

Friends of the Provincial Archives of Alberta Society Employee, Volunteer and Contractor Privacy Policy

The Friends of the Provincial Archives of Alberta Society is committed to safeguarding personal information entrusted to us by our employees, volunteers and contractors. We manage your personal information in accordance with Alberta's *Personal Information Protection Act* (PIPA) and other applicable laws. This policy outlines the principles and practices we follow in protecting your personal information.

This policy applies to the Friends of the Provincial Archives of Alberta Society and to any person providing services on our behalf.

PIPA defines an employee as an individual employed by an organization or who performs a service for organization, whether or not the individual is paid, and includes a volunteer, student, and contractor (an individual (not a company) who performs a service for the organization under a contract or is acting as an agent for the organization). A prospective employee is an individual who is being considered or may be considered for a position within the organization and includes a prospective volunteer, student or contractor.

PIPA has special rules for personal information of employees, volunteers and contractors. An organization may collect, use and disclose personal information of employees, volunteers and contractors without consent for reasonable purposes related to recruiting, managing or terminating personnel. These rules apply to personal information of prospective employees, volunteers and contractors also.

A copy of this policy is provided to any employee, volunteer or contractor on request.

What is personal employee information?

Personal information means information that can identify an individual (for example, name, home address, home phone number), and information about an individual (for example, physical description, education qualifications).

Personal employee information is personal information that is reasonably needed to establish, manage or terminate a work or a volunteer work relationship. For example, personal employee information may include: personal contact information (home address, telephone number), social insurance number, gender, date of birth, salary information, hours worked, absences, vacation dates, terms and conditions of employment, bank account information, resume, references and performance reviews.

PIPA does not apply to an employee's business contact information (name, title or position, business telephone number, address, fax number and e-mail address) when it is collected, used or disclosed for the purposes of contacting an individual in his or her capacity as an employee or an official of an organization. This allows an organization to routinely collect, use or disclose business contact information as part of its daily operations. For example, the President's name, title and contact information is posted on the Society's website as the person for people to contact if they want more information

about the Society. This is a disclosure of business contact information for the purpose of contacting individuals in their capacity as board members of the Society and the disclosure would not be subject to PIPA.

What personal employee information do we collect?

We only collect the personal employee information that we need for the recruitment, management or termination of employees, volunteers and contractors.

For example, the personal employee information we collect may include:

- personal contact information (home address, telephone number)
- social insurance number
- gender
- date of birth
- salary information
- hours worked, absences, vacation dates
- terms and conditions of employment
- bank account information
- resume and references
- performance reviews

We normally collect information directly from employees, volunteers and contractors. We may collect your information from other persons without your consent as permitted by PIPA.

We inform our employees, volunteers and contractors, before or at the time of collecting personal information, of the purposes for which we are collecting the information.

How do we use and disclose personal employee information?

We will only use or disclose your personal employee information for the purposes for which it was collected, unless otherwise as authorized by law.

For example, the purposes related to recruitment, management or terminating employees, volunteers and contractor may include:

- determining eligibility for employment or a volunteer work relationship, including the verification of references and qualifications
- administering pay and benefits
- processing employee work-related claims (e.g. workers' compensation, insurance claims, etc.)
- establishing training and/or development requirements
- performance reviews
- gathering evidence for disciplinary action, or termination
- complying with applicable laws (for example, Canada Income Tax Act, Alberta Employment Standards Code)
- Complying with requirements of funding organizations (for example, Alberta Gaming, Alberta Government's Summer Temporary Employment Program (STEP), Federal Government's Young Canada Works Program).

Further, your personal employee information may be disclosed:

- as permitted or required by applicable law or regulatory requirements.
- to comply with legal processes such as search warrants, subpoenas or court orders, and
- as part of the regular reporting activities (e.g. report on projects to members at the annual general meeting and grant agencies such as Alberta Gaming).

In all cases, we will not disclose more personal employee information than is required under the circumstances.

We share your personal employee information with our employees, contractors, consultants and other parties who require such information to assist us with administering our work or volunteer work relationship with you, including: third parties that provide services to us or on our behalf; third parties that collaborate with us in the provision of services to you; and, third parties whose services we use to perform our services.

We regularly transfer records (e.g. project proposals and reports) that may include personal employee information that are of enduring value to the Provincial Archives of Alberta for permanent preservation.

When do we request consent?

We may collect, use and disclose personal employee information about you without your consent if you are an employee, volunteer or contractor of the Society, or the collection of the information is for the purpose of recruiting a potential employee, volunteer or contractor.

We will only collect, use or disclose your personal employee information without your consent if the collection, use or disclosure is for a purpose reasonably related to the work or volunteer work relationship with the Society.

In the case of current employees, we will give reasonable notice that information is going to be collected, used or disclosed and of the purposes for the collection, use and disclosure of that information.

We will obtain an employee's, volunteer's or contractor's consent if we wish to collect, use or disclose personal information about the employee, volunteer or contractor for a purpose other than establishing, managing or terminating the work or volunteer work relationship between the Friends of the Provincial Archives of Alberta Society and the employee, volunteer or contractor and none of the provisions of PIPA allow for the collection, use and disclosure of personal information without consent apply. For example, a retail store at which an employee is seeking chequing privileges contacts the Society to confirm the employee is an employee of the Society. The Society cannot rely on the personal employee information provisions to disclose the information to the store as the disclosure is not for the purpose of managing the employment relationship. The Society will need the employee's consent to disclose the information.

How do we protect your personal employee information?

The Friends of the Provincial Archives of Alberta Society will maintain reasonable physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, copying, use, modification or disclosure.

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of your work or volunteer work relationship, please keep us informed of such changes.

In some circumstances we may not agree with your request to change your personal information and will instead append your request for correction to the record in question.

Except as otherwise permitted or required by applicable law or regulatory requirements, the Friends of the Provincial Archives of Alberta Society will retain your personal information only for as long as it believes is necessary to fulfill the purposes for which the personal information was collected or for legal or business purposes.

Access to records containing your personal information

Employees, volunteers or contractors of Friends of the Provincial Archives of Alberta Society have a right of access to their own personal employee information in a record that is in our custody or under our control, subject to some exceptions. For example, organizations are required under PIPA to refuse to provide access to information that would reveal personal information about another individual.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal employee information by writing to the President of the Society. You must provide sufficient information in your request to allow us to identify the personal employee information you are seeking.

You may also request information about our use of your personal employee information and any disclosure of that information to persons outside the Society. For personal employee information collected before January 2004, if we do not have a record of disclosures, we will provide information about any disclosure of your personal employee information that is likely to have occurred.

You may also request a correction of an error or omission in your personal employee information.

We will respond to your request within 45 calendar days, unless an extension is granted.

Questions

If you have a question or concern about any collection, use of disclosure of personal employee information by the Friends of the Provincial Archives of Alberta Society, please contact the President of the Society.

For the phone number of the current President, please contact the Provincial Archives of Alberta at 780-427-1750.

If you are not satisfied with the response you received, you may contact the Information and Privacy Commissioner of Alberta at 403-297-2728 or 1-888-878-4044.

*Approved by Board
April 27, 2009*