



POLICY NUMBER: OPPO.9009

EFFECTIVE DATE: MARCH 5, 2004

## PRIVACY POLICY

### 1. POLICY STATEMENT:

Indus Community Services (Indus) is committed to keeping your personal information accurate, confidential, secure and private. When you visit our website, contact us, participate in one of our programs or attend an event, or make a donation to support our activities, we are committed to protecting your privacy rights and your personal information.

Our privacy policy is based upon the Privacy Principles contained within the Canadian Standards Association (CSA) Model Privacy Code for the Protection of Personal Information and reflects the requirements of applicable legislation including the Freedom of Information and Protection of Privacy Act (FIPPA).

Personal information is defined as any factual or subjective information, recorded or not, about an identifiable individual. Examples are age, name, source of income, home addresses and telephone numbers. Personal information does not include the name, title, or business address or telephone number of an employee of an organization.

### 2. PURPOSE:

The purpose of this policy is to outline the principles that Indus will use to protect the privacy of your personal information in its possession. It addresses the reasons why such information is collected, how it is used, how it's confidentially protected and outlines your rights with respect to this information.

### 3. SCOPE:

The policy applies to our employees, volunteers, student placements, members, clients, community partners and donors.

### 4. PROCEDURE:

#### 4.1. Accountability

4.1.1. Indus is responsible for the protection of your personal information collected through our office(s), program activities and website. Individuals will be asked to review and sign a consent form before any personal information is released to third parties for the purpose of providing enhanced services or otherwise.

4.1.2. The CEO is designated as Indus' Privacy Officer, and has overall responsibility for the protection of personal information and for Indus' compliance with this Privacy Policy.

4.1.3. The Privacy Officer's Responsibilities include:

- i. Documentation of uses of personal information
- ii. Training employees in correct practices
- iii. Compliance monitoring
- iv. Reporting and dispute resolution

## **4.2. Identifying Purposes**

- 4.2.1. Indus will provide a statement to explain the purpose(s) for the collection of your Personal information wherever possible, before we ask you to disclose it.
- 4.2.2. We collect personal data when you make use of or register for our programs and services, in order to better meet your program, service and information needs.
- 4.2.3. We also use and disclose data, which does not identify individuals, for statistical purposes to assess, develop and improve our programs and services.
- 4.2.4. We also collect personal information in order to refer you to enhanced services, or to satisfy legal, government and regulatory obligations.
- 4.2.5. We do not sell personal information we collect.
- 4.2.6. We will not disclose your personal information to anyone else without your prior knowledge or consent, except when required by a government body or agency, or as permitted by law.
- 4.2.7. If you supply us with your contact information, you may hear from us about important information concerning the program or service for which you are registered.
- 4.2.8. You may also hear from us about other Indus programs and services that may interest and benefit you or we may ask you for feedback about the services you have already received as part of our quality assurance commitment. If you do not wish to receive information about other Indus programs, services or opportunities, please call (905) 275-2369.
- 4.2.9. Using our Website: You can access our website and browse our site without disclosing your personal data. Any personal information that site visitors voluntarily choose to provide in order to receive free electronic newsletters, participate in periodic polls and surveys and/or to complete any of our online application forms IS NOT shared with third parties unless stated otherwise. Indus will ensure all personal information is secured and remains confidential.
- 4.2.10. Indus' Use of Cookies: A cookie is a small text file containing a unique identification number that is transferred from a website to the hard drive of your computer so that the website may identify separate visitors to the site and track users' activities on the website. A cookie will not let a website know any personally identifiable information about you, such as your real name and address. Indus uses cookies only to keep track of how many people visited our website and how frequently each page is visited. Each individual movement of any user cannot be tracked while on Indus' site. Cookies are only used to track page popularity for statistical purposes and to improve the quality of the site and meet your needs. (For more information on cookies, please check your browser's settings.)
- 4.2.11. Links on our Website: Indus wants your website experience to be informational and resourceful; therefore our website also provides a number of links to third party sites. Indus assumes no responsibility for the information practices of sites you are able to access through our site. We encourage you to review each site's privacy policy before disclosing any personally identifiable information.

## **4.3. Consent & Disclosure**

- 4.3.1. The only personal information that Indus collects is with your knowledge and consent. You can choose not to disclose any personal information we may ask you to provide. However, a decision to withhold some personal information can result in our inability to

provide you with our services. Additionally, you can withdraw your consent to the collection, use or disclosure of your personal information at any time, subject to any legal requirements and reasonable notice.

#### **4.4. Collection of Personal Health Information**

4.4.1. Indus collects personal health information about the client directly from the client, or from the personal acting on behalf of the client in compliance with the Personal Health Information Protection Act (PHIPA).

4.4.2. The personal health information that we collect may include, the clients name, date of birth, address, health history, records of visits and other interactions with Indus. Occasionally, we collect personal health information about the client from other sources where we have obtained the client's consent to do so or where the law permits.

4.4.3. Indus uses and discloses your personal health information to:

- i. Treat and care for the client;
- ii. Plan, administer and manage our internal operations;
- iii. Conduct risk management and quality improvement activities;
- iv. Compile statistics;
- v. Comply with legal and regulatory requirements; and
- vi. Fulfill other purposes permitted or required by law.

4.4.4. Under Ontario law clients have every right to:

- i. Know how we collect, use, disclose and store your personal health information.
- ii. Expect that any of your personal health information held by us remains accurate, confidential and secure.
- iii. Expect that your personal health information remains private. We will **not** share personal information with others without your consent unless we are permitted or required to by law.
- iv. Look at or receive a copy of your personal health information and ask us to correct your personal health information record. Kindly make these requests in writing to Indus (Request for Information Form # GFO.9022).
- v. Ask questions or make a complaint to our Privacy Officer about our privacy practices.
- vi. Withdraw your consent (if the law allows) for some of the above uses and disclosures by contacting us in writing.

#### **4.5. Limiting Collection**

4.5.1. The amount and type of information that Indus collects is limited only to that which is necessary to fulfill the purposes identified. Indus will ask for the information it requires directly from the individual. Personal information will be collected using procedures which are fair, transparent and lawful. You can choose to disclose as much or as little personal information as you are comfortable with. As noted in Principle 4.3, a decision to withhold some personal information can prevent us from providing you with our services.

## **4.6. Limiting Use, Disclosure and Retention**

4.6.1. Indus will use your personal information only for the purposes for which it was collected. Your information will not be disclosed without your knowledge and consent, unless permitted or required by law. Your personal information will be retained only as long as necessary to fulfill the purposes for which it was collected, and in compliance with any laws surrounding information retention. If all identified purposes for the use of your personal information have been exhausted, we will destroy the information or render it unidentifiable.

## **4.7. Accuracy**

4.7.1. In order to ensure the reliable delivery of services and information, your personal information will be kept accurate, complete and up to date. We assume that the information that you provide to us is accurate. If at any time your personal information changes, we hope to be informed of it immediately. If you contact us with a written request, we will take appropriate steps to update or correct the personal information in our possession that you have previously provided to us.

## **4.8. Safeguards**

4.8.1. Indus employs a number of safeguards to protect your personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Such safeguards include physical measures, for example locked filing cabinets, restricted access to offices, and limiting access on a “need to know” basis, and use of passwords and encryption.

## **4.9. Openness**

4.9.1. Indus has easily understandable and readily available specific information about its policies relating to the management of personal information. Our policy is available at all times on our website, [www.induscs.ca](http://www.induscs.ca), under the section: “About Us”, and click on “Policies”.

## **4.10. Individual Access**

4.10.1. Upon request, we will inform you if we hold any personal information about you and provide you with access to this information. If we have any personal information about you, we will also tell you for what purposes it is used for, if applicable. You have a right to update any personal information that we hold on you. Should you wish to see the full contents of your information that is on file, you must make a formal written request (Request for Information Form # GFO.9022) to the Privacy Officer.

4.10.2. We will respond to you within thirty (30) days after receipt of your written request or will notify you if a longer period is required by us in order to fully address your request, provided that an extension of thirty (30) day period is permitted by applicable privacy laws.

## **4.11. Challenging Compliance**

4.11.1. If, for any reason, you are concerned about our compliance with our Privacy Policy, you may contact our Privacy Officer in writing, by mail or by email.

4.11.2. Indus has policies and procedures to receive, investigate and respond to individuals' complaints and questions. If you are not satisfied with the way Indus has responded to a complaint, you can contact the Privacy Commissioner of Canada. This Privacy Policy may be updated from time to time and will be posted on our website.

#### 4.12. Contact Information for the Privacy Officer:

Gurpreet S. Malhotra, CEO  
Privacy Officer  
Indus Community Services  
3038 Hurontario St., Suite 206, Mississauga, ON, L5B 3B9  
Email: [privacy@induscs.ca](mailto:privacy@induscs.ca)

#### 5. RESPONSIBILITY:

- 5.1. It is the responsibility of all personnel within Indus to adhere to this policy. Failure to do so may result in disciplinary action which if deemed appropriate by the CEO may include further action up to and including termination.
- 5.2. Direct Supervisors are responsible for ensuring that all personnel are properly oriented regarding this policy.
- 5.3. Human Resources will ensure that this policy remains current with respect to any changes to legislation and will notify the CEO of such changes to ensure that this policy and any related forms are revised to reflect current and applicable legislation.

#### 6. DEFINITIONS:

- 6.1. “**Personnel**” for the purposes of this policy refers to all Indus employees, purchase of service contractors, student placements, volunteers (including Board Members) and other third parties who deal with the public on behalf Indus.

#### 7. REFERENCES:

- 7.1. Consent to Share Information Form # GFO.9021
- 7.2. Request for Information Form # GFO.9022
- 7.3. Confidentiality Policy # HRPO.9015
- 7.4. Statement of Confidentiality Form # HRFO.9004
- 7.5. Client Privacy & Information Disclosure Policy # OPPO.9008
- 7.6. Freedom of Information and Protection of Privacy Act (FIPPA)
- 7.7. Personal Health Information Protection Act (PHIPA)
- 7.8. Personal Information Protection and Electronic Documents Act (PIPEDA)

#### *Policy Approvals*

<b>Date</b>	<b>Approved by</b>
June 20 <sup>th</sup> , 2018	Vinitha Miranda, Director
June 25 <sup>th</sup> , 2018	Gurpreet S. Malhotra, CEO