

PDFFA Privacy Policy

Policy Number: PO 2022-03

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Preamble

This policy was created to conform with the Personal Information Protection Act (PIPA). It details how the Association safeguards the personal information of members and the manner in which the Association will handle inquiries for personal information or complaints regarding the use of personal information.

1. Use of Personal Information

- a. All personal information collected by the PDFFA shall be used only for the purposes of representing the PDFFA and its members, for the internal administration of the Association and for the purposes of furthering the goals of the PDFFA (including the investigation of issues, representations to the employer on behalf of a member(s), pursuing dispute resolution mechanisms, collective bargaining, assistance with medical leaves, etc.).
- b. Personal member information may include but is not limited to name, home address, phone number(s), and email address(es) which the Association may use for the distribution of Association information; to contact members for the purpose of conducting Association business and/or representation; and for matters necessary to the administration of the Association.

2. Disclosure of Personal Information

- a. Personal member information may be disclosed to employees and elected officials or agents (investigators, legal counsel, etc.) of the Association. These individuals shall be subject to the duty of confidentiality.
- b. Personal member information may be disclosed to the employer if such disclosure is necessary for the representation of a member and for the enforcement of the Collective Agreement.
- c. Personal member information will be disclosed to third parties, who are not the employer and are not the Association's employees, agents, or officials only with the specific consent of the member or where otherwise required by law.
- d. These regulations include, but are not limited to, all membership lists and survey data; the latter of which may only be analyzed and reported as summarized data that does not reveal personal member information.

3. Storage of personal information

- a. The Association is committed to safeguarding members' personal information whether it is in written, electronic, or other formats. The Association stores members' personal information in a number of venues:
 - i. PDFFA offices;
 - ii. personal possession of Union Executive, staff, and contractors
 - iii. on University of Alberta computer servers;
 - iv. off-site storage facilities rented by the Association.

- b. The storage of personal member information when in the possession of Association staff and officials shall occur only when necessary and shall be subject to the following:
 - i. ensuring the information is contained in a secure location if it is not in the immediate possession of the staff person or official;
 - ii. the information is not placed in such a manner as to provide accessibility to any party not entitled to such access;
 - iii. the information is kept in the possession of the staff person or official only so long as is necessary to deal with matters involving that information;
 - iv. upon no longer being necessary to retain personal member information in their possession, such information shall be brought to the Association office and placed in a file;
- c. Officials of the Union, who deal on an ongoing basis with such information which normally is not placed on files (e.g. handwritten notes of contacts, etc.,) shall, on a monthly basis review the member information they may possess and, if that information is not required to be retained by them, the information shall be placed in a general file and stored at the Association office.
- d. Personal member information shall be safeguarded by:
 - i. Placing all written, video, and audio records containing personal member information in files and stored in cabinets in offices which are to be locked outside of the normal business hours, or during such time where there are no employees or elected officials of the Association present.
 - ii. All computer records shall be stored on computers which are password protected and all such reasonable methods as may be possible shall be taken to safeguard those computer records.
- e. The Association recognizes that the ongoing retention of files may create issues with respect to the safeguarding of personal member information. As a result, retention of such information shall be governed by the following guidelines:
 - i. All files containing personal member information collected by Association staff or officials shall be destroyed after two years from the date the file was closed. Where it is reasonable to anticipate the information will be required past that time, the file will be retained for a further two years.
 - ii. Surplus computers will have the hard drive removed and destroyed.
 - iii. Destruction of files shall consist of shredding of all paper records and proper destruction of all audio and visual files.