



Awareness. Understanding. Action.

Board Policy NB-005-2019	Presented to Board: July 5, 2019
Privacy Policy	Approved by Board: July 5, 2019
	<i>Last Reviewed by Board: DATE</i>
	<i>Revised by Board: DATE</i>

Purpose of Policy

This policy outlines how NIED stores, analyzes and/or shares personal information collected from or given to the organization by external and internal stakeholders. Business contact information is not covered by this policy, but rather by NIED’s *Human Resources Policy* (NB-02-2019).

Definitions

- **Personal information:** information about an identifiable individual, such as race; national or ethnic origin; religion; age; marital status; medical; education or employment history; financial information; DNA; internet protocol (IP) address; identifying numbers such as your social insurance number or driver’s licence; and views or opinions about an employee.

Policy

1. NIED adheres to the highest standards regarding the protection of personal information that may be under its control.
2. NIED shall take reasonable measures to use technology that is capable of safeguarding individual’s personal information against theft, loss, as well as unauthorized collection, use, disclosure, copying, modification or disposal of this personal information.
3. The President (or delegate) shall be the designated Privacy Officer for the organization and responsible for the implementation of the current policy (and associated information management practices) across all of NIED’s activities that involve the collection of personal information from individuals.
4. NIED will publish the name and business address of the Privacy Officer on the organization’s website and relevant organizational literature, as deemed appropriate by NIED’s President and/or Board of Directors.

5. NIED does not systematically collect, store or analyze identifiable personal information or data it may receive through its website or social media analytics.
6. NIED will never share an individual's personal information with any third-party without the consent of that individual. For example, NIED will always seek permission of members of the public who share their personal information with NIED notably for the purposes of seeking access to resources or care related to Eating Disorders resources in Canada. Stated differently, NIED will confirm with an individual requesting to be referred to a third-party organization that their personal information may be shared with that third-party.
7. If NIED participates in the collection, use or disclosure of personal information in the course of a commercial activity, NIED will take reasonable steps to safeguard this information in a manner that is consistent with standards outlined in the [Personal Information Protection and Electronic Documents Act](#) (PIPEDA).
8. NIED does not collect or store identifiable personal health information. However, if NIED is given personal health information by stakeholders, NIED shall take reasonable precautions to safeguard their personal information in a manner consistent with standards outlined in the [Personal Health Information Protection Act](#) (PHIPA) of Ontario.
9. In all cases, NIED ensures that it transparently and proactively communicates to all people from whom it collects personal information:
 - a. What personal information is being collected;
 - b. For what purposes personal information is being collected, used or disclosed (if permissible);
 - c. How NIED intends to use that personal information to further its educational mission;
 - d. With which parties personal information may be shared (if permissible); and
 - e. What risks of harm or other consequences might arise from any collection, use or disclosure of personal information provided to NIED.
10. NIED will notify individuals, at the first reasonable opportunity, whose personal information has been stolen, lost, disclosed or used in a manner that is not consistent with this policy and/or without the individual's consent.
11. NIED will provide training to its volunteers and adopt clear procedures to help its Committees and volunteers consult with and/or refer any questions regarding the protection of personal information to the Privacy Officer.

12. A written public statement reflecting this policy (and subsequent amendments) shall be posted on NIED's website (www.nied.ca) and provided to anyone who requests its, by contacting NIED's Privacy Officer at privacy@nied.ca
13. To gain access to any personal information you believe is under NIED's control, or to ask any questions regarding NIED's Privacy Policy, or to communicate any complaints regarding the handling of your personal information, please contact, in confidence, NIED's Privacy Officer by email at privacy@nied.ca. NIED's Privacy Officer will acknowledge receipt of your inquiry or complaint within 5 business days.

Review

The Board of Directors will review the foregoing policy every 2 years.

Inconsequential Amendments

Typographic, grammatical and similar errors can be corrected by the President or delegate without need to seek approval of the amended policy by the Board.

POLICY REVIEW

Reviewed by Board: July 5, 2019

Amended by Board: DATE

Approved by Board: July 5, 2019

PROTECTION OF PERSONAL INFORMATION GUIDELINES

1. When collecting and storing personal information from individuals, NIED shall:
 - a) inform individuals of the purposes for collection;
 - b) obtain appropriate consent;
 - c) allow individuals to withdraw consent at any time;
 - d) limit the collection of personal information (in both amount and type of information as well as without misleading or deceiving individuals) to that which is necessary for purposes identified and ensure it is collected by fair and lawful means;
 - e) take reasonable steps to ensure that information collected is correct, complete, and up-to-date;
 - f) implement adequate security measures to safeguard any personal information it collects from individuals;
 - g) make information on its personal information policies and practices available to the public;
 - h) implement a clear process and public communication on how individuals who have provided personal information to NIED can access their own personal information;
 - i) implement a clear process and public communication on how individuals can make inquiries or complaints to NIED regarding their personal information or the application of NIED's policies and practices regarding personal information.

2. Where warranted, NIED shall also adopt specific procedures and practices for the
 - a) retention and destruction of personal information it collects from individuals;
 - b) reporting to Senior Management of privacy policy and risk management procedures;
 - c) review of potential impacts to privacy before new products, services or information systems are introduced or existing ones are significantly changed;
 - d) requirements for identifying, assessing and reporting on the impact of, and correcting the cause of, privacy breaches including loss of personal information or inappropriate use of personal information.

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Version Control Sheet:

Version 1, March 6, 2019

Version 2, July 5, 2019