

The Ten Principles of Privacy

Principle 1 – Accountability

The PSHCP-AA is responsible for personal information under its control and shall designate one or more persons who are accountable for the PSHCP-AA's compliance with the following principles.

Responsibility for compliance with the provisions of the PSHCP-AA Privacy Policy rests with the PSHCP-AA Access to Information and Privacy Coordinator. The PSHCP-AA Privacy Coordinator can be contacted by e-mail at atip-airrp@pshcp.ca or by mail at:

Public Service Health Care Plan Administration Authority
P.O. Box 2245, Station D
Ottawa, Ontario K1P 5W4

Attention: Access to Information and Privacy Coordinator

Other individuals with the PSHCP-AA may be delegated to act on behalf of the Privacy Coordinator or to take responsibility for the day-to-day collection and/or processing of personal information.

The PSHCP-AA is responsible for personal information in its possession or control and shall use contractual or other means to provide a comparable level of protection while information is being processed or used by a third party.

Principle 2 – Identifying Purposes for Collection of Personal Information

The PSHCP-AA shall identify the purposes for which personal information is collected at or before the time the information is collected.

The PSHCP-AA collects personal information from the public only for the following purposes:

- a) to conduct quantitative or qualitative marketing and social research;
- b) to understand respondent opinions to establish suitability for further quantitative and qualitative marketing and social research; and
- c) to meet legal and regulatory requirements.

The PSHCP-AA shall specify orally, electronically or in writing the identified purposes to the respondent at or before the time personal information is collected in a survey. Upon request, persons collecting personal information shall explain these identified purposes or refer the individual to a designated person within the PSHCP-AA who can explain the purposes.

The PSHCP-AA may provide third parties with information from any survey, in aggregate form. In aggregate form it is impossible to identify an individual respondent's personal information.

Principle 3 – Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of an individual are required for the collection, use or disclosure of personal information, except where inappropriate.

Participation by respondents in panel research is always voluntary. When a respondent agrees to participate in a panel survey, he/she gives consent to the panel survey by participating.

A respondent is always free to choose whether or not to participate in a panel survey, free to choose not to answer any specific questions and free to discontinue participation at any time.

In obtaining consent, the PSHCP-AA shall use reasonable efforts to ensure that a respondent is advised of the identified purposes for which personal information will be used or disclosed. The identified purposes shall be stated in a manner that can be reasonably understood by the respondent.

Generally, the PSHCP-AA shall seek consent to use and disclose personal information at the same time as it collects the information. However, the PSHCP-AA may seek to use and/or disclose personal information after it has been collected, but before it is used and/or disclosed for a new purpose.

In determining the appropriate form of consent, the PSHCP-AA shall take into account the sensitivity of the personal information and the reasonable expectations of its respondents.

The participation of a respondent in a quantitative or qualitative marketing or social research study may constitute implied consent for the PSHCP-AA to collect, use and disclose personal information for the identified purposes.

Principle 4 – Limiting Collection of Personal Information

The PSHCP-AA shall limit the collection of personal information to that which is necessary for the purposes identified by the PSHCP-AA. The PSHCP-AA shall collect personal information by fair and lawful means.

In conducting surveys, the PSHCP-AA limits the amount and type of personal information it collects. We collect only the amount and type of information needed for the purposes identified to individuals.

The PSHCP-AA collects personal information about an individual primarily from that individual or a member of that individual's household.

Principle 5 – Limiting Use, Disclosure, and Retention of Personal Information

The PSHCP-AA shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by

law. Personal information shall be retained only as long as necessary for the fulfilment of those purposes.

The PSHCP-AA may disclose a respondent's personal information to:

- a) a third party engaged by the PSHCP-AA to perform functions on its behalf;
- b) a third party or parties, where the respondent consents to such disclosure or disclosure is required or permitted by law.

Only PSHCP-AA employees with a genuine business need to know, or whose duties reasonably so require, are granted access to personal information about respondents.

The PSHCP-AA will keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where a respondent may have to be re-contacted for purposes of clarifying responses to a survey, or to seek additional responses, the PSHCP-AA shall retain the personal information for a period of time that is reasonably sufficient to allow this re-contact.

The PSHCP-AA will maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased or made anonymous.

Principle 6 – Accuracy of Personal Information

Personal information will be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

Personal information used by the PSHCP-AA shall be sufficiently accurate, complete, and up-to-date to minimise the possibility that inappropriate information may be used to make a decision about a respondent.

The PSHCP-AA will update personal information about respondents and employees as necessary to fulfil the identified purposes or upon notification by the individual.

Principle 7 – Security Safeguards

The PSHCP-AA shall protect personal information by security safeguards appropriate to the sensitivity of the information.

The PSHCP-AA shall protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures, regardless of the format in which it is held.

The PSHCP-AA shall protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

All of PSHCP-AA employees with access to personal information shall be required to respect the confidentiality of that information.

The nature of the safeguards will vary depending on the sensitivity, amount, distribution and format of the information, and the method of storage. More sensitive information will be safeguarded by a higher level of protection.

Principle 8 – Openness Concerning Policies and Procedures

The PSHCP-AA shall make readily available to individuals specific information about its policies and procedures relating to the management of personal information.

The PSHCP-AA shall make information about its policies and procedures easy to understand, including:

- a) the title and address of the person or persons accountable for the PSHCP-AA's compliance with its Privacy Policy and to whom enquiries and/or complaints can be forwarded;
- b) the means of gaining access to personal information held by the PSHCP-AA;
- c) a description of the type of personal information held by the PSHCP-AA, including a general account of its use; and
- d) a description of what personal information is made available to third parties.

Principle 9 – Individual Access to Personal Information

Upon request, the PSHCP-AA will inform an individual of the existence, use, and disclosure of his or her personal information and shall give the individual access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Upon written request to the Access to Information and Privacy Coordinator, the PSHCP-AA will inform an individual of the existence, use and disclosure of his/her personal information and shall give him/her access to that information.

In certain situations, the PSHCP-AA may not be able to provide access to all the personal information that it holds about a respondent. For example, the PSHCP-AA may not provide access to information if doing so would be likely to reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, the PSHCP-AA may not provide access to information if disclosure would reveal confidential commercial information.

In order to safeguard personal information, a respondent may be required to provide sufficient identification information to permit the PSHCP-AA to account for the existence, use and disclosure of personal information and to authorise access to the individual's file. Any such information shall be used only for this purpose.

The PSHCP-AA shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, the PSHCP-AA shall transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.

Respondents and employees can obtain information or seek access to their individual files by contacting the Access to Information and Privacy Coordinator.

Principle 10 – Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable to the PSHCP-AA's compliance with the PSHCP-AA Privacy Policy.

The PSHCP-AA shall maintain procedures for addressing and responding to all enquiries or complaints from its respondents regarding the PSHCP-AA's handling of personal information.

The PSHCP-AA shall, on written request, inform its respondents about the existence of these procedures as well as the existence of complain procedures.

The person or persons accountable for compliance with the PSHCP-AA Privacy Policy may seek external advice where appropriate before providing a final response to individual complaints.

The PSHCP-AA shall investigate all complaints concerning compliance with its Privacy Policy. If a complaint is found to be justified, the PSHCP-AA shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. The respondent shall be informed of the investigation regarding his or her complaint.