

<b>PRIVACY POLICY</b>	
FILE UNDER SECTION: <b>ADMINISTRATION</b>	EFFECTIVE: January 18, 2005
SUB-SECTION: <b>POLICIES &amp; PROCEDURES</b>	REVISED:
<b>APPROVED</b>	

The privacy of personal information is an important principle to Independent Living Services of Simcoe County and Area. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services and products that we provide. We are committed to incorporating the following principles into our collection and use of personal information: accountability; identified purpose; consent; limiting collection, use, disclosure and retention; accuracy; incorporating safeguards; openness; individual access and opportunities to challenge compliance. This policy applies to all ILS employees, volunteers and contracted groups and individuals authorized to use, collect or disclose personal information working in any of our offices or under our supervision.

**Background Information**

Personal information is information about an identifiable individual that includes their personal characteristics such as age, gender, income, address, telephone number, family status, ethnicity, health conditions, health services received, religion, opinion, or evaluation. Business information is not considered personal information and is not protected by privacy legislation. Example: An individual’s business address and telephone number.

Independent Living Services will apply the privacy principles as follows:

**1. Accountability**

Independent Living Services is responsible for the personal information that is collected and maintained for its operations. Independent Living Services have taken the following measures to ensure compliance with the Privacy Policy:

- a) ILS has designated a Privacy Officer to oversee the organizations day-to- day compliance with the Privacy Policy.
- b) Established a Privacy Steering Committee to assist with ongoing evaluation and development.
- c) Developed procedures to protect personal information.
- d) Developed procedures to receive and respond to complaints and inquiries.
- e) Distributed information and trained staff and volunteers about our policies respecting personal information.

**2. Identifying Purposes**

Independent Living Services will identify orally, electronically, or in writing, the purposes for which personal information is collected at or before the time the information is collected.

### **3. Consent**

ILS will ensure that individuals are aware of how their personal information is used. An individual may withdraw consent at any time, subject to contractual restrictions and reasonable notice.

Note: In certain circumstances, personal information can be collected, used or disclosed without the knowledge and consent of individuals. For example, seeking consent may be impossible or impractical for legal, medical, or security reasons.

### **4. Limiting Collection**

ILS limits the collection of personal information to that which is necessary for the purposes previously identified and for no other purposes. ILS will collect information by fair, open, and lawful means.

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

ILS will not use personal information for purposes other than those for which it was originally collected, unless it has first obtained the consent of the person from whom such information was received or of required to do so by law. Personal information is retained only for as long as it is needed and only for the fulfillment of the purposes for which it was originally collected or as required by law.

ILS will destroy, erase, or make anonymous any personal information that is no longer necessary for the identified purposes or required to be retained by law. ILS will maintain controls, schedules, and practices for the retention and destruction of personal information.

### **6. Accuracy**

ILS will maintain accurate, complete and up to date personal information as necessary for the identified purposes. At the individual's request, we will take appropriate steps to update or correct personal information in our possession. Requests for corrections need to be made in writing.

### **7. Safeguards**

ILS protects personal information using physical, electronic or procedural security measures that are appropriate to the sensitivity of the information in custody or control. Safeguards are in place to protect personal information from theft, loss, unauthorized access, disclosure, copying, or modification. ILS will verify the individual's identity before searching for or providing personal information.

### **8. Openness**

ILS will make available to individuals specific information about its policies and management of personal health information in its control and custody. The Association's privacy policy will be made available to the public.

### **9. Individual Access**

Requests to access or to correct your personal information records are to be made to the Manager of the relevant program.

### **10. Inquiries or Concerns**

You may contact the Privacy Officer at Independent Living Services, 1102-44 Cedar Pointe Drive, Barrie, ON, L4N 5R7.