



# Privacy Policy

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## Introduction

The *Personal Information Protection and Electronic Documents Act* (PIPEDA) applies to the conduct of any commercial activity undertaken by a private organization that is of an inter-provincial or international nature. While not-for-profits are typically exempt from PIPEDA's application, not-for-profit status in and of itself is not determinative of whether the organization's collection, use or disclosure of personal information is carried out in the course of commercial activity (Rodgers v. Calvert, 2004 ON SC (CanLII)).

The AGE-WELL National Innovation Hub APPTA Inc. (APPTA) commits to taking all reasonable steps toward protecting any personal information collected by our organization. The purpose of this Privacy Policy is to provide the public with information regarding how APPTA collects, manages, uses, and discloses any personal information in our possession or control. This Policy applies to all personal information we collect or receive, and sets out a summary of any standards or procedures that APPTA will follow in meeting our privacy commitments and legal obligations in accordance with PIPEDA.

The Privacy Policy is current as of the effective date which appears on the cover page. If any changes are made, the effective date will be updated.

## What is Personal Information?

*Personal information is defined as factual or subjective information about an identifiable individual.*

Personal information includes any factual or subjective information about an identifiable individual, such as:

- Age, name, ID numbers, income, ethnic origin, or blood type;
- Opinions, evaluations, comments, social status, or disciplinary actions; and
- Employee files, credit records, loan records, medical records, existence of a dispute between a consumer and a merchant, intentions.

The following are examples of information that are not protected by PIPEDA<sup>1</sup>:

- Business contact information such as an employee's name, title, business address, telephone number or email addresses that is collected, used or disclosed solely for the purpose of communicating with that person in relation to their employment or profession;
- An individual's collection, use or disclosure of personal information strictly for personal purposes (e.g. personal greeting card list); and
- Personal information handled by federal government organizations listed under the Privacy Act.

At the time of this Policy, APPTA does not currently collect personal information in the conduct of business affairs.

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<sup>1</sup> Personal Information Protection and Electronic Documents Act (PIPEDA) s. 2(1)  
[http://www.mondaq.com/article.asp?article\\_id=752300&type=mondaqai](http://www.mondaq.com/article.asp?article_id=752300&type=mondaqai)

## Principle 1: Be Accountable

*APPTA is accountable for protecting any personal information in its possession or control, as well as any personal information being transferred by our organization to a third party.*

[1] APPTA is accountable for protecting any personal information in our possession or control, as well as any transfer of personal information to a third party. APPTA is not responsible or accountable for the protection of any personal information that is in the control or possession of a third party once a secure transfer has been completed.

[2] In order to comply with our obligations under PIPEDA, APPTA has established this Privacy Policy, as well as a Data Breach Policy. APPTA will be accountable for developing any additional policies and practices necessary for protecting personal information within its control or possession.

[3] The Executive Director of APPTA will be responsible for compliance with our contractual and legal privacy obligations, as well as this Policy and all other privacy protections in place within our organization. The Executive Director shall ensure that all employees of APPTA are provided with privacy compliance training.

## Principle 2: Identify the Purpose

*APPTA will always identify and explain the purpose for collecting any personal information before the information is collected.*

[4] APPTA shall identify and explain the purpose for collection of any personal information from you at the time when we ask for your consent to collect the information. The purpose for collection will be documented on all collection forms.

[5] Some of the primary purposes for which we may collect personal information include:

- To provide services to you in your capacity as a stakeholder of APPTA;
- To complete a transaction with you when you purchase an APPTA product or service;
- To advise you of APPTA products and services that may be of use to you;
- To respond to inquiries that you submit;
- To utilize our Boardroom Portal and other web-based services; and
- To conduct research and analytics for purposes that include, but are not limited to, better understanding of our stakeholders and their needs.

We may also collect your personal information for purposes permitted or required by law.

## Principle 3: Obtain Valid & Informed Consent

*APPTA will always obtain your consent prior to collecting, using, or disclosing any of your personal information.*

[6] APPTA commits to obtaining consent prior to collecting, using, or disclosing any of your personal information. In seeking consent, we will inform you of the type of personal information we are collecting, the purpose of collection, and any consequences of the collection, use, or disclosure of your personal information.

[7] We will always collect your personal information by fair and lawful means. Where it is reasonable to do so, or permitted by law, we may rely on implied consent.

[8] APPTA recognizes that consent is an ongoing activity in the collection, use, and disclosure of personal information. If any new purpose, use, or disclosure activity arises after we have already collected your personal information, we will ask for your consent again.

[9] You have the right to withdraw or modify your consent at any time, subject to any legal and contractual restrictions and provided that reasonable notice is given to APPTA. Withdrawal of consent may result in a disruption or termination of APPTA products and services where the personal information collected is required for the delivery of those products and services.

## Principle 4: Limit Collection

*APPTA will only collect personal information that is necessary to achieve the identified purpose of collection.*

[10] APPTA will only collect the amount and type of personal information from you that is necessary for the identified purposes that we have provided.

[11] Information regarding the nature of personal information collected will be available in all applicable privacy policies and practices.

## Principle 5: Limit Use, Disclosure and Retention

*APPTA discloses your personal information only for purposes for which it has consent, or as permitted or required by law.*

[12] APPTA will only use or disclose your personal information in accordance with the purposes identified when it was collected or as permitted or required by law. Before using or disclosing your personal information for any purpose outside of those provided at collection, we will seek your consent.

[13] APPTA will retain your personal information only for as long as necessary to satisfy or achieve the purposes set out at the time of collection. Physical copies of personal information will be retained in a locked cabinet in a locked office at all time. Virtual copies of personal information will be retained on a private network server at the APPTA offices.

[14] APPTA will shred any physical copies of personal information at a time when they are deemed no longer necessary for achieving the purpose identified at collection, or at any time if your consent is withdrawn or modified.



[15] APPTA will permanently erase or remove your personal information from all virtual files at a time when they are deemed no longer necessary for achieving the purpose identified at collection, or at any time if your consent is withdrawn or modified.

## Principle 6: Be Accurate

*APPTA endeavours to keep all personal information within its possession or control accurate, complete and up-to-date.*

[16] APPTA will ensure that your personal information is kept as accurate, complete and up-to-date as possible based on information provided to us by you. We expect you, from time to time, to supply us with written updates to your personal information, if applicable.

## Principle 7: Use Appropriate Safeguards

*APPTA will implement all reasonable safeguards to ensure the protection of personal information within our control or possession.*

[17] APPTA has implemented and will continue to implement appropriate physical, organizational, contractual and technological security measures to protect your personal information from loss or theft, unauthorized access, disclosure, copying, use or modification. Our current information safeguards include:

- a. Physical: all paper copies of personal information are held in locked filing cabinets at the APPTA head offices in Fredericton, NB;
- b. Organizational: APPTA has adopted a Privacy Policy and a Data Breach Policy, and will continue to implement policies to safeguard personal information as needed; and
- c. Contractual: all APPTA employees and Board members are required to complete a Non-Disclosure Agreement in order to protect any personal or private information in control or possession by the Company.

[18] Please note that it is your responsibility to protect any user identification and passwords related to the use of our products or services. If this information is disclosed, the privacy of your information cannot be assured by APPTA.

## Principle 8: Be Open

*APPTA is open about all procedures and policies in place relating to the collection, use and disclosure of personal information.*

[19] APPTA will strive to ensure all organizational policies and practices in place relating to the collection, use, and disclosure of personal information is available to and understandable by the general population.

## Principle 9: Give Individuals Access

*APPTA endeavours to make your personal information available to you when requested.*

[20] APPTA will generally make available to you any personal information that we have collected about you, utilized or disclosed, upon your written request, to the extent permitted or required by law. We will make such information available to you in a form that is understandable by the general population.

[21] You may, at any time, challenge the accuracy or completeness of the personal information we have which is related to you. Where we validate your identity, and you successfully demonstrate the inaccuracy or incompleteness of your personal information on file, we will amend the personal information as directed. Where appropriate, we will transmit the amended information to third parties who have access to your personal information through a transactional or contractual relationship with APPTA.

## Principle 10: Provide Recourse

*APPTA will address any comments, questions, concerns or complaints about our privacy policies and practices.*

[22] If you have any comments, questions, concerns or complaints about the collection, use or disclosure of your personal information by APPTA, you may file a request with our Executive Director, who can be reached at:

ATTN: Executive Director  
AGE-WELL National Innovation Hub APPTA Inc.  
100 Sunset Drive  
Fredericton, NB  
E3A 1N4  
Tel: 506-444-8300  
Email: [info@appta.ca](mailto:info@appta.ca)

[23] APPTA will attempt to respond to your written request not later than thirty (30) days after receipt of such requests. We will advise you in writing if we cannot meet your requests within this time limit.

[24] APPTA will investigate all complaints received and take all reasonable steps to address concerns or correct information handling practices and policies. You have the right to make a complaint to the federal Privacy Commissioner if you remain concerned about our privacy policies or practices. The Privacy Commissioner of Canada can be contacted through their website, which is available at: <https://www.priv.gc.ca/en/>