



Halton Environmental Network Policy on Personal Information Protection and Privacy (“Privacy Policy”)

The Halton Environmental Network (“HEN”)’s relationships with stakeholders including community members, citizens, community organizations, donors, funding agencies, sponsors, applicants, volunteers and employees are highly valued. HEN is committed to the protection of stakeholder personal information and through Board approval, adheres to the following Privacy Principles (“Principles”) outlined herein. These Principles are based on the principles in Schedule I of the Personal Information Protection and Electronic Documents Act, S.C. 2000, c. 5 (the “Act”).

This policy relates to personal information, meaning information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization. The policy also applies to information related to organizations with relationships to HEN. It is recognized that the Act may not specifically apply to HEN, however, it is a sound document referenced to guide practice according to the Act’s principles.

Principle 1 – Accountability

HEN is responsible for all Personal Information under its control. Accountability for our compliance with the Principles rests with our Executive Director, even though other individuals within HEN may have responsibility for the day-to-day collection and processing of Personal Information. Information and may be delegated to act on behalf of the Executive Director.

We are responsible for Personal Information in our possession or control, including information that has been transferred to a third party for processing. We restrict the transfer of such Personal Information to third parties as much as is reasonably possible, and we use contractual or other means to provide a comparable level of protection while the information is being processed by a third party.

Principle 2 – Identifying Purposes

HEN will identify and document the purposes for collection, use or disclosure of Personal Information at or before the time of collection. Personal information will only be collected for purposes that are related to HEN’s work and that can be reasonably



considered to be appropriate for HEN. HEN collects, uses, and discloses Personal Information concerning donors, funding agencies and sponsors:

- To acknowledge their support
- To solicit their ongoing support
- To advise them of HEN's activities and about developments in the community which may be of interest.
- To publicize our grants and awards and their contributions to HEN.

Our funding agencies and sponsors may at any time "opt-out" of any disclosure of their Personal Information except as required by law. HEN collects, uses, and discloses Personal Information concerning community members, citizens, community organizations, job applicants, volunteers:

- To advise them of HEN's activities and about developments in the community which may be of interest
- To publicize our grants and awards
- To understand their goals and objectives
- To solicit their support and/or ongoing support
- To evaluate their eligibility/qualifications for volunteer or employment positions with HEN
- HEN collects, uses, and discloses Personal Information concerning our employees:
 - To manage our organization effectively
 - To establish and manage employee benefit programs
 - Personal Information is collected, used, and disclosed from all of our stakeholders to meet legal, statutory or regulatory requirements.

A reasonable effort will be made to specify the identified purposes, orally or in writing, to the individual from whom the Personal Information is collected either at the time of collection or after collection but before use. The identified purposes will be stated such that an individual can reasonably understand how the information will be used or disclosed.

If we plan to use or disclose Personal Information collected for a purpose not previously identified, this purpose will be identified and documented, orally or in writing, to the individual from whom the Personal Information has been collected, before such use or disclosure.

Principle 3 – Consent

Personal Information will only be collected, used, or disclosed with the knowledge and consent of the individual, except where inappropriate. HEN seeks express or implied consent through varying ways depending upon the information's sensitivity and the reasonable expectations of the individual. An individual can withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. HEN will inform individuals of any implications of withdrawing consent.

Typically, HEN seeks consent for the use or disclosure of information at the time of collection. In certain circumstances, consent may be sought after the information has been collected but before use (such as where we want to use information for a purpose not previously identified).

HEN will not, as a condition of the supply of services, require an individual to consent to the collection, use, or disclosure of Personal Information beyond that required to fulfil the explicitly specified and legitimate purposes. In certain circumstances, as permitted or required by law, HEN may collect, use or disclose Personal Information, without the knowledge or consent of the individual. These circumstances include: Personal Information is publicly available as defined by regulation; where collection or use is clearly in the interests of the individual and consent cannot be obtained in a timely way; to investigate a breach of an agreement or a contravention of a law; to act in respect to an emergency that threatens the life, health or security of an individual; for debt collection; or to comply with a subpoena, warrant or court order.

HEN confirms our policy to allow our donors and funding agencies and sponsors to opt-out, either initially or at any time thereafter, of any disclosure of their Personal Information.

Principle 4 – Limiting Collection

HEN will limit collection of the amount and type of Personal Information to that necessary for identified purposes. Collection will only be by fair and lawful means.

a) Links to/from External Sites:

HEN uses technologies, such as cookies, to customize content and advertising, and that provide social media features that enable analysis of traffic to our website.

Principle 5 – Limiting Use, Disclosure, and Retention

Personal Information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual, as required by law, or as outlined herein. Personal Information will be retained only as long as necessary to fulfil the identified purposes. Personal Information used to make a decision about an individual will be retained for a period of time long enough to allow the individual access to the information after the decision has been made and, in the event of an access request or a challenge, long enough to exhaust any recourse an individual may have under the law. Where Personal Information is no longer required to fulfil the identified purposes, it will be destroyed, erased, or made anonymous.

Principle 6— Accuracy

HEN will use best efforts to ensure that Personal Information is as accurate, complete, and up-to-date for the purposes of its use, including when used on an on-going basis, including information disclosed to third parties, and information used to make a decision about an individual.

Principle 7—Safeguards

HEN will protect Personal Information with safeguards appropriate to the sensitivity of the information. Safeguards will protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which the information is held. Employees are trained on the importance of maintaining the confidentiality of Personal Information.

Care is taken when Personal Information is disposed of or destroyed to prevent unauthorized parties from gaining access to the information. Our methods of protection include physical measures (for example, locked filing cabinets and restricted access to offices), organizational measures (for example, security clearances and limiting access on a “need-to-know” basis), and technological measures (for example, the use of passwords and encryption and secure data platforms and applications) .

Principle 8— Openness

HEN will make specific information about privacy policies and practices readily available, except when this is confidential organizational information.

The information made available will include:

- how an individual can gain access to their Personal Information;
- the type of Personal Information held including a general account of its use;
- documented privacy policies and practices;
- what Personal Information is made available to third parties and why; and
- how to contact HEN's Executive Director.

Principle 9—Individual Access

Following a written request with sufficient information, HEN will inform an individual of the existence, use, and disclosure of a person's Personal Information giving the individual access to that Personal Information. An individual can challenge the accuracy and completeness of their. Personal Information and have it amended as appropriate. Response to an individual's written request in an understandable form will be within a reasonable time (generally within 30 days). The individual's identity will need to be confirmed before providing access. Assistance with a request will be provided as requested. Where possible, we will indicate the source of the information.

Typically a response will be provided at no cost depending on the nature and amount of information involved, HEN reserves the right to impose a minimal cost. In these circumstances, the individual will be informed of the cost estimate. HEN will process the request upon payment. Information about the disclosure of Personal Information to third parties and/or organizations will be provided as specifically as possible. If inaccuracy or incompleteness of Personal Information is demonstrated, HEN will amend the information as required. Unresolved challenges will be recorded and if appropriate will be forwarded to relevant third parties and/or organizations.

In certain situations, HEN may refuse a request or be unable to provide access to all the Personal Information held about an individual. Exceptions to the access requirement will be limited and specific, as permitted or required by law. Where permitted, the reasons for denying access will be provided to the individual upon request. Exceptions may include: information containing references to other individuals or confidential commercial information, where the information cannot be severed from the record; information collected in the breach of agreement or formal dispute resolution processes; and information subject to solicitor-client privilege.



Principle 10 – Challenging Compliance

Any individual can challenge HEN's compliance with the organization's Privacy Policy. All written complaints will be investigated and if justified, HEN will take all appropriate measures, including, if necessary, amending our policies and practices.

Any questions or complaints can be directed via mail to: HEN, PO Box 60037 RPO Hopedale, Oakville, ON L6L 6R4 or via email: info@haltonenvironment.ca or to the Executive Director at: lisak@haltonenvironment.ca

If the issue is not resolved to your satisfaction, contact: The Privacy Commissioner of Canada 112 Kent Street, Ottawa, ON K1A 1H3

Principle 11 – Amendments

HEN will review and revise our Privacy Policy and practice periodically. Notice of any amendments will be posted on: <https://haltonenvironet.ca>, or in HEN's office, or in other appropriate HEN communications. Any changes will apply from the date of posting on our website. The current version of the Privacy Policy is available by request at HEN's office and is posted on HEN's website.

Principle 12 – Process and Procedures

Where a security breach of Personal Information has occurred, the following procedures are in place:

- HEN shall disclose to the individual any breach of security safeguards involving the individual's Personal Information under its control, if it is reasonable in the circumstances to believe that the breach creates a real risk of significant harm to the individual;
- The notification shall contain sufficient information to allow the individual to understand the significance to them of the breach and to take steps, if any are possible, to reduce the risk of harm that could result from the breach or to mitigate that harm;
- The notification shall be given as soon as possible after HEN determines that the breach has occurred;
- For the purposes of this principle, 'significant harm' includes bodily harm, humiliation, damage to reputation or relationships, loss of employment, business or professional opportunities, financial loss, identity theft, negative effects on the credit record and damage to or loss of property; and, HEN will assess whether



there is a real risk of significant harm to the individual with respect to, without limitation, (a) the sensitivity of the Personal Information involved in the breach, (b) the probability that the

- Personal Information has been, is being, or will be misused; and, (c) any other factor HEN may consider relevant.

POLICY AMENDMENT AND REVIEW

The Board of Directors may amend these policies at any time.

REVISION HISTORY

Approved: April 2021

Amendment Approved by Board of Directors March 2021