



# Federation for the Humanities and Social Sciences PRIVACY CODE

May 2020

## Introduction

The Canadian Federation for the Humanities and Social Sciences (hereafter, the “Federation”) values the trust of those it represents and is committed to protecting the privacy of the personal information of its employees, governors, members, partners and other stakeholders. We acknowledge that maintaining this trust requires us to be transparent and accountable in how we treat the information shared with us.

This Privacy Code incorporates the 10 Principles of the Canadian Standards Association Model Code on the Protection of Personal Information which was published in March 1996 as a National Standard of Canada. It also incorporates the provisions of Part 1 of the *Personal Information Protection and Electronic Documents Act*.

## Principle 1 - Accountability

The Federation is responsible for all personal information under its control, including personal information transferred to third parties for processing. The Federation has designated an individual who is accountable for the organization's compliance with this Code.

1.1 The Federation Privacy Officer is responsible for compliance with this Code, even though other individuals within the Federation may be responsible for the day-to-day collection and processing of personal information, and may be delegated to act on behalf of the Privacy Officer.

1.2 The identity of the individuals designated by the Federation to oversee compliance with this Code will be made known internally and will be made available externally on request.

1.3 Where the Federation acts as a processor of personal information or as a service provider to others, for example online membership renewals, the Federation will comply with this Privacy Code and any Privacy Statements issued by the Federation with respect to personal information it collects, uses or discloses on behalf of third parties or that is transferred to it.



## **Principle 2 - Identifying the purpose of personal information collection**

The Federation will identify the purposes for which personal information is collected, used or disclosed at or before the time the information is collected.

2.1 The Federation collects and uses primarily business names and addresses of individuals for the purposes of:

- Promoting the yearly Congress of the Humanities and Social Sciences;
- Communicating information to its members;
- Responding to any information requests;

2.2 The Federation will seek written consent from its employees before transferring personal information collected to a third party to provide and administer payroll and benefits services.

2.3 Individuals will be advised of the purposes for which the information is collected at the time information is collected, or as soon as practicable thereafter. An individual may, at any time, request or be given an explanation of how their personal information is being used.

2.4 If the Federation proposes to use or disclose personal information for a purpose not previously identified, the new purpose will be identified and documented prior to the new use. Unless the new purpose is required or permitted by law, the consent of the individual will be obtained before the information can be used or disclosed for that purpose. (See Obtaining consent below.)

## **Principle 3 - Obtaining consent**

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

3.1 The Federation may collect, use or disclose personal information without the knowledge or consent of individuals. All of the circumstances in which the Federation may collect, use or disclose personal information without the knowledge or consent of an individual shall be only as specified and permitted by legislation.

3.2 In obtaining consent, the Federation will use reasonable efforts to ensure that an individual is advised of the identified purposes for which personal information will be used or disclosed. Purposes will be stated in a manner that can be reasonably understood by the individual.

3.3 Generally, the Federation will seek consent to use and disclose personal information at the same time it collects the information. However, the Federation may seek consent to use and disclose personal information after it has been collected, but before it is used or disclosed for a new purpose.



3.4 In determining the appropriate form of consent, the Federation will take into account the sensitivity of the personal information and the reasonable expectations of individuals in relation to the purposes for use or disclosure of the information by the Federation.

3.5 An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Individuals may contact the Federation for more information regarding the implications of withdrawing consent.

3.6 Individuals may opt out or refuse to consent to the use or disclosure of their personal information for marketing purposes by contacting the Federation Privacy Officer by email at [privacy@ideas-idees.ca](mailto:privacy@ideas-idees.ca) or by postal mail at 275 Bank, Suite 300, Ottawa ON K2P 2L6.

## **Principle 4 - Limiting collection of personal information**

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

4.1 The Federation collects personal information primarily from individuals directly.

4.2 The Federation may also collect personal information from other sources including publishers, universities and associations.

## **Principle 5 - Limiting use, disclosure and retention of personal information**

The Federation will 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 authorized by law. Personal information will be retained only as long as necessary for the fulfillment of those purposes.

5.1 The Federation may disclose personal information about an individual to the following for the purposes set out in Section 2:

- to a third party providing the Federation payroll and benefit services for its employees;
- to a third party, for peer review purposes;
- to a third party for association membership renewals online;
- to a third party, where the individual consents to disclosure or where disclosure is required or authorized by law.

5.2 The Federation has a records retention policy that specifies the length of time that records are maintained. All personal information is accessible only by the Federation's personnel, or service providers, who need access to that information for the performance of their duties or services.

5.3 The Federation will not sell, rent or trade personal or business contact information.



## **Principle 6 – Keeping personal information accurate**

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

6.1 Information will be sufficiently accurate, complete and up to date so as to minimize the possibility that inappropriate information may be used to make a decision about an individual.

6.2 The Federation will update personal information about individuals on an on-going basis when necessary to fulfill the purposes identified in this Code, or upon notification by the individual.

## **Principle 7 - Safeguarding personal information**

The Federation will protect personal information with security safeguards appropriate to the sensitivity of the information.

7.1 The Federation will protect personal information against loss or theft as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which the information is held, using appropriate security safeguards.

7.2 The Federation shall protect personal information transferred to third parties providing services to the Federation through contractual measures or other arrangements stipulating the confidentiality of the information, restricting the purposes for which the information is to be used and prohibiting its disclosure to third parties upon direction from the Federation in accordance with this Privacy Code.

## **Principle 8 - Being open about policies and procedures**

The Federation will make readily available to individuals specific information about its policies and procedures relating to the management of personal information.

8.1 The Federation will be open about its policies and procedures with respect to the management of personal information. Individuals will be able to acquire information about our policies and procedures at minimal or no cost and without unreasonable effort. This information will be made available in a form that is generally understandable.



## Principle 9 - Providing access to personal information

On written request, and subject to exemptions stipulated by law, the Federation will inform an individual of the existence, use and disclosure of their personal information and will provide access to that information. An individual will be entitled to challenge the accuracy and completeness of the information and have it amended where inaccuracies exist.

9.1 In certain situations, the Federation may not be able to provide access to all of the personal information that it holds about an individual. These situations shall be limited to those required or stipulated by law.

9.2 When an individual successfully challenges the accuracy or completeness of personal information, the Federation will correct, delete or add information as required. When appropriate, the amended information will be transmitted to any third parties having access to the information in question.

## Principle 10 - Challenging compliance

An individual employee of the Federation will be entitled to address a challenge concerning compliance by the Federation with this Code to the Federation Privacy Officer.

10.1 The Federation will implement procedures to receive and respond to complaints or inquiries about its policies and procedures relating to the handling of personal information.

10.2 The Federation will investigate all complaints. If a complaint is found to be justified, the Federation will take appropriate measures, including amending its policies and procedures if necessary.

10.3 Individuals will be able to obtain more information on the Federation's privacy practices, or make a complaint, by contacting:

Federation for the Humanities and Social Sciences  
200 – 141 Laurier Avenue West, Ottawa, ON K1P 5J3  
Email: [privacy@ideas-idees.ca](mailto:privacy@ideas-idees.ca)

10.4 Individuals also have recourse to the Office of the Privacy Commissioner of Canada if they consider that the Federation has not responded satisfactorily to their complaint or inquiry.

Office of the Privacy Commissioner of Canada  
30, Victoria Street  
Gatineau, Quebec K1A 1H3  
Phone: (819) 994-5444  
Toll-free: 1-800-282-1376  
TTY: (819) 994-6591  
Website: <https://www.priv.gc.ca/en/>



FEDERATION FOR THE  
**HUMANITIES AND  
SOCIAL SCIENCES**

FÉDÉRATION  
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For a copy of the Personal Information Protection and Electronic Documents Act, please access the website of the Privacy Commissioner of Canada at <https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/>.

The CSA Model Code is Schedule 1 to the Personal Information Protection and Electronic Documents Act. For copies of the CSA Model Code for the Protection of Personal Information, please contact the Canadian Standards Association, 178 Rexdale Blvd., Toronto, Ontario M9W 1R3 or online at <http://www.csagroup.org/>.