

**THE CHARTERED ACCOUNTANTS EDUCATION FOUNDATION
OF ALBERTA
PRIVACY POLICY
(August 2010)**

Our Commitment to Privacy

The Chartered Accountants Education Foundation of Alberta (“CAEF”) is committed to protecting the privacy and confidentiality of personal information of its employees, donors, volunteers, beneficiaries, stakeholders and those we serve. We value the trust placed in us and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the personal information that is provided to us. This Privacy Policy is a statement of principles and guidelines concerning the protection of personal information entrusted to us.

CAEF is incorporated under the *Societies Act of Alberta* and is supported by members of the Institute of Chartered Accountants of Alberta (“ICAA”). All administrative functions of CAEF are performed by employees of the ICAA, each of whom are required to maintain confidentiality over all information used in their position and to comply with this policy and the ICAA Privacy Policy (including compliance with the requirements of the *Personal Information Protection Act* and the *Regulated Accounting Profession Act*).

CAEF is responsible for personal information under its control and has designated the ICAA’s Privacy Officer as its Privacy Officer and the individual who will ensure compliance with this policy. This policy and additional information are available on request by contacting the ICAA offices by telephone 1-800-232-9406, by fax 780-425-8766, by email privacy@icaa.ab.ca or website www.albertaCAs.ca.

Personal Information

In this policy, CAEF identifies “personal information” as information that reveals a distinctive trait about or helps to identify an individual and is not available in the public domain. It does not include business contact information, including name, title or position, business address, and phone number.

Purposes of Data Collection

CAEF identifies the purpose for which information is collected at or before the time it is collected. Currently, CAEF gathers information for the following purposes, but not limited to the following:

- To manage donations/contributions made to CAEF, including issuance of income tax receipts
- To provide information concerning CAEF donation/contribution opportunities
- To determine candidate suitability and eligibility for funding from CAEF (e.g. financial assistance, grants, bursaries, scholarships)
- To recognize and advise the public of contributions of donors through CAEF donor recognition events, publications and website and other CAEF donor recognition opportunities
- To recognize and advise the public of recipients of CAEF funds through CAEF recipient recognition events, publications and website and other CAEF recipient recognition opportunities
- To provide general information that may be of interest concerning CAEF activities (e.g. annual report, award applications, donation opportunities, general information)
- For other purposes to which consent is given

Collection, Use and Disclosure Practices

CAEF does not sell, lease, or trade personal information to other parties. CAEF endeavours to ensure strict confidentiality is maintained over personal information. Employees are trained and required to maintain confidentiality over all information used in their positions and comply with this policy and the ICAA's Statement of Values and Ethics.

When an individual provides CAEF with personal information, it is reasonable to assume the individual has implied consent to its collection, use and disclosure in accordance with this Privacy Policy and subject to any collection, use and disclosure from which the individual has opted out.

CAEF shall in all respects comply with applicable privacy legislation. Therefore, in the course of collecting, using, disseminating, and storing personal information, CAEF will use its best efforts to ensure that:

- Consent to the collection, use, retention and disclosure of personal information exists. In obtaining consent, the purpose(s) for the collection, use and/or disclosure will be obvious by the very nature of the transaction or, if not, the purpose will be stated either at the time or before the information is collected.
- Any further use of this information is subject to consent, and CAEF routinely offers individuals the opportunity to opt not to have their information used for purposes beyond those for which it was explicitly collected.
- Information will be carefully protected from inappropriate or unauthorized use.
- Internally, access to personal information is based only on the need to deal with the information for the reason(s) for which it was collected.
- Personal information is stored in secured locations and on servers controlled by ICAA or at the offices of our service providers. Specific safeguards (physical, organizational and technological) are in place to ensure that the information is not shared or disclosed more widely than is necessary to achieve the purpose(s) for which it was collected.
- Measures are taken to ensure that the integrity of this information is maintained.

From time to time, CAEF may disclose personal information to:

- a) Volunteers and/or staff who act as adjudicators on behalf of CAEF in the assessment of applications for funding
- b) Service providers, including an organization or individual retained by CAEF to perform functions on its behalf (e.g. data processing, office/professional services, document management, bulk mailings) and specifically the ICAA
- c) Any third party or parties where consent to such disclosure is provided or where disclosure is required or permitted by law

Where personal information is transferred to outside service providers, all reasonable steps will be taken to ensure that any such provider has personal information procedures and policies in place that are at least comparable to those of CAEF.

Opt Out

An individual who wishes to withdraw consent for CAEF to use or disclose information provided may do so by advising, in writing, the CAEF's Executive Director. This may affect the CAEF's ability to provide services.

Access to Personal Information

Individuals may make a written request to the CAEF's Privacy Officer for access to their personal information, the purpose for which it is being used, and persons to whom that information has been disclosed and the circumstances surrounding its disclosure. The Information Officer will advise whether CAEF has a personal information record, whether the CAEF is providing access to all or part of the record and when and how access will be given, if applicable. An estimate of any cost for access will be provided.

CAEF endeavours to maintain accurate, up to date information. Individuals may make a written request to the Privacy Officer for the correction of their personal information. Any person whose personal information is held by CAEF has:

- a) the right to know of the existence of such personal information and to have access to that information to ensure that it is accurate, and
- b) the right to complain if that personal information is improperly collected, used, stored or disclosed.

Security of Information

When CAEF engages outside organizations to perform specialized services, CAEF provides these contract suppliers with only the information necessary to perform these services. All suppliers are required to comply with the CAEF privacy policy.

In addition, CAEF endeavours to maintain adequate physical, procedural and technical security for its offices, information storage and destruction, electronic files and on-line systems so as to prevent any unauthorized access, disclosure, copying, use or alteration of an individual's personal information.

Paper-based files are stored in secure operating premises. Electronic files are maintained in a secure environment with restricted access. Access to more sensitive information files such as donation information, are restricted to employees who require access to them.

CAEF web page: The CAEF web page is hosted on the website owned by the ICAA, located in Edmonton, Alberta. The ICAA website is protected as necessary, by alphanumeric passwords, physical protection and encryption. The website contains links to other websites. Although the CAEF believes the organizations to which links are provided are reputable and have high standards, the CAEF is not responsible for the content, actions or policies of these sites.

Under no circumstances is CAEF liable for any losses or direct, indirect, accidental, special or consequential damages owing or related to its web page or resulting use of the ICAA website.

Nothing contained on this web page is intended to provide or replace legal advice. Donors and their advisors seeking specific information or wishing to obtain a sample fund agreement or other documents for review are directed to contact CAEF directly.

Changes to Privacy Policy

CAEF reserves the right to modify or supplement this privacy policy at any time. We will update the Privacy Policy and privacy practices to comply with federal and provincial legislation as they may apply. Please check this Privacy Policy periodically for changes.

Questions or Concerns

Questions or concerns with this policy or personal information should be directed to our Privacy Officer at:
Chartered Accountants Education Foundation of Alberta
1900 TD Tower, 10088 – 102 Avenue,
Edmonton, AB, T5J 2Z1

A complaint may be made to the Information and Privacy Commissioner if CAEF's review of the matter is not satisfactory.