

<p style="text-align: center;"><b>Personal Information Protection &amp; Electronic Documents Act</b> <b>Policies &amp; Procedures</b></p>
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In accordance with the Personal Information Protection and Electronics Documents Act (PIPEDA), the following are policies and procedures with respect to personal information collected by the Township of Severn.

**PURPOSE**

To implement policies and practices to give effect to the following principles:

- (a) implementing procedures to protect personal information;
- (b) establishing procedures to receive and respond to complaints and inquiries;
- (c) training staff and communicating to staff about the Township's policies and practices; and
- (d) developing information to explain the Township's policies and procedures.

**POLICIES**

1. **Accountability**

The Township of Severn is fully responsible for personal information collected and delegates the responsibility for dealing with compliance issues relating to privacy to the Head of Council and the Deputy Clerk. The collection of any personal information is also in accordance with the Municipal Freedom of Information and Protection of Privacy Act.

2. **Identifying Purposes**

When collecting personal information from individuals for any purpose, the Township shall inform the individual of the particular information required and the purpose for collecting this information by:

- making a reasonable effort to identify the purpose for which the personal information is collected
- ensuring that the purpose is related to the individual either before or at the time of collection

### 3. **Consent**

The Township of Severn shall obtain the consent of an individual for the collection, use or disclosure of personal information relating to that individual. Individuals may give consent by:

- (a) completing and signing an application form to give consent for collection of personal information and inform the individual of the use that will be made of the information;
- (b) checking off a box to allow individuals to request that their names and addresses not be given to other organizations (if box not checked, it is assumed to consent to the transfer of information to third parties);
- (c) giving consent orally when information is collected over the telephone; or
- (d) giving consent at the time that individuals use a product or service.

### 4. **Limiting Collection**

The Township of Severn may only collect information that is necessary for the purposes identified by the service being delivered.

### 5. **Limiting Use, Disclosure & Retention**

Limiting Use – The personal information collected may only be used for the purposes identified.

Disclosure – The personal information may only be disclosed for the purposes identified or when written or oral consent is given by the individual.

Retention – The personal information will be retained in accordance with the Township of Severn Records Retention By-law and related legislation.

### 6. **Accuracy**

The Township of Severn will ensure that personal information is accurate, complete and up-to-date as necessary for the purposes for which it is to be used. The Township is not responsible to routinely update the personal information. Individuals may review/challenge the accuracy of the information held by the Township and amend such information as appropriate.

7. **Safeguards**

The personal information collected by the Township of Severn shall be secured in an appropriate filing location which may include a locked cabinet with limited employee access.

8. **Openness**

The Township of Severn will ensure that there is public availability of all information while protecting the privacy of individuals under the PIPEDA and the Municipal Freedom of Information and Protection of Privacy Act. The policies and practices with respect to management of personal information shall be accessible by all individuals.

9. **Individual Access**

Individuals may request access to the personal information collected by the Township of Severn by:

- personally requesting the information either verbally or in writing;
- initially the records management charge out/in log sheet;
- retrieving the file from the appropriate personnel (key holders); and
- returning the file directly to the appropriate personnel for filing in a secured location.

10. **Challenging Compliance**

An individual may submit a complaint to the Deputy Clerk to question the existence of policies and practices and compliance with handling of personal information.