

University Settlement Employee Handbook			
Subject:	PRIVACY POLICY	Page:	1 of 3
Issued:	Nov 1, 2008	Effective:	Nov 1, 2008

Our Agency is dedicated to maintaining the highest standards of confidentiality with respect to all employee personal information provided to us. We are committed to ensuring that our handling of personal information is in compliance with applicable privacy legislation including the Personal Information Protection and Electronic Documents Act.

We have developed this policy and related procedures to comply with the Personal Information Protection and Electronic Documents Act.

What Is Personal Information?—"Personal Information" is personal information about an identifiable individual or information that allows an individual to be identified. Personal Information includes information such as address, gender, age, ID numbers, income, ethnic origin, credit records or medical records. Generally speaking Personal Information does not include what is considered business contact information: your name, title or position, business address, business telephone or facsimile number.

Objectives of the Privacy Policy: University Settlement is responsible for the Personal Information it holds or has under its control, including Personal Information it passes on to others. We have designated a Privacy Officer to ensure our compliance with legislation and this policy. Our Privacy Officer will receive and respond to your inquiries and complaints regarding the protection and privacy of your Personal Information, and deal with requests for access to your information.

Our Privacy Officer is the Senior Director of Administration and Finance.

Purposes for the Collection of Personal Information: The purposes for which Personal Information is collected by University Settlement is, in part, specified below:

- to enrol the employee on the payroll and benefits systems;
- to comply with requirements imposed by law;
- to comply with statutory obligations including tax withholdings and remittances for Canada Pension Plan and Employment Insurance;
- to administer the various programs and services we provide;
- to comply with our obligations under our collective agreement;
- in order to obtain funding and to meet our obligations to our funders.

Any change of purpose to any of the above will be communicated to you. Where appropriate, Personal Information will be obtained directly from you. In the event Personal Information is obtained from any other source, you will be notified or your authorization will be obtained.

University Settlement Employee Handbook			
Subject:	PRIVACY POLICY	Page:	2 of 3
Issued:	Nov 1, 2008	Effective:	Nov 1, 2008

Consent to Collection, Use and Disclosure of Personal Information: BY SUBMITTING PERSONAL INFORMATION TO THE AGENCY OR ITS SERVICE PROVIDERS AND AGENTS, YOU AGREE THAT WE MAY COLLECT, USE AND DISCLOSE SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND AS PERMITTED OR REQUIRED BY LAW. Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting the Privacy Officer. If you refuse to consent or withdraw your consent, we may not be able to provide you or continue to provide you with certain employment benefits.

There are circumstances where collection, use or disclosure may be justified or permitted, or where we are obliged to disclose Personal Information without your consent. These circumstances could include:

- Where the information is publicly available
- Where we are required to do so by law or by order of a court or tribunal
- Where we believe, upon reasonable grounds, that there is an imminent risk to an identifiable person or group of death or serious bodily harm
- Where it is alleged that an employee, officer, agent or director of University Settlement is guilty of a criminal offence, or is civilly liable in a legal action or guilty of certain misconduct

In such circumstances, we will not collect, use or disclose more Personal Information than is required.

Attached as Appendix A is the form of consent you will be requested to execute where applicable.

Storage, Security and Protection of Personal Information: University Settlement endeavours to maintain appropriate physical, procedural and technical security over our offices and information storage facilities so as to prevent any unauthorized access, disclosure, copying, use or modification of Personal Information. Your Personal Information may be stored in secured physical locations and on computer network servers controlled by University Settlement, located either at our offices or at the offices of our service providers. To help protect the confidentiality of your Personal Information, University Settlement employs physical, administrative and technological safeguards appropriate to the sensitivity of your Personal Information. For instance, we use secure computer data networks protected by industry standard firewalls and password protection systems. In addition, where Personal Information is sent to a third party for processing, we make sure, through our arrangements with them, that all Personal Information is kept secure. We only provide personal Information to third parties on an "as needed" basis and in accordance with the terms of this policy.

University Settlement Employee Handbook			
Subject:	PRIVACY POLICY	Page:	3 of 3
Issued:	Nov 1, 2008	Effective:	Nov 1, 2008

Retention of Personal Information: We will keep Personal Information only as long as it is necessary. When the Personal Information is no longer required, it will be destroyed to prevent unauthorized parties from gaining access to the information.

Access and Accuracy: Upon receiving a written request, and subject to any applicable exemptions, University Settlement will inform you of the current version of your Personal Information and will give you access to that information and the opportunity to correct any errors in it. Access requests should be sent to our Privacy Officer, using the contact information provided above.

Changes to the Privacy Policy: University Settlement reserves the right to modify or supplement this Privacy Policy at any time. If we make a change to this Privacy Policy, we will post such changes and, if requested, provide a physical copy to you.