

# PRIVACY POLICY

MAY 2008



## Introduction

This Privacy Policy on the collection, use, storage and maintenance of personal information was developed in accordance with the Personal Information Protection and Electronic Documents Act (PIPEDA) from the Office of the Privacy Commissioner of Canada.

The purpose of this policy is to define the minimum standards and guidelines for the collection, use, storage, and maintenance of personal information by the Canadian Federation of Medical Students (CFMS).

This policy applies to any individual conducting business for the CFMS, including its Executive Committee, Officers, Members, and partners and to any and all personal information held by the CFMS.

This policy was developed to recognize that the CFMS values the privacy of medical students in Canada, while appreciating that certain personal information needs to be collected, maintained, and used to best represent medical students and provide membership benefits to individuals.

## Definitions

### *Personal information*

Personal information includes all data regarding an individual (whether an Individual Member of the CFMS or a member of an Institutional Member of the CFMS) including but not limited to name, e-mail address, medical school, expected year of graduation, mailing address, and phone number.

## Privacy Principles

### *1. Accountability:*

The CFMS is responsible for the maintenance and security of personal information under its purview.

Personal information collected by the CFMS will be under the oversight of the CFMS VP Services and Information Technology Officer. These two individuals will regulate access to the database of information (which will be limited to CFMS Staff and Executive Committee). When necessary and feasible, the CFMS VP Services and Information Technology Officer will also be responsible for separating identifying information from datasets.

The CFMS Executive Committee will be educated of this policy and the appropriate management of personal information at the beginning of their term.

### *2. Identifying Purposes:*

The purposes for which personal information is collected will be identified by the CFMS at or before the time the information is collected.

### *3. Consent:*

The knowledge and consent of the individual is required for the collection, use, or disclosure of personal information by the CFMS. Either written or oral consent will be obtained for collecting, using and disclosing personal information. Implied consent is permitted for the ongoing use of personal information, consistent with the purposes for which it was collected.

### *4. Limiting Collection:*

The collection of personal information shall be limited to that which is necessary for the purposes identified by the CFMS at the time of collection. All information shall be collected by fair and lawful means.

The two primary routes for personal information collection may be carried out by the CFMS:

*Voluntary disclosure:* These would be situations where individual students fill out forms or surveys disclosing personal information. This would also include registration on the CFMS website. Any time that an individual discloses personal information to the CFMS, there will be attached a description of the purpose of the information to be collected and its use in the future as well as reference to this policy statement.

*Mass disclosure:* This situation may arise when a database of personal information is provided to the CFMS via a third party. Third parties could include medical student societies, student interest groups, or medical school administrations. The CFMS would provide those organizations with information about the purpose of the information to be collected and its use in the future. In these situations, the CFMS will be responsible for ensuring that the information collection, storage, use, and maintenance meets the privacy and disclosure policies herein and that of the third party.

If the CFMS wishes to use personal information for a purpose not outlined at time of collection, the CFMS identifies the new purpose and will seek and obtain consent of members to use information for this purpose.

### *5. Limiting Use:*

Personal information is not used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

The CFMS will also temporally limit the information obtained to what is relevant to the current membership. For information that is retained beyond CFMS membership expiry, that information will be designated "Alumni Information" and be subject to relevant review and possible disposal. Further, the presentation of information regarding membership will be done in aggregate form, and necessary steps will be taken to mask small cell sizes to avoid identification of an individual by association.

### *6. Accuracy:*

The CFMS creates and maintains a database of personal information using the most accurate and up to date information available. The CFMS will also updates or remove personal information as required or if requested by the individual.

*7. Safeguards:*

The CFMS takes appropriate measures to prevent loss, theft or disclosure of personal information. These measures include a restricted access to information by identified personnel on a “need to know” basis and technological safeguards such as firewall and password protected access to the electronic database.

*8. Openness:*

The CFMS makes readily available to members specific information about its policies and practices relating to the management of personal information upon request and at time of collection of information. This policy will be made available publicly on the CFMS website, and be available upon request from the CFMS Office.

*9. Individual Access:*

Upon request, the CFMS member is informed of the existence, use and disclosure of his or her personal information and access to that information. The CFMS member can also change or update his or her information using an automated system or through the CFMS VP Services or Information Technology Officer.

*10. Challenging Compliance:*

Any individual shall be able to raise issues concerning compliance with the above principles with the individuals accountable for the CFMS’s compliance, namely the VP Services and President.