

# Privacy Policy



The Ontario Long Term Care Association believes that it is important for you to know how we treat your personal information. This Privacy Policy will explain why we collect, use and disclose personal information (information about an identifiable individual) about our members, and other individuals who interact with us and how we handle that information both internally and on our website.

## Personal Information as Defined by PIPEDA

Personal information is defined by PIPEDA as “information about an identifiable individual that includes any factual or subjective information, record or not, in any form.” For example the following would be considered personal information:

- Name, address, telephone number, gender
- Identification numbers, income or blood type
- Credit records, loan records, and existence of a dispute between a consumer and a merchant, and intention to acquire goods or services

The legislation also covers “sensitive personal information”, which may include health or medical history, racial or ethnic origin, political opinions, religious beliefs, trade union membership, financial information and sexual preferences. Under PIPEDA, personal information does not include the name business title, business address, or business telephone of any employee, i.e. information on a business card.

Employment Records are not covered by PIPEDA unless the employer operates a federal work, undertaking or business (subject to Canada Labor code). As such, OLTCA’s Privacy Policy and Practices will not apply to personal information collected from its employees in the course of their employment with OLTCA.

## Types of Information We Collect

With your consent, we may gather personal information from you over the telephone, by correspondence with you via mail or on the internet through OLTCA’s website. In general, you can visit our public area of the website without telling us who you are or revealing any personal information about yourself.

If you wish to participate in any of OLTCA education events or access any of our services we may require business and/or personal information from you. Some of the services OLTCA offers includes on-line registration for education events; the Administrator Certification Program; Personal Support Worker Pin Program; and subscriptions to our national publication *Long Term Care Magazine*.

The type of information we may collect about you depends on the service you request. The information we may collect includes your name, contact information, information to purchase goods and services (i.e. credit card information), and record of academic and professional accomplishments and employment history.

### **How we use your personal information**

Typically, personal information collected is used by OLTCOA to confirm your identity; to communicate with you; to respond to your inquiries; and, generally to provide you with the goods and services requested. Specifically, the purposes for which OLTCOA would normally be collecting an individual's personal information include:

- Administrator certification
- OLTCOA Awards and Bursaries
- Long Term Care Magazine
- Member records and communications
- Speakers/presenters for OLTCOA events
- On-Line registration
- Elected representatives contact information
- Surveys and data collection
- Personal Support Worker pins

### **Sharing of Personal Information**

From time to time OLTCOA will share the personal information of individuals requesting specific services as it is identified as part of the service and with signed consent.

### **Your Consent**

As stipulated by PIPEDA, OLTCOA will not collect or use personal information without first obtaining an individual's consent. Please note that, in some cases, your choice to refuse or withdraw consent to certain collection, use or disclosure of personal information may impact on your ability to meet requirements of the services for which you have applied.

PIPEDA allows for the collection, use and disclosure of an individual's personal information without consent in certain specific circumstances. For example, an individual's consent is not required when legal, medical or security reasons make it impossible or impractical to obtain the consent or where it is in the best interests of the individual. Under these specific circumstances, OLTCOA will not obtain an individual's consent to disclose information.

## **Retention of Personal Information**

OLTCA will destroy, erase or render anonymous personal information no longer required for the stated purposes or for a legal or legitimate business requirement.

## **Security Safeguards**

We have security safeguards in place designed to protect against loss, theft, unauthorized access, disclosure, copying, use or modification of an individual's personal information that is in our care. The nature of the safeguards depends of the sensitivity, format, location and storage of the information. You should be aware that e-mail is not a 100% secure medium and you should take this into consideration when contacting us or sending us personal or other confidential information by way of e-mail transmission.

## **Access and Correction of Personal information**

If you wish to request access to, or correction of, your personal information in OLTCA records, please make your request in writing to OLTCA's Privacy Officer by e-mail at [privacyofficer@oltca.com](mailto:privacyofficer@oltca.com)

OLTCA reserves the right to refuse an individual's request for access to their personal information if:

1. The personal information is protected by legal privilege;
2. Granting access to the individual's personal information would reveal confidential commercial information;
3. Doing so would reasonably be expected to threaten the life or security of another individual;
4. The personal information was collected for purposes related to the detection and prevention of fraud;
5. The personal information was generated in the course of a formal dispute resolution process;
6. The personal information would likely reveal personal information about another individual;
7. The request is vexatious or frivolous; or
8. To protect OLTCA's rights and property.

## **Changes to this Privacy Policy**

OLTCA reserves the right to change this Privacy Policy from time to time. If OLTCA makes a material change, this Privacy Policy will be updated accordingly. We recommend that you review this Privacy Policy periodically so that you are aware of any changes. Your continued use of our site following the posting of any changes to the Privacy Policy shall constitute your acceptance of these changes.

## **Inquiries, Questions, or Complaints**

If you have any inquiries, requests or complaints regarding OLTCA' s privacy practices, please contact OLTCA's Privacy Officer by phone at 905-470-8995 ext 27 or by e-mail at [privacyofficer@oltca.com](mailto:privacyofficer@oltca.com) This Privacy Statement was last modified on May 10, 2004.