



## PRIVACY STATEMENT

### INTRODUCTION

Economic Partners Sudbury East/West Nipissing Inc. is a federally supported not-for-profit community organization with a volunteer Board of Directors and professional staff whose purpose is to support community economic development and small business growth through business loans or loan guarantees.

This brochure summarizes Economic Partners Sudbury East/West Nipissing Inc.'s privacy policies and procedures that have been developed to comply with Canada's *Personal Information Protection and Electronic Documents Act* ("PIPEDA"). PIPEDA sets out rules for the collection, use and disclosure of a client's or customer's personal information, as well as safeguarding that information in the course of commercial activity as defined in the legislation.

### WHAT IS "PERSONAL INFORMATION"

Under PIPEDA, "Personal Information" means any information that is identifiable to an individual, including name, address, telephone number, Social Insurance Number, and date of birth. It also includes, but is not limited to, other information relating to identity, such as, nationality, gender, marital status, financial information and credit history.

### PURPOSES FOR PERSONAL INFORMATION

Economic Partners Sudbury East/West Nipissing Inc. collects only that personal information required to assess a prospective applicant's eligibility for financial assistance, as well as to report to Industry Canada, the

federal department that administers the Ontario Community Futures Program.

### CONSENT

At the time of completing a loan application, the express, written consent of the individual applicant will be sought for the collection, use, retention and disclosure of their personal information for the purposes set out in Economic Partners Sudbury East/West Nipissing Inc.'s privacy policy.

An applicant may choose not to provide some or all of the personal information requested, but if Economic Partners Sudbury East/West Nipissing Inc. is unable to collect sufficient information to validate a financing request, the application for financing may be turned down.

### ACCURACY

Economic Partners Sudbury East/West Nipissing Inc. endeavours to ensure that all personal information in active files are accurate, current and complete. When a client notifies Economic Partners Sudbury East/West Nipissing Inc. that his or her personal information requires correction or updating, the necessary changes will be made. Information contained in closed files is not updated.

### LIMITING USE, RETENTION & DISCLOSURE

Economic Partners Sudbury East/West Nipissing Inc. uses and retains personal information for only those purposes to which the individual has consented.

Personal information will be disclosed to only those Economic Partners Sudbury East/West Nipissing Inc. employees, volunteer members of committees and/or Board of Directors that need to know the information for the purposes set out in the Economic Partners Sudbury East/West Nipissing Inc. Privacy Policy.

### SAFEGUARDS

Economic Partners Sudbury East/West Nipissing Inc. utilizes a number of physical, organizational and technological measures to safeguard personal

information from unauthorized access or inadvertent disclosure in accordance with its *Information Security, Retention and Destruction Policy*, including but not limited to:

#### Physical

Active files are stored in locked filing cabinets located in work areas restricted to Economic Partners Sudbury East/West Nipissing Inc. employees and authorized volunteers. Closed files are stored in locked cabinets for a period of seven years, after which, the information is shredded prior to disposal.

#### Organizational

Economic Partners Sudbury East/West Nipissing Inc. employees, volunteers, and third party service providers sign confidentiality agreements binding them to safeguarding the confidentiality of personal information to which they have access.

#### Technological

Personal information contained on Economic Partners Sudbury East/West Nipissing Inc. computers and the electronic database are password protected. As well, the Internet server or router has firewall protection to protect against virus attacks and hacking into the database.

#### Electronic Transmission of Information

Notwithstanding the technological safeguards implemented by Economic Partners Sudbury East/West Nipissing Inc., all Internet transmissions are susceptible to possible loss, misrouting, interception and misuse. For this reason, as part of the application that individual's sign consenting to their personal information being collected, used, retained, and disclosed, Economic Partners Sudbury East/West Nipissing Inc. will assume that it has the individual's consent to communicate via the Internet unless notified to the contrary.

#### INDIVIDUAL ACCESS

An individual who wishes to review or verify what personal information is held by Economic Partners

Sudbury East/West Nipissing Inc., may do so by making a request, in writing to the Economic Partners Sudbury East/West Nipissing Inc.'s Chief Privacy Officer. Upon verification of the individual's identity, the Chief Privacy Office will provide a written report within 60 days.

### INVESTIGATING COMPLAINTS

Any concern or issue about Economic Partners Sudbury East/West Nipissing Inc.'s personal information handling practises may be made, in writing, to the Chief Privacy Officer. Upon verification of the individual's identity, the Chief Privacy Officer will act promptly to investigate the complaint and provide a written report to the individual.

If the individual is dissatisfied with the report provided by the Chief Privacy Officer, or feels that the corrective action taken by Economic Partners Sudbury East/West Nipissing Inc. is insufficient, the individual may direct a complaint to the Federal Privacy Commissioner in writing. The address of the Federal Privacy Commissioner is provided in this Privacy Statement for your convenience.

### AMENDMENTS TO OUR PRIVACY POLICY

This Privacy Statement is a summary of Economic Partners Sudbury East/West Nipissing Inc.'s Privacy Policy. For full particulars of Economic Partners Sudbury East/West Nipissing Inc.'s privacy policies and procedures, please request a copy of the Privacy Policy from Economic Partners Sudbury East/West Nipissing Inc. or a copy may be obtained from the Internet website at: [www.economicpartners.com](http://www.economicpartners.com).

The Economic Partners Sudbury East/West Nipissing Inc. Privacy Policy and this Privacy Statement are in effect January 28, 2004 and is retroactive to January 1, 2004. Economic Partners Sudbury East/West Nipissing Inc.'s Privacy Policy and this Privacy Statement may be updated from time to time to reflect amendments in applicable Federal and Provincial laws. Any changes to this Privacy Policy will be posted on Economic Partners Sudbury East/West Nipissing Inc. website and will apply to personal information collected from the date of the posting of the revised Privacy Policy.

### CONTACT INFORMATION

If you have any questions regarding Economic Partners Sudbury East/West Nipissing Inc.'s Privacy Policy, Information Security, Retention and Destruction Policy, and/or this Privacy Statement, or you wish to make an access to personal information request, please contact:

John Candie  
Chief Privacy Officer  
Economic Partners Sudbury East/West Nipissing Inc.  
30 Front Street, Unit A,  
Sturgeon Falls, Ontario P2B 3L4  
Phone: (705) 753-5450  
Facsimile: (705) 753-3456  
[john.candie@economicpartners.com](mailto:john.candie@economicpartners.com)

### OTHER HELPFUL PRIVACY LINKS

For a copy of *PIPEDA*, or for answers to other questions regarding privacy legislation, below are some helpful privacy links.

Federal Privacy Commissioner  
[www.privcom.gc.ca](http://www.privcom.gc.ca)  
112 Kent Street  
Ottawa, ON K1A 1H3

Provincial Privacy Commissioner  
[www.privcom.on.ca](http://www.privcom.on.ca)

Economic Partners Sudbury East/West Nipissing Inc.  
Privacy Policy Web Site:  
[www.economicpartners.com](http://www.economicpartners.com)

Siskind, Cromarty, Ivey & Dowler LLP  
Privacy Law Group:  
[www.siskindsprivacylaw.com](http://www.siskindsprivacylaw.com)



**Economic Partners**  
Sudbury East-West Nipissing  
**Partenaires dans l'économie**  
Sudbury Est-Nipissing Ouest

A Community Futures Development Corporation  
Une Société d'aide au développement des collectivités

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