

## **CAPPA Privacy Policy**

CAPPA's Privacy Officer is:

Sheila McFadyen, CEO Suite 300, 840 6 Avenue SW Calgary, Alberta T2P 3E5

Main Office Phone: 403.265.1533

Privacy Statement: CAPPA collects personal information from our members, students and customers in the regular course of doing business. The information in this document outlines what information we collect, what we use it for and how we are protecting the information you entrust to us.

We do not collect any personal information without knowing why we are doing so.

CAPPA complies with Canada's Anti-Spam Legislation (CASL), Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) and Alberta's Personal Information Protection Act (PIPA).

CAPPA collects the following Member/Student/Customer information:

# **Contact Information**

Name Address(es) Postal Code(s) Phone Number(s) Employer/Business Job Title Email Address(es)

### **Purchase Information**

Membership Dues Purchase History

# Opinions/Interests

Member/Student/Customer Satisfaction Information Opinions about Products and Services

#### Website Information

Staff and Volunteer names and contact information may be displayed on our website

#### <u>Association Management Software (Data System)</u>

Member names and select contact information is displayed to other members behind log-in. Members may select a privacy option within their profiles.

The reason CAPPA retains this information is:

To complete a sale/transaction
To complete and issue a graduation certificate
Marketing
Broadcast of Information
Customer Service
Customer Relationship Management
Contests/Survey
Delivery of Services
Application Forms
Member networking

The above information is stored electronically.

### Consent Practices as they relate to Privacy:

"Consent is voluntary agreement with what is being done or proposed. Consent can be either express or implied. Express consent is given explicitly, either orally or in writing. Express consent is unequivocal and does not require any inference on the part of the organization seeking consent. Implied consent arises where the consent may reasonably be inferred from the action or inaction of the individual." (Excerpt from the Office of the Privacy Commission of Canada)

We will make strident efforts to ensure that when collecting Opinions about Products and Services or Customer Satisfaction, eg Surveys, that we will have the member's Express Consent.

To complete a sale or other transaction, CAPPA has Implied Consent to facilitate Customer Purchases and Delivery of Purchases, such as receipt of payment for Seminars. The information collected will be what is necessary to complete the action.

Members/Students/Customers who do not wish their information used by CAPPA for secondary purposes such as Marketing, Administering any type of loyalty program or customer relationship management may Opt Out.

Members are required to uncheck the email communications boxes within their behind log-in profiles. Students and Non-members who are customers can email us at <a href="mailto:office@cappa.org">office@cappa.org</a> or complete the "unsubscribe" found in CAPPA email communications.

Members, Students and Customers may withdraw their consent at any time.

## Employee/Contractor/Volunteer Access to Information

No CAPPA employees, contractors or volunteers see or processes information unnecessarily. This reduces the risk of inappropriate use or disclosure. Our staff are aware of their obligation to protect privacy. No personal information will be used or released without certainty of the identity of the requestor and that person's right of access.

#### Storage of Personal Information: Paper Files

Member/Student/Customer information is stored electronically. Should a need to retain a paper copy arise, CAPPA fully commits to storing such information in a locked cabinet with restricted access and will be shredded when the need ceases to continue to retain.

#### Storage of Personal Information: Electronic Files

CAPPA commits to taking all measures possible in order to safely store our Member/Student/Customer's personal information. Those measures include:

Computer passwords
Data Management System passwords
Firewalls
Encryption

Member/Student/Customer information will not be stored on USB keys or smartphones.

### Third Parties List

CAPPA does not currently share Member information with Third Parties without directly receiving consent for the specific purpose, eg Petrinex registration for Students.

Should CAPPA offer new Member Benefits where verification of membership is required in order to receive the benefit or service, only the necessary information to verify your membership will be shared for that purpose.

CAPPA commits to review the privacy practices of these firms to make sure that they meet the same standards that the Association adheres to. Contractual agreements will reflect same and will include:

- requiring the third party to protect our membership information
- provide CAPPA the power to audit the third party to make sure they're complying with fair information practices
- making sure the third party only uses the information for the purposes set out in the contract
- requiring the third party to pass on to CAPPA any requests from members to see their [member] customer records

## Complaints

Complaints regarding CAPPA's Privacy Policy or handling of personal information may be directed to CAPPA's Privacy Officer (noted above).

# Alternatively, complaints may be directed to:

Office of the Information and Privacy Commissioner of Alberta

410, 9925 - 109 Street, Edmonton, Alberta T5K 2J8

Phone: (780) 422-6860 Toll Free: 1-888-878-4044 Email: generalinfo@oipc.ab.ca Web Site: http://www.oipc.ab.ca

Office of the Information and Privacy Commissioner Suite 2460, 801 6 Avenue SW, Calgary, AB, T2P 3W2 Phone: (403) 297-2728

Fax: (403) 297-2711
Toll Free: 1-888-878-4044
Email: generalinfo@oipc.ab.ca
Web Site: www.oipc.ab.ca