

Where PEO agrees to correct a record of personal information, PEO shall provide written notice to every third party to whom the original record was provided within the previous 12 months unless to do so is impractical (e.g., website access) or would reasonably interfere with the regulatory activities of PEO.

Where PEO declines a request to correct a record of personal information, it shall file any statement of disagreement provided by the individual to whom the information relates of less than 500 words with the record unless to do so is impractical or would reasonably interfere with the regulatory activities of PEO.

An individual is not entitled to have PEO make a correction if PEO determines that it does not have sufficient knowledge, expertise or authority to make the correction.

If the individual is not satisfied with the Chief Privacy Officer's response to the access or correction request, he or she may have the decision reviewed by the Privacy Review Councillor in accordance with Principle 10 of PEO's Privacy Policy.

Privacy Sub-Policy No. 4

Privacy Safeguards

PEO shall take reasonable steps to ensure that personal information in its custody or under its control is protected against unauthorized access, use or disclosure and to ensure that the records containing the information are protected against unauthorized copying, modification or destruction. What constitutes reasonable steps shall be determined in light of all the circumstances, including the sensitivity of the information, the amount of information and the format in which it is stored. These measures shall include the following:

Organizational Measures

The following are policies with which PEO expects PEO staff and volunteers to comply.

Human Resources shall provide all staff and volunteers with a copy of PEO's Privacy Policy and relevant Privacy Sub-Policies upon hiring, retainer, selection or appointment.

Human Resources shall obtain from all staff and volunteers a signed confidentiality agreement upon their hiring, retainer, selection, election or appointment as follows, or other Council approved form:

Confidentiality Agreement

I acknowledge that I have access to personal and other confidential information on behalf of PEO. I also acknowledge receiving and reviewing PEO's Privacy Policy and its Privacy Sub-Policy on Privacy Safeguards. I also acknowledge reviewing the confidentiality provision for PEO found at s. 38 of the *Professional Engineers Act*. I appreciate the importance of privacy to PEO. I understand and agree to comply with s. 38 and PEO's Privacy Policy and Privacy Sub-Policy on Privacy Safeguards. I understand that failure to comply with this confidentiality agreement can result in action against me up to and including termination from my position.

Date:

Signature:

The Chief Privacy Officer or his or her delegate provides training in privacy issues to new staff and appropriate volunteers at least once a year.

Staff and volunteers shall only have access to personal information on a need-to-know basis.

Staff and volunteers shall deliver paper information or physical electronic information containers (e.g., a computer disk or CD) to others through sealed, addressed envelopes or boxes by Canada Post or by a reputable courier company. Sensitive personal information shall be marked "private and confidential". Courier deliveries of sensitive personal information shall require a signature for delivery.

When sending a fax containing personal information, staff or volunteers shall use caution in ensuring that the recipient's fax number is accurate and that the recipient fax machine is secure or that the recipient has established safeguards to the sending of the fax to an unsecured machine. All faxes containing personal information shall have a fax cover sheet that states as follows:

IF THERE IS A PROBLEM WITH THE TRANSMISSION OF THIS
FAX, PLEASE CALL PROFESSIONAL ENGINEERS ONTARIO AT
(416) 224-1100 EXT. 0 AS SOON AS POSSIBLE.

Warning: This facsimile is directed in confidence and is intended for use only by the individual or entity to which it is specifically addressed. Any other distribution, copying or disclosure is strictly prohibited. The contents of this facsimile may also be subject to privilege and all rights to that privilege are expressly claimed and not waived. If you have received this facsimile in error, please notify us immediately by telephone, and return the original transmission to us by mail, without making a copy. Thank you for your cooperation.

Staff and volunteers do not discard paper containing personal information in the garbage or a blue box for recycling. Even hand-ripping paper containing personal information is not considered secure. Rather such paper is to be securely shredded. To facilitate shredding, locked boxes with a slot for the depositing of personal information are distributed at strategic locations throughout PEO's office. Volunteers shall deliver paper containing personal information to PEO's office for shredding.

Staff and volunteers shall report any security breach (e.g., the theft or loss of a paper or electronic file) to the Chief Privacy Officer immediately upon discovery.

If staff or volunteers transport personal information (whether in paper or electronic format), the personal information shall either be in the possession of the staff person or volunteer or be locked out of sight (e.g., in the trunk of a car). At home the personal information shall be locked in a desk, a cabinet or a room to which only the person and, in rare cases, a trusted cohabiting person, have a key. PEO believes that too many visitors come to most homes to treat the entire home as secure.

PEO uses many agents, consultants and service providers (e.g., PEO's lawyers, accountants, IT consultants, external storage services, telecommunications firms) to help it process personal information or achieve PEO's regulatory goals. PEO protects the personal information by obtaining appropriate privacy assurances stipulating or

confirming the safeguarding of the information and restricting the purposes for which it is to be used. The preferred privacy assurance is a written statement from the agent, consultant or service provider worded similarly to the following:

The Firm is covered by the *Personal Information Protection and Electronic Documents Act* in respect of any personal information that it collects, uses and discloses. The Firm will only use the personal information transferred to it by PEO (including an indirect transfer by incidental access to the personal information) for the purpose for which it was transferred. The Firm will maintain the security of the information. The Firm will either return the personal information to PEO or the Firm will destroy it in a secure manner as soon as the purpose for which it was transferred is complete. The Firm will not disclose the personal information to anyone outside of its organization without the prior consent of PEO unless required to do so by law. The Firm will obtain a similar privacy assurance if anyone is provided access to the personal information to assist the Firm in the performance of its duties for PEO.

However, some agents, consultants or service providers may be unwilling to provide an individualized written privacy assurance to PEO (e.g., a large telecommunications firm for which PEO is a relatively minor client). PEO may still continue to use those agents, consultants or service providers if it receives an adequate oral privacy assurance from one of its representatives or if the agent, consultant or service provider has an appropriate published privacy policy.

Physical Measures

During business hours personal information is protected by requiring all visitors to sign in, wear badges and, if not a provider of a privacy assurance (see organizational measures above) being continuously and personally accompanied by PEO staff. Even with these safeguards PEO staff and volunteers shall keep particularly sensitive personal information locked in a cabinet or room or under the direct supervision of another PEO staff person if leaving personal information unattended.

Outside of office hours, PEO staff shall lock personal information in an office or a cabinet. Generally only senior PEO staff have a key for entering the premises outside of office hours. A very limited number of volunteers and agents who have an established relationship with PEO have their own keys. Keys are electronic and their use is recorded. Security staff patrol the premises during evening hours.

Technological Measures

Computers are protected by passwords for logging on and by automatic screen savers with password protection.

Staff and volunteers shall not discuss personal information on a cell phone on an analogue setting. Even when using a cell phone on a digital setting, staff and volunteers shall attempt not to use names or other identifying information when discussing sensitive personal information.

Staff and volunteers are discouraged from using non-PEO computers for processing personal information. Where it is necessary to use a non-PEO computer, the personal information shall be used on a disk only and not stored on the hard drive of the computer. When not in use, the disk shall be locked away. It is impossible to ensure the security of non-PEO computers outside of PEO's office.

PEO laptop computers are password protected for logging on and have an automatic screensaver that is also password protected. When not in use and while outside of PEO's office, laptop computers shall be locked away.

PEO does not treat unencrypted email as secure. Staff and volunteers shall adopt at least one of the following safeguards for sensitive personal information:

- a. the information must be anonymized
- b. the consent of all identifiable individuals whose personal information is contained in the email (including attachments) must be obtained or
- c. appropriate encryption must be used.

As an added precaution, PEO staff and volunteers communicating on PEO matters shall use the following warning in their email messages:

This message, including any attachments, is privileged and may contain confidential information intended only for the person(s) named above. Any other distribution, copying or disclosure is strictly prohibited. If you are not the intended recipient or have received this message in error, please notify me immediately by reply email and permanently delete the original transmission from me, including any attachments, without making a copy. Thank you.

Electronic storage media (e.g., disks, CD's, hard drives) are either physically destroyed or securely reformatted in accordance with PEO IT protocols when PEO no longer needs it.

PEO's information technology services have written policies on the various aspects of its information technology systems to ensure that they are sound. For example, PEO has written policies in respect of its major operational systems, protective programs and systems, back up of databases and information, password policies, internet, software updating, remote access and user account removal. The policies and the underlying systems and practices are periodically reviewed and audited.

Privacy Sub-Policy No. 5

Records Retention Policy

[Because of its size, this Sub-Policy is provided separately.]

Privacy Sub-Policy No. 6

Privacy Complaints Procedure

Questions or concerns about PEO's compliance with its Privacy Policy should be directed to the Chief Privacy Officer who can be reached at:

Chief Privacy Officer
101-40 Sheppard Avenue West
Toronto, ON, M2N 6K9
email: privacy@peo.on.ca
telephone: (416) 224-1100 or (800) 339-3716
fax: (416) 224-8168 or (800) 268-0496

The Chief Privacy Officer will assign the appropriate PEO staff person to try to resolve the question or concern.

If PEO cannot satisfactorily resolve a question or concern, the individual can make a formal complaint to the Chief Privacy Officer. The Chief Privacy Officer shall receive and ensure the timely investigation of the complaint. The complaints process shall be as follows:

- (a) The Privacy Office shall acknowledge receipt of the complaint in writing and provide the individual with a copy of this Privacy Complaints Procedure.
- (b) The Privacy Office shall investigate the complaint, including obtaining the pertinent documents, taking a statement from relevant witnesses and conducting any necessary research. The Privacy Office shall then prepare a written report of the findings and provide it to the person making the complaint.
- (c) The report shall be provided within 30 days of the complaint. If the Privacy Office is unable to complete the report within 30 days, the Privacy Office shall advise the person making the complaint of the delay and the anticipated date of completion of the report.
- (d) Where the complaint is substantiated the Privacy Office shall implement appropriate changes to PEO's Privacy Policy and practices to ensure compliance in the future.
- (e) If the person making the complaint disagrees with the report, he or she can ask the Privacy Review Councillor to review the treatment of the complaint by filing a written request setting out the grounds for the request with the Privacy Review Councillor and the Privacy Office within 30 days of the Privacy Office's report. The Privacy Office shall have 30 days to provide to the Privacy Review Councillor and the person making the request a written

response to the request. The Privacy Review Councillor shall review the written submissions, make any other inquiries he or she deems appropriate and shall make a report to the person making the request and the Privacy Office. Where the report contains recommendations for improvement of PEO's Privacy Policy and practices, the Privacy Review Councillor will also transmit a copy of the report to the Council.

Privacy Sub-Policy No. 7

Privacy Brochure

To Be Formatted Into a Three Panel Folded Over Brochure

PEO Privacy Policy

PEO is committed to responsible behaviour when collecting, using and disclosing personal information about practitioners and others. It has established a detailed Privacy Policy and a Privacy Office to achieve this goal. While PEO is not covered by privacy legislation (since it does not engage in commercial activities), it has chosen to meet contemporary privacy expectations.

PEO Collects Personal Information

Personal information means any information about an identifiable individual other than business contact information. PEO collects personal information about applicants, practitioners and others in order to regulate the profession and practice of professional engineering in the public interest. Examples include:

- qualifications and good character information of applicants for licences
- contact and practice information about practitioners
- evidence about complaints or other concerns about practitioners
- the suitability and support needs of volunteers
- references about applicants and practitioners
- unlawful practice by unlicensed persons
- opinions about how PEO can better serve practitioners and the public
- for the security of visitors and information at PEO's office

Why PEO Collects Personal Information

PEO collects, uses and discloses personal information in order to regulate the profession and practice of professional engineering. The purpose of collection is usually fairly obvious (see the examples listed above). For instance, PEO needs to:

- communicate with applicants and practitioners
- assess their qualifications
- provide educational information
- investigate complaints
- recruit volunteers
- prevent unlawful practice
- consult with stakeholders
- provide information to the public about practitioners
- secure confidential information

PEO Safeguards Personal Information

PEO recognizes that personal information is sensitive. It must be protected against unauthorized access, use, disclosure, copying, modification or destruction. PEO safeguards personal information by:

- **Organizational Measures**
 - Access on a need-to-know basis
 - Confidentiality agreements signed by staff and volunteers
 - Defined retention periods
 - Strict rules for information removed from office
 - Fax, courier and mail protocols
 - Privacy training
 - Privacy assurances from PEO's suppliers

- **Physical Measures**
 - Visitors must sign in and are accompanied by staff
 - Sensitive files are locked away
 - Shredding of discarded files

- **Technological Measures**
 - Password protection of computers
 - Virus and firewall protection for network
 - Secure website
 - Unencrypted email treated as insecure
 - Written and audited policies and procedures

Access and Correction of Personal Information

PEO allows access to personal information held about an individual unless it would reasonably be expected to interfere with the enforcement of the *Professional Engineers Act* or the administration of PEO. For example, a person under investigation cannot see the evidence gathered if it will jeopardize the integrity of the investigation.

An individual having access can correct any factual errors in the information. If there is disagreement the individual can file a statement of disagreement.

PEO has a Privacy Officer

Questions, concerns or formal complaints about PEO's privacy practices should be directed to the Chief Privacy Officer who can be reached at:

Chief Privacy Officer
101-40 Sheppard Avenue West
Toronto, ON, M2N 6K9
email: privacy@peo.on.ca

telephone: (416) 224-1100 or (800) 339-3716
fax: (416) 224-8168 or (800) 268-0496

For More Information

The full Privacy Policy can be obtained at PEO's website at www.peo.on.ca or by calling or writing the Chief Privacy Officer.

Privacy Sub-Policy No. 8
Commercial Tenant Privacy Policy

Introduction

PEO's Facilities Group (Facilities) for 40 Sheppard Avenue West, Toronto, ON, M2N 6K9

(the Building) is a part of PEO. They are not separate legal entities. They further the mandate of PEO. Their mandate, objectives and essential purpose are as follows:

Mandate

Facilities is the representative of Professional Engineers Ontario at the Building and is tasked with the responsibilities of assisting PEO in meeting the objectives of the PEO organization and its real estate interests.

Objectives

Through building presence and activities, Facilities will:

- Assist with the on-going relationship with PEO's Property Management (PM) service provider;
- Work to identify adherence to the PM contract;
- Promote and enhance the image of PEO; and
- Actively participate in all aspects of operational issues of the Building.

Essential Purpose

The essential purpose of Facilities is through the following initiatives.

12. Enhance the professional image of PEO through constant improvements to the Building.
13. Over site of the Master Services Agreement (MSA)
14. Provide guidance and input to PM service provider in order to have them fully understand PEO's vision for the Building.
15. Provide timely and current information to all stakeholders.
16. Provide an active communication link between the PEO stakeholders and the PM service provider with regards to:
 - a. PEO Building Vision;
 - b. The Building budget planning and overseeing the budget.
17. Provide guidance and direction to the Leasing Group.

The major activities of Facilities are: over site of the MSA, and to provide guidance and instruction to the PM and Leasing Groups. These activities would generally be operated on a cost recovery basis.

Since Facilities is a part of PEO, the general PEO Privacy Policy applies to Facilities except for the specific modifications set out below. However, since Facilities is fairly autonomous in its structure and activities, it has distinct privacy challenges. Some of the unique features of the Privacy Policy for Facilities are set out below.

Principle 1 - Accountability

The Manager, Building Operations, is the Facilities Privacy Officer. He or she is responsible for ensuring that PEO's Privacy Policies are applied to the personal information collected, used or disclosed by Facilities.

The Facilities Privacy Officer has the assistance of the Chief Privacy Officer of PEO.

The Chief Privacy Officer or his or her delegate reviews with the Facilities Privacy Officer at least once a year the privacy responsibilities of Facilities.

The Chief Privacy Officer can be reached at:

Chief Privacy Officer
101-40 Sheppard Avenue West
Toronto, ON, M2N 6K9
email: privacy@peo.on.ca
telephone: (416) 224-1100 or (800) 339-3716
fax: (416) 224-8168 or (800) 268-0496

Principle 2 - Identifying Purposes for Collection of Corporate Information

The Facilities Privacy Officer shall ensure that the purpose of any collection of Corporate information is identified at the time of collection. Ordinarily the purpose will be obvious (e.g., lease negotiations, rent collection, banking information, credit reports, etc.). However, where the purpose may not be obvious (e.g., collecting home contact information from a lessee) the Facilities Privacy Officer will ensure that the purpose is identified and consent is obtained.

Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Corporate Information

Generally consent is obtained for the collection, use and disclosure of Corporate information by Facilities. The consent may be implied where the purpose is obvious (e.g., sign up sheets for receipt of email notices of future communications). However, where the purpose may not be obvious (e.g., collecting home contact information from a Lessee) the Facilities Privacy Officer will ensure that consent is obtained.

Principle 4 - Limiting Collection of Personal Information

The Facilities Privacy Officer will ensure that the minimum collection of Corporate information to reasonably achieve the purpose is obtained.

Principle 5 - Limiting Use, Disclosure and Retention of Corporate Information

The Facilities Privacy Officer will ensure that Corporate information is used, disclosed and retained only for the purpose for which it was collected, for similar related uses, disclosure and retention that reasonably flow from them, for regulatory uses for which consent is not reasonable and for new uses, disclosure or retention for which a separate consent has been obtained.

The Facilities Privacy Officer will go through Facilities records once a year to securely destroy or return to PEO head office any Corporate information that is no longer necessary to keep for its purpose.

Principle 6 - Accuracy of Corporate Information

The Facilities Privacy Officer will take reasonable steps to ensure that the Corporate information is accurate. This is generally simple since most of it is self-reported by the affected Corporation and is updated regularly if needed on an on-going basis by the Corporation.

Principle 7 - Safeguards

The Facilities Privacy Officer will take reasonable steps to safeguard the Corporate information held by Facilities in a manner consistent with PEO's Privacy Sub-Policy on Privacy Safeguards. Generally, the Corporate information will be kept under lock and key (e.g., locked cabinet) and once a year be pruned and the discarded information will either be shredded or couriered to the Chief Privacy Officer for shredding.

The Facilities Privacy Officer will endeavour to encourage all Facilities members to delete emails containing Corporate information immediately after use and generally keep any other electronic information on a disk stored with the Facilities Privacy Officer in a locked area after use.

Principle 8 - Openness Concerning Privacy Policies and Practices

PEO's general Privacy Policy and this Facilities Privacy Policy is available on PEO's website and in paper form upon request from the Facilities Privacy Officer or the Chief Privacy Officer.

Principle 9 - Access to Corporate Information

The Facilities Privacy Officer will handle simple requests for access to the Corporate information and any resulting correction requests locally in accordance with the principles of PEO's Privacy Policy. If the request raises any issues of concern the Facilities Privacy Officer shall immediately refer the request to the Chief Privacy Officer and work with the Chief Privacy Officer to process the request appropriately.

Principle 10 - Challenging Compliance

The Facilities Privacy Officer will try to resolve any simple concerns expressed about the handling of Corporate information locally in accordance with the principles of PEO's Privacy Policy. However, if the concern is complex and not easily resolvable by the Facilities Privacy Officer's explanation to the individual, the Facilities Privacy Officer shall immediately refer the request to the Chief Privacy Officer and work with the Chief Privacy Officer to process the concern appropriately.