

ONTARIO ASSOCIATION OF COMMUNITY FUTURES DEVELOPMENT CORPORATIONS INC. (OACFDC)

PRIVACY STATEMENT

INTRODUCTION

The Ontario Association of Community Futures Development Corporations Inc. (OACFDC) is not-for-profit provincial organization with a volunteer Board of Directors and professional staff whose purpose is to support and provide services to its membership to improve capacity, efficiency and effectiveness.

This brochure summarizes the OACFDC's privacy policies and procedures that have been developed to comply with Canada's *Personal Information Protection and Electronic Documents Act* ("*PIPEDA*"). *PIPEDA* sets out rules for the collection, use and disclosure of a client's or customer's personal information, as well as safeguarding that information in the course of commercial activity as defined in the legislation.

WHAT IS "PERSONAL INFORMATION"

Under *PIPEDA*, "Personal Information" means any information that is identifiable to an individual, including name, address, telephone number, Social Insurance Number, and date of birth. It also includes, but is not limited to, other information relating to identity, such as, nationality, gender, marital status, financial information and credit history.

PURPOSES FOR PERSONAL INFORMATION

The OACFDC collects only that personal information required to verify information from third parties such as financial institutions or insurance companies or report to Industry Canada, the federal department that administers the Ontario Community Futures Program.

CONSENT

At the time of completing an application, the express, written consent of the individual applicant will be sought for the collection, use, retention and disclosure of their personal information for the purposes set out in OACFDC's privacy policy.

An applicant may choose not to provide some or all of the personal information requested, but if OACFDC is unable to collect sufficient information to validate a request, the application may be turned down.

ACCURACY

The OACFDC endeavours to ensure that all personal information in active files is accurate, current and complete. When a client notifies OACFDC that his or her personal information requires correction or updating, the necessary changes will be made. Information contained in closed files is not updated.

LIMITING USE, RETENTION & DISCLOSURE

The OACFDC uses and retains personal information for only those purposes to which the individual has consented.

Personal information will be disclosed to only those OACFDC employees, volunteer members of committees and/or Board of Directors that need to know the information for the purposes set out in the OACFDC Privacy Policy.

SAFEGUARDS

The OACFDC utilizes a number of physical, organizational and technological measures to safeguard personal information from unauthorized access or inadvertent disclosure in accordance with its *Information Security Policy, and Record Retention and Destruction Policy*, including but not limited to:

Physical

Active files are stored in locked filing cabinets located in work areas restricted to OACFDC employees and authorized volunteers. Closed files are stored in locked cabinets for a period of seven years, after which, the information is shredded prior to disposal.

Organizational

OACFDC employees, volunteers, and third party service providers sign confidentiality agreements binding them to safeguarding the confidentiality of personal information to which they have access.

Technological

Personal information contained on OACFDC computers and the electronic database are password protected. As well, the Internet server or router has firewall protection to protect against virus attacks and hacking into the database.

Electronic Transmission of Information

Notwithstanding the technological safeguards implemented by the OACFDC, all Internet transmissions are susceptible to possible loss, misrouting, interception and misuse. For this reason, as part of the application that individual's sign consenting to their personal information being collected, used, retained, and disclosed, OACFDC will assume that it has the individual's consent to communicate via the Internet unless notified to the contrary.

INDIVIDUAL ACCESS

An individual, who wishes to review or verify what personal information is held by the OACFDC, may do so by making a request, in writing to the OACFDC's Chief Privacy Officer. Upon verification of the individual's identity, the Chief Privacy Office will provide a written report within 60 days.

INVESTIGATING COMPLAINTS

Any concern or issue about OACFDC's personal information handling practises may be made, in writing, to the Chief Privacy Officer. Upon verification of the individual's identity, the Chief Privacy Officer will act promptly to investigate the complaint and provide a written report to the individual.

If the individual is dissatisfied with the report provided by the Chief Privacy Officer, or feels that the corrective action taken by OACFDC is insufficient, the individual may direct a complaint to the Federal Privacy Commissioner in writing. The address of the Federal Privacy Commissioner is provided in this Privacy Statement for your convenience.

AMENDMENTS TO OUR PRIVACY POLICY

This Privacy Statement is a summary of OACFDC's Privacy Policy. For full particulars of OACFDC's privacy policies and procedures, please request a copy of the Privacy Policy from OACFDC or a copy may be obtained from the Internet website at: www.ontcfdc.com.

The OACFDC Privacy Policy and this Privacy Statement are in effect May 10, 2004 and are retroactive to January 1, 2004. The OACFDC's Privacy Policy and this Privacy Statement may be updated from time to time to reflect amendments in applicable Federal and Provincial laws. Any changes to this Privacy Policy will be posted on OACFDC website and will apply to personal information collected from the date of the posting of the revised Privacy Policy.

CONTACT INFORMATION

If you have any questions regarding OACFDC's Privacy Policy, Information Security, Retention and Destruction Policy, and/or this Privacy Statement, or you wish to make an access to personal information request, please contact:

Chief Privacy Officer: Diana Jedig
Ontario Association of Community Futures Development Corporations Inc.
300 South Edgeware Road,
St. Thomas, Ontario N5P 4L1
Email: djedig@oacfdc.com
Phone: (888) 633-2326
Facsimile: (519) 633-3563

OTHER HELPFUL PRIVACY LINKS

For a copy of *PIPEDA*, or for answers to other questions regarding privacy legislation, below are some helpful privacy links.

Federal Privacy Commissioner
www.privcom.gc.ca
112 Kent Street
Ottawa, ON K1A 1H3

Provincial Privacy Commissioner
www.privcom.on.ca

Ontario Association of Community Futures Development Corporations Inc. Privacy Policy Web Site: www.ontcfdc.com

Siskind, Cromarty, Ivey & Dowler LLP
Privacy Law Group:
www.siskindsprivacylaw.com