

THE CORPORATION OF THE NATION MUNICIPALITY

PRIVACY POLICY

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PRIVACY POLICY

OUR COMMITMENT TO PRIVACY

Protecting the privacy and confidentiality of personal information is an important aspect of the way The Nation Municipality conducts its business. Collecting, using, and disclosing personal information in an appropriate, responsible, and ethical manner is fundamental to The Nation's daily operations.

The Nation strives to protect and respect personal information of its customers, employees and business partners, in accordance with all applicable provincial and federal laws. Each staff member of The Nation must abide by these procedures and practices when handling personal information.

APPLICABILITY

This Privacy Policy informs of The Nation's commitment to privacy and establishes the methods by which privacy is ensured. This Privacy Policy applies to all personal information within The Nation's possession and control.

DEFINITIONS

"Personal information" is defined as any identifying information about an individual or group of individuals, including name, date of birth, address, phone number, e-mail address, social insurance/security number, nationality, gender, health history, financial data, credit card numbers, bank account numbers, assets, debts, liabilities, payment records, credit records, loan records, opinions, and personal views.

"Business information" is defined as business name, business address, and business telephone number, name of owner, executive officer, and director, job titles, business registration numbers, and financial status. Business information is treated and handled with the same level of confidentiality, privacy, and respect as personal information.

"Consent" occurs and is obtained when an individual signs an application or other form containing personal information, thereby authorizing The Nation to collect, use, and disclose the individual's personal information for the purposes stated on the form or in the Appropriate Use section of this policy.

- Implied consent is granted by the individual when he/she signs the application or form. This allows The Nation to obtain or verify information from third parties (such as banks, credit bureaus, lenders, or insurance companies) in the process of assessing the eligibility of an individual, customer, client, job applicant, or business partner.

APPROPRIATE USE

The Nation collects and uses personal information solely for the purpose of conducting business and developing an understanding of its customers. The Nation hereby asserts that personal information will only be used for the following purposes:

1. Employment applications
2. Municipal Freedom of Information and Protection of Privacy Act
3. By-Law enforcement
4. Municipal taxes payment plans
5. Building permits
6. Planning and zoning applications
7. Administrative purposes

POLICY STATEMENTS

1. The Nation assumes full accountability for the personal information within its possession and control. This organization has appointed the Chief Administrative Officer/Clerk as custodian of all privacy matters and legal compliance with privacy laws.
2. The Nation obtains personal information directly from the individual to which the information belongs. Individuals are entitled to know how The Nation uses personal information and this organization will limit the use of any personal information collected only to what is needed for those stated purposes. The Nation will obtain individual consent if personal information is to be used for any other purpose. The Nation will not use that information without the consent of the individual.
3. Under no circumstances will The Nation sell, distribute, or otherwise disclose personal information or contact lists to third parties. However, limited disclosure may be required as part of The Nation fulfilling its stated business duties and day-to-day operations. This may include consultants, suppliers, or business partners of The Nation, but only with the understanding that these parties obey and abide by this Privacy Policy, to the extent necessary of fulfilling their own business duties and day-to-day operations.
4. The Nation will retain personal information only for the duration it is needed for conducting business. Once personal information is no longer required, it will be destroyed in a safe and secure manner. However, certain laws may require that certain personal information be kept for a specified amount of time. Where this is the case, the law will supersede this policy.
5. The Nation vows to protect personal information with the appropriate security measures, physical safeguards, and electronic precautions. The Nation maintains

personal information through a combination of paper and electronic files. Where required by law or disaster recovery/business continuity policies, older records may be stored in a secure, offsite location.

- Access to personal information will be authorized only for the employees and other agents of The Nation who require the information to perform their job duties, and to those otherwise authorized by law.
 - The Nation's computer and network systems are secured by complex passwords. Only authorized individuals may access secure systems and databases.
 - Active files are kept in locked filing cabinets.
 - Routers and servers connected to the Internet are protected by a firewall, and are further protected from virus attacks or "snooping" by software solutions.
6. Most of the information accessible on The Nation's website does not require you to identify yourself. You may access it anonymously. However, personal information is collected when you choose to provide it. We collect only as much personal information as is absolutely necessary to assist you in conducting business via www.nationmun.ca.

Collection of Personal Information via Online Communications

We collect and retain personal information for the following purposes:

- To process your requests for services or further information
- To communicate with you regarding services that you have requested
- To identify you if you have a query or concern about the service that you have requested
- To advise you about changes to our web service offerings and of service interruptions
- To meet legal and regulatory requirements

From time-to-time our site may request information from you via polls and surveys. Participation in these polls and surveys is completely voluntary and you have a choice of whether or not to disclose the information requested. Survey information will be used solely for the purposes of monitoring and/or improving the use and satisfaction of this site. If you choose not to participate in surveys, you will still be able to use our site or request services or products from us.

7. Pursuant to section 36 of the *Municipal Freedom of Information and Protection of Privacy Act*, an individual has the right to access his/her personal information in custody of or under the control of The Nation, and is entitled to request a correction of his/her personal information if there is an error or omission. An individual seeking

access to his or her personal information shall fill out an “Access or Correction Request Form”. The form is available on the municipality’s website at www.nationmun.ca and at The Nation’s head office located at 958 Route 500 West in Casselman. The form, along with the \$5 payment, must be sent to Josée Brizard, CAO/Clerk at The Nation Municipality – 958 Route 500 West, Casselman, ON K0A 1M0.

8. The Nation may use personal information without the individual’s consent under particular circumstances. These situations include, but are not limited to:
 - The Nation is under obligation by law to disclose personal information in order to adhere to the requirements of an investigation of a local, regional or federal contravention, under the purview of the appropriate authorities.
 - An emergency exists that threatens an individual’s life, health, or personal security.
 - The personal information is for in-house statistical study or research.
 - The personal information is already publicly available.
 - Disclosure is required to investigate a breach of contract.

9. In addition to the specific statements contained within this policy, The Nation ensures that, in using personal information, they are familiar with and their conduct is in keeping with existing policies, including:
 - Social Media Policy
 - Facebook disclaimer
 - Municipal Freedom of Information and Protection of Privacy Act

CONCLUSION

Any questions or concerns regarding this Privacy Policy can be addressed by contacting us by phone at 613-764-5444, fax number 613-764-3310, e-mail jbrizard@nationmun.ca or website www.nationmun.ca. The Nation will investigate and respond to concerns about any aspect of the handling of personal information and will address concerns to the best of its abilities.