## PROTECTION OF PERSONAL INFORMATION

[Organization Name] is committed to upholding the privacy of employee private and identifiable information. This policy is based on the commitment to privacy that is outlined in Alberta’s [Personal Information Protection Act](https://www.qp.alberta.ca/documents/Acts/P06P5.pdf) (PIPA). [Organization Name] will uphold its responsibilities to protect private information.

DEFINITIONS

The following definitions were taken directly from the Personal Information Protection Act (PIPA):

“Personal Employee Information” means, in respect of an individual who is a potential, current or former employee of an organization, personal information reasonably required by the organization for the purposes of:

* establishing, managing, or terminating and employment of volunteer-work relationship, or
* Managing a post-employment or post-volunteer-work relationship between the organization and the individual but does not include personal information about the individual that is unrelated to that relationship.

“Personal information” means information about an identifiable individual.

POLICY

[Organization Name] is obligated to ensure that it protects any personal information that it collects, uses, or has been disclosed to it, no matter the source of the information (e.g., customers, employees, or other people).

Personal information includes:

* Name, sex, age, weight, height
* Home address and phone number
* Race, ethnic origin, sexual orientation
* Medical information
* Income, purchases, and spending habits
* Blood type, DNA code, fingerprints
* Marital or family status
* Religion
* Education
* Employment information

We will protect employee privacy based on the Ten Principles of Privacy Protection (also known as the Fair Information Practices):

1. Be accountable
2. Identify the purpose
3. Obtain consent
4. Limit collection
5. Limit use, disclosure and retention
6. Be accurate
7. Use appropriate safeguards
8. Be open
9. Give individuals access
10. Provide recourse

[Organization Name] will ensure that any private employee information that is collected adheres to the principles outlined below and considers how a reasonable person would achieve these principles:

**Be accountable**: [Organization Name] is responsible for all employee personal information under its control. Further, [Organization Name] will develop and implement policies and practices for handling all personal information, as well as a process for handling privacy complaints.

**Identify the purpose(s)**: [Organization Name] will always identify to employees why their personal information is being collected. As well, [Organization Name] will only collect the personal information required to fulfill that purpose with no additional information. The organization will also inform any person from whom it collects information why the information is required and how it will be used.

**Obtain consent**: Employee consent is required for the collection, use, or disclosure of employee information. If additional personal information is required, [Organization Name] will request additional consent from employees.

**Limit collection**: [Organization Name] will only collect the personal employee information that is required for the administration of pay, benefits, and other human resource activities. This information will always be collected in fair and legal ways and, whenever possible, will only be collected from the employee to whom it pertains and no other source.

**Limit use, disclosure, and retention**: Unless required by law, all private employee information collected by [Organization Name] will only be used for the purposes for which it was collected. Private employee information will only be retained for as long as is necessary to serve the purposes for which it was collected. If personal information is used to make a decision, this information will be retained for one year following the decision to provide the employee the chance to access it. As soon as the personal information is no longer required for business or legislative purposes, it will be destroyed, erased, or made anonymous.

**Be accurate**: [Organization Name] will maintain personal employee information as accurate, complete, and as up to date as possible. [Organization Name] may request periodic updates from its employees to ensure that the information on file is accurate.

**Use appropriate safeguards**: [Organization Name] will protect any personal employee information it has collected, no matter the format, by (Insert methods to maintain personal information, such as: locked filing cabinets, locked offices, encrypted drives, or any other means) to ensure the privacy of the information. Only specified persons, including (Insert titles) will have access to the information.

**Be open**: [Organization Name] will disclose its purposes for the collection of employee information and will have this information available upon request from employees. Upon request, [Organization Name] will provide the name of its privacy contact and contact information. [Organization Name] will also inform its employees how they can make a request to view their personal files and how to make a privacy complaint, as necessary.

**Give individuals access**: Employees of [Organization Name] have the right to view what personal employee information has been retained. Access to their own information will be provided within a minimum of 30 days. Further, employees may challenge the accuracy of this information and make modifications to the information, as necessary. If for any reason, [Organization Name] needs to refuse a request, this response will also be provided within 30 days, and it will include information on making a privacy complaint to the Information and Privacy Commissioner.

**Provide recourse**: [Organization Name] will meet or exceed the principles established by the Act. All complaints concerning the privacy of employee information will be investigated. If [Organization Name] becomes aware that it needs to correct its personal information practices, it will remedy its practices as soon as possible.

Employees are welcome to bring forward ways in which [Organization Name] could improve the safety of personal employee information; employees should contact management with their suggestions, recommendations, or complaints.