

PINCHER CREEK CREDIT UNION LTD.

CODE FOR THE PROTECTION OF PERSONAL INFORMATION



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Table of Contents

1	<u>INTRODUCTION</u>	III
2	<u>PURPOSE OF THIS DOCUMENT</u>	III
3	<u>DEFINITIONS</u>	IV
4	<u>THE CODE PRINCIPLES</u>	1
4.1	<u>PRINCIPLE 1 - ACCOUNTABILITY</u>	2
4.2	<u>PRINCIPLE 2 - IDENTIFYING PURPOSES</u>	3
4.3	<u>PRINCIPLE 3 - CONSENT</u>	4
4.4	<u>PRINCIPLE 4 - LIMITING COLLECTION</u>	6
4.5	<u>PRINCIPLE 5 - LIMITING USE, DISCLOSURE AND RETENTION</u>	7
4.6	<u>PRINCIPLE 6 – ACCURACY</u>	8
4.7	<u>PRINCIPLE 7 - SAFEGUARDS</u>	9
4.8	<u>PRINCIPLE 8 – OPENNESS</u>	10
4.9	<u>PRINCIPLE 9 - INDIVIDUAL ACCESS</u>	11
4.10	<u>PRINCIPLE 10 – CHALLENGING COMPLIANCE</u>	13

1 Introduction

Canada is part of a global economy based on the creation, processing, and exchange of information. The technology underlying the information economy provides a number of benefits that improve the quality of the protection of privacy rights and the individual's right to control the use and exchange of personal information.

Pincher Creek Credit Union Ltd. is a member-owned and controlled financial institution and, as such, has an inherent responsibility to be open and accessible while, at the same time, demonstrating the greatest respect for protection of the member's personal privacy.

Pincher Creek Credit Union Ltd. also serve non-members and shall ensure the same standards of protection are applied to these individuals as to members.

In adopting this Code for the Protection of Personal Information, what has been accepted practice becomes a documented commitment to the member.

2 Purpose of This Document

The Credit Union Code for the Protection of Personal Information (the Code), modeled after the ten principles of the Canadian Standards Association's (CSA) Model Code for the Protection of Personal Information, forms the basis for privacy compliance and reflects credit union limitations and differences.

3 Definitions

The following definitions apply in this Code:

Collection

The act of gathering, acquiring, or obtaining personal information from any source, including Third Parties, by any means.

Consent

Voluntary agreement with what is being done or proposed. Consent can be either express or implied. Express consent is given explicitly, either orally or in writing. Express consent is unequivocal and does not require any inference on the part of the credit union seeking consent. Implied consent arises where consent may reasonably be inferred from the action or inaction of the member.

Disclosure

Making personal information available to others outside the credit union.

Member

The person who is a member and owner of the credit union. This Code applies equally to the collection, use or disclosure of personal information about members and non-members. Where the term 'member' is used, its intent is also to include non-members.

Organization

A term used in the Code that includes business corporations, partnerships, professional practices, persons, government bodies, institutions, associations, charitable organizations, clubs, unions, or any other form of organization.

Personal Information

Any information that is about or can be linked to an identifiable individual, but does not include the name, title or business address or telephone number of an employee or organization.

Privacy Officer

The person within the credit union who is responsible for overseeing the collection, use, disclosure and protection of the members' personal information, and the credit union's day-to-day compliance with the Code.

Subsidiary

A company or organization wholly-owned or controlled by the credit union.

Third Party

Any person or organization other than the credit union or the member.

Use

Refers to the treatment and handling of personal information within the credit union.