
THE COLLEGE OF PEDORTHICS OF CANADA (the “College”)

PRIVACY CODE

This Privacy Code informs you of our commitment to and policy on privacy. It tells you the ways we ensure that your privacy and the confidentiality of your information are protected.

Many of you have questions about how we are handling the information we obtain from you when you visit our website. We developed a Website Privacy Policy to answer your questions about the information we collect when you visit our website and how we use it. To review the full text of our Website Privacy Policy, please visit www.certifiedpedorthists.ca or contact our Privacy Officer toll free at 1-866-819-4354 or by fax at (866) 819-4352.

TABLE OF CONTENTS

- ▶ Our Commitment to Privacy
- ▶ Our Privacy Code
- ▶ Why We Ask For Your Information
- ▶ Why We Ask Others For Information About You
- ▶ When We Disclose Your Information
- ▶ How We Protect Your Information
- ▶ Your Right To Access Your Information
- ▶ Keeping Your Information Accurate
- ▶ Recording Your Options
- ▶ Updating this Privacy Code
- ▶ Who Can Answer Your Questions About Privacy

OUR COMMITMENT TO PRIVACY

Protecting your privacy and the confidentiality of your personal information is fundamental to the way we operate. This Privacy Code informs you of our policy on privacy and tells you about the ways we ensure that your privacy and the confidentiality of your information are protected. It is our intention to manage and handle personal information in a manner consistent with the provisions of the *Personal Information Protection and Electronic Documents Act* (Canada) and other applicable provincial privacy legislation.

OUR PRIVACY CODE

Our Privacy Code covers treatment of personally identifiable information we collect, use and disclose about identifiable individuals, such as our candidates and members. It does not apply to the practices of companies or organizations that the College does not own or control, or to people the College does not employ or manage. When we use the words "personal information" or "information" in this Privacy Code, we mean information about an identifiable individual, excluding the name, title, business address or telephone number of an employee of an organization and other information not considered to be "personal information" by applicable privacy legislation in Canada.

The following sets out our purposes for collecting, using, retaining and disclosing personal information:

- to enforce the regulation and certification of pedorthists and to protect the public by ensuring standards for quality and service of pedorthists;
- to establish and maintain a relationship with individuals as candidates for membership or as certified members of the College and to provide and promote services suited to the present and future needs and requirements of such individuals;
- to establish, maintain and publish a directory to promote the interests of the College and its members
- to liaison, consult and negotiate with service and product providers to provide and promote services and products suited to the present and future needs and requirements of the College's members;
- to fulfill its public duty, to detect and prevent fraud, and to safeguard the interests of the College and its members;
- to meet and adhere to legal, contractual, governmental and regulatory requirements;
- to manage the College's operations, to maintain adequate accounting and tax records, to administer billings and invoices, to assess the quality and quantity of the College's services and to have information in such form as the College may reasonably require;
- to achieve any other purpose to which you have given your consent.

Our Privacy Code consists of five key principles:

1. Collecting and Using Information

At the College, we gather and use personal information of candidates and members primarily in connection with the regulation and certification of pedorthists, and to protect the public by ensuring standards for quality and practise.

We collect, use, retain and disclose information about you only with your consent, except as outlined in this Privacy Code. In obtaining your consent, whether express or implied, the purposes for which we require your information are outlined herein. If our purposes differ than those outlined herein, we will advise you of our new purposes at the time of collection of your information.

We will limit the information we collect to what we need for the identified purposes (including those purposes set out above), and we will use it only for those purposes. We will obtain your consent if we wish to use your information for any other purpose.

We may depart from this consent principle only in accordance with the limited exceptions described in this Privacy Code, when permitted by other written and

posted policies established by the College, or where required or permitted by applicable legal, governmental or regulatory requirements.

2. Releasing Information

We may provide your information to other persons, but only:

- where we have your consent, whether express or implied;
- to suppliers, agents and other third parties, such as related organizations and associations, who assist us in serving you; or
- where we are required or permitted by law to do so.

3. Protecting Information

We will protect your information with appropriate safeguards and security measures. We will retain your information only for the time that it is reasonably required by us.

4. Providing Information Access and Accuracy

We will give you access to the information we retain about you. We will make every reasonable effort to keep your information accurate and up-to-date.

5. Respecting and Responding to Your Privacy Concerns

We will explain your options of refusing or withdrawing consent to the collection, use and disclosure of your information, and we will record and respect your choices. We will investigate and respond to your concerns about any aspect of our handling of your information.

In this Privacy Code, we will explain how we fulfill each of these important principles.

WHY WE ASK FOR YOUR INFORMATION

We ask you for information to establish and serve you as our member.

We obtain most of our information about you directly from *you*. For every candidate and member, we need your name, company and home addresses and telephone numbers – your contact information. Here is why we need some of the other information we ask you to provide.

- **E-mail**

This helps us contact you. (Your e-mail, if provided, is considered part of your contact information.)

- **Credit Card Number (optional)**

Providing your Credit Card number is optional. This enables you to pay the College fee by credit card rather than by cheque.

- **Education/Pedorthic Experience/References**

This is used to assess your qualifications and examination eligibility.

We only collect the information we need and only use it for the purposes explained to you

We indicate in this Privacy Code how we use your information where you apply to be certified as a member of the College or you wish to apply for an examination. If we wish in the future to use your information for a purpose not previously disclosed to you, we will ask you for your consent at that time.

WHY WE ASK OTHERS FOR INFORMATION ABOUT YOU

With your consent, we may obtain information about you from third parties to verify the information you have provided and to obtain additional information about you.

We may contact educational institutions, employers or other personal references to verify information that you have given us. We will not do this without your consent, but please remember that if you do not give your consent we may not be able to accept your application for examination or completed examination paper.

WHEN WE DISCLOSE YOUR INFORMATION

Under no circumstances do we sell lists or information to others. We release your information to parties outside the College only under the following circumstances:

- **With Your Consent**

We will disclose your contact information in our directory and to related organizations, such as the Pedorthic Association of Canada, in order to serve you. We release only your contact information, which may include your e-mail address.

- **For Servicing Purposes**

We will disclose your information to a trustworthy independent third party organization who the College has retained to manage the College's operations. We also may give a limited amount of information to suppliers and other agents, (such as volunteers who assist us in marking your examination).

- **When Required or Permitted By Law**

We must give information in response to a valid demand, search warrant or other legally valid enquiry or order. We may disclose information to the authorities to serve a clear public interest and fulfill our public duty - such as to protect against fraud or other criminal activity. We may take action to protect the interests of the College which may result in disclosing information to third parties, such as collection agents for the purpose of collecting overdue accounts. We may disclose information under an exception to the requirement for consent expressly set out in applicable laws, such as the exception for disclosure necessary to protect human life or safety in an emergency.

In all such cases, we will only disclose your information to the extent we determine necessary to accomplish our purpose or discharge our legal or public duty. Whenever possible, we will require that the party receiving the information provides reasonable assurances that the privacy of your information will be respected and protected in accordance with applicable laws.

HOW WE PROTECT YOUR INFORMATION

We will protect your information with appropriate safeguards and security measures.

We have reasonable security standards to protect our systems and your information against unauthorized access and use. All employees and agents of the College are familiar with the procedures that must be taken to safeguard personal information.

We retain your information only as long as it is reasonably required by us.

The length of time we retain information varies depending on your relationship with us. This period may extend beyond the end of your relationship with us but only for so long as it is reasonably required by us or legally necessary for us to retain such information. When your information is no longer needed, we will destroy, delete, erase or convert it to an anonymous form.

YOUR RIGHT TO ACCESS YOUR INFORMATION

We will give you access to the information we have about you.

Most of your information is kept in the College's file about you. This file may be made available to you by contacting our privacy officer. If you require other information, simply contact our privacy officer. We will advise you in advance if a charge will be required for conducting the search, and will make every effort to respond to your request within 30 days.

Please note that we may not be able to provide information about you from our records if it contains references to other persons, is subject to legal privilege, contains information proprietary to the College, is too costly to retrieve, or cannot be disclosed for other legal reasons.

KEEPING YOUR INFORMATION ACCURATE

We will make every reasonable effort to keep your information accurate and up-to-date.

Having accurate information about you enables us to give you the best possible service. You can help by keeping us informed of any changes, for instance if you move or change telephone numbers. If you find any errors in our information about you, let us know and we will make the corrections immediately and make sure they are conveyed to anyone we may have misinformed. For information that remains in dispute, we will note your opinion in the file.

RECORDING YOUR OPTIONS

We will explain your options of refusing or withdrawing consent to the collection, use or disclosure of your information, and we will record and respect your choices.

In most cases, you are free to refuse or withdraw your consent at any time subject to legal and contractual restrictions and reasonable notice. You may do so by contacting our privacy officer, who will be pleased to explain your options and the consequences of refusing or withdrawing your consent. For example, if you refuse consent for us to do verification checks, we may not be able to process or accept your application for examination.

UPDATING THIS PRIVACY CODE

Any changes to the College's Privacy Code will be recorded in a timely manner. We may add, modify or remove portions of this policy when we determine it is appropriate to do so. However, we will not use any information collected prior to such changes for any new purposes without first obtaining your consent.

WHO CAN ANSWER YOUR QUESTIONS ABOUT PRIVACY

If you have any concerns or questions about privacy and confidentiality - or any concerns about the way a request for information was handled - you can take the following action.

Contact our Privacy Officer:

Jonathan Strauss:
Toll free 1-866-819-4354
Fax (866) 819-4352

Our Privacy Officer has the decision-making authority to resolve most concerns. However, if you are unsatisfied with the way your complaint or request was handled by our Privacy Officer, you may contact the federal Privacy Commissioner:

Office of the Privacy Commissioner
112 Kent Street
Ottawa, Ontario
K1A 1H3

Dated: Effective as of January 1, 2004