



# Policy Concerning the Protection of Personal Information

## 1. INTRODUCTION

The Canadian Pharmacists Association (CPhA) is the national voluntary organization of pharmacists. In the course of providing our services, CPhA may collect Personal Information and we have prepared this policy to inform you about our ongoing commitment to ensuring that the Personal Information obtained during the course of our activities remains accurate and confidential.

## 2. WHAT IS PERSONAL INFORMATION?

We consider “Personal Information” to mean any information, recorded in any form, about an identified individual or an individual whose identity may be inferred or determined from such information, other than business contact information (e.g. name, title, business address). This Policy does not cover aggregated data from which the identity of an individual cannot be determined. CPhA retains the right to use aggregated data in any way that it determines appropriate.

## 3. WHY CPhA MAY COLLECT PERSONAL INFORMATION

CPhA may use the Personal Information provided verbally or in writing (including via electronic media) by members and other third parties in order to:

- ▶ Authenticate CPhA members in order to communicate with them and deliver appropriate member services;
- ▶ Process membership applications;
- ▶ Process payments for Association products and services;
- ▶ Conduct aggregate research on trends in health care and pharmacy, and report our findings;
- ▶ Provide reference materials and other information to our members and others who request such information;
- ▶ Provide members and other relevant parties with information about our products and services (including by means of direct marketing);
- ▶ Publish and distribute our various Association communications;
- ▶ Organize conferences and other programs/events of interest to our members and other relevant parties;
- ▶ Permit affiliated organizations and preferred suppliers to provide products, services and information to members and other relevant parties;
- ▶ Respond to inquiries or comments;
- ▶ Meet legal and regulatory requirements; and
- ▶ Such other purposes consistent with these purposes.

The personal information we ask for will depend upon which services you may obtain.



#### 4. HOW CPhA COLLECTS AND USES PERSONAL INFORMATION

CPhA only collects, uses and discloses Personal Information for purposes that would be considered reasonable in the circumstances and only such information as is required for the purposes of providing services or information to our members and others. We use only fair and lawful methods to collect Personal Information.

Our use of Personal Information is limited to the purposes described in this Policy and CPhA does not otherwise sell, trade, barter, exchange or disclose for consideration any Personal Information it has obtained.

#### 5. WHEN CPhA MAY DISCLOSE YOUR PERSONAL INFORMATION

CPhA may disclose your Personal Information to individuals or organizations:

- ▶ Who are our service providers; and
- ▶ Who are involved in:
  - i Maintaining, reviewing and developing our business systems, procedures and infrastructure including testing or upgrading our computer systems or
  - ii A reorganization of CPhA.

In the event sensitive Personal Information is provided to CPhA, we will not disclose such Personal Information unless it is required in order to provide a member or another individual with our services.

Where CPhA discloses Personal Information to organizations that perform services on its behalf, we will require those service providers to use such information solely for the purposes of providing services to CPhA, its members or the person concerned and to have appropriate safeguards for the protection of that Personal Information.

Where Personal Information may be subject to transfer to another organization in contemplation of a reorganization of all or part of CPhA, we will do this only if the parties have entered into an agreement under which the collection, use and disclosure of the information (including any Personal Information) is restricted to those purposes that relate to the transaction, including a determination of whether or not to proceed with the transaction, and is to be used by the parties to carry out and complete the transaction.

Please note that there are circumstances where the use and/or disclosure of Personal Information may be justified or permitted or where CPhA is obliged to disclose information without consent. Such circumstances may include:

- ▶ Where required by law or by order or requirement of a court, administrative agency or governmental tribunal;
- ▶ Where CPhA believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety or property of an identifiable person or group;
- ▶ Where it is necessary to establish or collect monies owing to CPhA;
- ▶ Where it is necessary to permit CPhA to pursue available remedies or limit any damages that we may sustain; or
- ▶ Where the information is public.

Where obliged or permitted to disclose information without consent, CPhA will not disclose more information than is required.



## 6. CONSENT

Unless permitted by law, no Personal Information is collected, without first obtaining the consent of the individual concerned to the collection, use and dissemination of that information. However, we will seek consent to use and disclose Personal Information after it has been collected in those cases where we wish to use the information for a new or different purpose and the individual concerned has not yet consented to such a use of their personal information.

**By providing Personal Information to CPhA you agree and consent that we may collect, use and disclose your Personal Information in accordance with this Policy.** In addition, where appropriate, specific authorizations or consents may be obtained from time to time.

In most cases and subject to legal and contractual restrictions, you are free to refuse or withdraw your consent at any time upon reasonable, advance notice. It should be noted that in certain circumstances, such as Membership, services can only be offered if you provide Personal Information to CPhA. Consequently, if you choose not provide us with any required Personal Information, we may not be able to offer you the services requested. We will inform you of the consequences of the withdrawal of consent.

## 7. THE ACCURACY AND RETENTION OF PERSONAL INFORMATION

CPhA endeavours to ensure that any Personal Information provided and in its possession is as accurate, current and complete as necessary for the purposes for which we use that information. If we become aware that Personal Information is inaccurate, incomplete or out of date, CPhA will revise the Personal Information and, if necessary, use its best efforts to inform third parties which were provided with inaccurate information so that those third parties may also correct their records.

We keep your Personal Information only as long as it is required for the reasons it was collected. The length of time we retain information varies, depending on the service and the nature of the information. This period may extend beyond the end of a person's relationship with us but it will be only for so long as it is necessary for us to have sufficient information to respond to any issues that may arise at a later date.

When your Personal Information is no longer required for CPhA's purposes, we have procedures to destroy, delete, erase or convert it into an anonymous form.

At present, the principal place in which CPhA holds Personal Information is in the city of Ottawa.

## 8. PROTECTION OF PERSONAL INFORMATION

CPhA endeavours to maintain appropriate physical, procedural and technical security with respect to its offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of Personal Information. This also applies to our disposal or destruction of Personal Information.

CPhA further protects Personal Information by restricting access to it to those employees that the management of CPhA has determined need to know that information in order that we may provide our services.

If any employee of CPhA misuses Personal Information, this will be considered as a serious offence for which disciplinary action may be taken, up to and including termination of employment. If any individual or organization misuses Personal Information — provided for the purpose of providing services to or for CPhA — this will be considered a serious issue for which action may be taken, up to and including termination of any agreement between CPhA and that individual or organization.



## 9. ACCESS TO YOUR PERSONAL INFORMATION

CPhA permits the reasonable right of access and review of Personal Information held by us about an individual and will endeavour to provide the information in question within a reasonable time, generally no later than 30 days following the request. To guard against fraudulent requests for access, we may require sufficient information to allow us to confirm that the person making the request is authorized to do so before granting access or making corrections.

We will provide information from our records in a form that is easy to understand. CPhA reserves the right not to change any Personal Information but will append any alternative text the individual concerned believes to be appropriate.

CPhA reserves the right to decline to provide access to Personal Information where the information requested:

- ▶ Would disclose (i) Personal Information, including opinions, about another individual or about a deceased individual; or (ii) trade secrets or other business confidential information that may harm CPhA or the competitive position of a third party;
- ▶ Would interfere with contractual or other negotiations of CPhA or a third party;
- ▶ Is subject to solicitor-client, litigation or other legal privilege;
- ▶ Is not readily retrievable and the burden or cost of providing would be disproportionate to the nature or value of the information;
- ▶ Does not exist, is not held, or cannot be found by CPhA;
- ▶ Could reasonably result in (i) serious harm to the treatment or recovery of the individual concerned, (ii) serious emotional harm to the individual concerned or another individual, or (iii) serious bodily harm to another individual;
- ▶ May harm or interfere with law enforcement activities and other investigative or regulatory functions of a body authorized by law to perform such functions; or
- ▶ May be withheld or is requested to be withheld under applicable legislation.

Where information will not or cannot be disclosed, the individual making the request will be provided with the reasons for non-disclosure.

CPhA will not charge you for verifying or correcting your information, however, to the extent permitted by applicable law, there may be a minimal charge imposed if you need a copy of records.

## 10. WEB SITE

Our web servers track general information about visitors such as their domain name, time of visit, IP address and which pages are being accessed. This information is used only in aggregate form, to better serve visitors by helping us to:

- ▶ Manage our site;
- ▶ Diagnose any technical problems; and
- ▶ Improve the content of our websites.

In browsing the web, you will encounter a technology known as “cookies”. “Cookies” are files or pieces of information that may be stored in a computer's hard drive when an individual visits a website. Most Internet browsers are initially set to accept cookies. If you do not wish to accept cookies, you can set



yours to refuse cookies or to alert you when cookies are being sent. "Session" cookies are temporary bits of information that are erased once a visitor exits its web browser window or otherwise turn its computer off. Session cookies are used to improve navigation on websites and to collect aggregate statistical information. Our website uses session cookies.

"Persistent" cookies are more permanent bits of information that are placed on the hard drive of a visitor's computer and stays there unless it is deleted. Persistent cookies store information on a visitor's computer for a number of purposes, such as retrieving certain information previously provided (e.g., passwords), helping to determine what areas of the website visitors find most valuable, and customizing the website based on visitor preferences. Our website does not use persistent cookies.

We do not share Personal Information obtained through cookies with any third parties.

We have no control over the content of third party web sites that individuals may access through hyperlinks at our Web site. We encourage everyone to read the privacy policy of every web site they visit.

## **11. RESOLVING YOUR PRIVACY CONCERNS**

In the event of questions about: (i) access to your Personal Information; (ii) our collection, use, management or disclosure of Personal Information; or (iii) this Policy; please contact CPhA's Privacy Officer by sending an e-mail to [info@pharmacists.ca](mailto:info@pharmacists.ca) or calling 1-800-917-9489 and asking to speak with CPhA's Privacy Officer.

CPhA will investigate all complaints and if a complaint is justified, we will take all reasonable steps to resolve the issue.