



AUTISM FOR LIFE FOUNDATION

PERSONAL INFORMATION & PROTECTION POLICY (PIPP)
This policy is applied to all aspects of our foundation at all times.

PRIVACY POLICY

The Autism for Life Foundation (“AFLF,” “our foundation,” “we,” “our”) is committed to safeguarding the personal information entrusted to us by our beneficiaries, contractors, donors, members, and volunteers. We manage your Personal Information in accordance with Alberta’s Personal Information Protection Act (PIPA), the Privacy Act, Personal Information, Protection Electronic Documents Act (PIPEDA), the Health Information Act (HIA), and other applicable laws.

This policy outlines the principles and practices we follow in protecting your personal information. This policy applies to AFLF and/or to any person providing services on our behalf. A copy of this policy is provided to any beneficiary, contractor, donor, and volunteer during screening, training, engagement, re-engagement, and upon request.

WHAT IS PERSONAL INFORMATION?

PERSONAL INFORMATION – means information about an identifiable individual. This can include any factual or subjective information, recorded or not, including an individual’s name, home address and phone number, age, sex, marital or family status, identifying number, financial information, educational history, etc.

INDIVIDUAL - includes AFLF beneficiaries, contractors, donors’ members, and volunteers.

WHAT PERSONAL INFORMATION DO WE COLLECT?

We collect only the personal information that we need for the purposes of providing services to our beneficiaries and members, including personal information needed to:

- Deliver requested assistance and/or services;
- Enroll a beneficiary into a program;
- Send out association membership information;
- Screen volunteers and board members.

We normally collect Personal Information directly from Individuals. We may collect Personal Information from other persons with your consent or as authorized by law.

SOURCES OF INFORMATION EXAMPLES OF PERSONAL INFORMATION

This is a list of sources where your information may be collected by AFLF and/or any other organization that may need access to your information.



AUTISM FOR LIFE FOUNDATION

RESUMÉS	Name, address, contact details, education, skills, and previous work and/or volunteer experience
APPLICATION FORMS	Name, address, contact details, education, previous work experience, gender, date of birth, and emergency contact information
INTERVIEW, REFERENCES & CREDENTIALS	Specific information related to work experience, qualifications, character, skills, and personality
ATTENDANCE INFORMATION	Volunteer days/hours worked, training, orientation attendance, positions held
ID CARD	Photographic image of face, unique identifying number
POLICE RECORDS CHECKS & VULNERABLE SECTOR CHECKS	Police Records Check, driver's license, driving abstract, insurance information (including any license limitations), and health screening information
SIGNED AGREEMENTS	Volunteer Handbook - signed agreement page, signed confidentiality agreements, etc.
SUPPORT, SUPERVISION & EVALUATION	Evaluations, awards, letters of reference, or disciplinary letters/issues
BENEFICIARY CONTRACTOR MEMBER DONOR VOLUNTEER INFORMATION	Personal information of beneficiaries, contractors, donors, members, volunteers, participating in or supported by programs and services

We inform Individuals before and/or at the time of collecting personal information of the purposes for which we are collecting the information.

The only time we don't provide this notification is when Individual's Personal Information is collected for an obvious purpose.
CONSENT

We ask for consent to collect, use, and/or disclose beneficiaries, contractors, donors, members, and volunteers personal information, except in specific circumstances where collection, use and/or disclosure without consent is authorized and/or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose. We assume your consent to continue to use and, where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask beneficiaries, donors, contractors, members, and volunteers to provide their consent orally (in person, by telephone), or in writing (by signing a consent form).



AUTISM FOR LIFE FOUNDATION

CONSENT (continued)

In cases that do not involve sensitive personal information, we may rely on “opt-out” consent. For example, we may disclose your contact information to other organizations that we believe may be of interest to you, unless you request that we do not disclose your information. You can do this by checking the appropriate box on our application form or by telephoning our local number/toll-free number.

A beneficiary, contractor, donor, member, and volunteer may withdraw consent to the use and disclosure of personal information at any time unless the personal information is necessary for us to fulfil our legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary personal information.

We may collect, use and/or disclose beneficiary, contractor, donor, member and, volunteer personal information without consent only as authorized by law. For example, we may not request consent when the collection, use or disclosure is to determine suitability for an honour or award, or in an emergency that threatens life, health, and/or safety (incident report mandatory), and/or if AFLF is served with a Court Order from the Court of King’s Bench.

THERE ARE OCCASIONS WHEN CONFIDENTIALITY MUST BE WAIVED

- If any Individual has reason to believe that an individual is a danger to themselves and/or others, they have a legal responsibility to report this to the appropriate authorities;
- If a file is ordered to be released by the court, the information must be released;
- Information indicating child abuse or neglect must be reported to Child Welfare authorities;
- What a child/ward informs AFLF and/or any other members will be treated as confidential unless a staff member determines that there are some risk factors that a parent/guardian needs to know.

HOW DO WE USE AND/OR DISCLOSE PERSONAL INFORMATION?

We use and disclose client personal information only for the purpose for which the information was collected, except as authorized by law. Below is a detailed list of questions we contently apply to our foundation to ensure that your information is collected, used, and/or disclosed in accordance with the laws and our own standards of practice. When working with our foundation, if you have any questions and/or concerns with regard to our Privacy Inventory please raise them, we want to establish a trusting and transparent relationship with all members of our community.

If we wish to use and/or disclose your personal information for any new business purpose, we will ask for your consent first. We may not seek consent if the law allows this (e.g., the law allows organizations to use personal information without consent for the purpose of collecting a debt).



AUTISM FOR LIFE FOUNDATION

PRIVACY POLICY INVENTORY

HOW IS IT SECURED?	WHO HAS ACCESS TO OR USES IT?	TO WHOM IS IT DISCLOSED?
WHEN IS IT DISPOSED?	WHAT PERSONAL INFORMATION DO WE COLLECT?	HOW DO WE COLLECT IT?
WHO DO WE COLLECT PERSONAL INFORMATION ABOUT?	WHAT DO WE USE IT FOR?	WHERE DO WE KEEP IT?
WHY DO WE COLLECT IT?		

WHAT IS PERSONAL EMPLOYEE INFORMATION?

Personal employee information is Personal Information about an employee and/or volunteer which is collected, used and/or disclosed solely for the purposes of establishing, managing and/or terminating an employment relationship and/or a volunteer work relationship. Personal employee information may, in some circumstances, include a Social Insurance Number, a performance review, volunteer form, incident report etc.

We can collect, use and/or disclose your personal employee information without your consent only for the purposes of establishing, managing and/or ending the employment and/or volunteer relationship. We will provide current employees and volunteers with prior notice about what information we collect, use and/or disclose and our purpose for doing so.

WHAT PERSONAL EMPLOYEE INFORMATION DO WE COLLECT, USE AND/OR DISCLOSE?

- o Determining eligibility for employment or volunteer work, including verifying qualifications and references
- o Establishing training and development requirements
- o Assessing performance and managing performance issues if they arise
- o Administering pay and benefits (paid employees only)
- o Processing employee work-related claims (e.g., benefits, workers' compensation, insurance claims) (paid employees only)
- o Complying with requirements of funding bodies (e.g., lottery grants)
- o Complying with applicable laws (e.g., Canada Income Tax Act, Alberta Employment Standards Code)

We only collect, use and disclose the amount and type of personal employee information that is reasonable to meet the above purposes. The following is a list of personal employee information that we may collect, use and disclose to meet those purposes:

- o Contact information such as: your name, home address, telephone number;
- o Criminal Background, Vulnerable Sector Checks, and/or Child Intervention Record Check (IRC);
- o Employment and/or volunteer information such as your resume (including educational background, work history and/or references), reference information and/or interview notes, letters of offer and/or



AUTISM FOR LIFE FOUNDATION

acceptance of employment, policy acknowledgement forms, background verification information, workplace performance evaluations, and emergency contacts, etc.;

- o Benefit information such as forms relating to applications or changes to health and insurance benefits including medical and dental care, life insurance, short- and long-term disability, etc. (paid employees only);
- o Financial information, such as pay cheque deposit information and tax-related information, including Social Insurance Numbers (paid employees only);
- o Other personal information required for the purposes of our employment or volunteer relationship.

We will inform our employees and/or volunteers of any new purpose for which we will collect, use, and/or disclose personal employee information, or we will obtain your consent, before or at the time the information is collected.

We will obtain your consent to collect, use and disclose your personal information for purposes unrelated to the employment and/or volunteer relationship (e.g., such as nominating you for a community enrichment award).

WHAT INFORMATION DO WE PROVIDE FOR EMPLOYMENT/VOLUNTEER REFERENCES?

In some cases, after your employment and/or volunteer relationship with us comes to a close, we will be contacted by other organizations and asked to provide a reference for you. It is our policy not to disclose personal information about our employees and/or volunteers to other organizations who request references without consent. It is our goal to ensure everyone obtains their employment and/or volunteer reference letter annually for your records and to ensure the disclosure meets your expectations and applicable laws.

THE PERSONAL INFORMATION WE NORMALLY PROVIDE IN A REFERENCE INCLUDES:

- i. Confirmation that an individual was an employee or volunteer, including the position, and date range of the employment or volunteering.
- ii. General information about an individual's job duties and information about the employee or volunteer's ability to perform job duties and success in the employment or volunteer relationship.

HOW DO WE SAFEGUARD PERSONAL INFORMATION?

We make every reasonable effort to ensure that personal information is accurate and complete. We rely on Individuals to notify us if there is a change to their personal information that may affect their relationship with our organization. If you are aware of an error in our information about you, please make us aware and we will correct it on request if the request is reasonable and/or accurate. In some cases, we may ask for a written request for correction.

We protect personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure and/or modification of personal information, as well as any unauthorized access to personal information.

We use appropriate security measures when destroying personal information, including shredding paper records, permanently deleting electronic records, and properly recycling technological devices. We retain personal information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes. Two years is the standard for a non for profit within Alberta, and Ten years for medical information.

WEBSITE PRIVACY POLICY



AUTISM FOR LIFE FOUNDATION

When AFLF's website is visited, the following information is collected and stored: the computer's operating system, Internet Protocol (IP) address, geographical location, browser type, referral source, time and date of visit, length of visit and number of page views, and any tools used while on the site.

AFLF uses the above information to analyze the use and performance of its website, including creating aggregated data or website analytics. Personal information collected through the website will only be used by persons authorized by AFLF to access the information for the purposes provided in this Policy or the purposes set out in the portal. Sending confidential or personal information through the Internet comes with inherent risks of interception or inadvertent disclosure.

DIGITAL MARKERS

A digital marker is a piece of data (for example, a "cookie" or HTML5 file) sent by a website and stored on a user's computer to optimize a user's experience on a website. AFLF uses digital markers to create a more integrated authentication process and an improved user experience resulting in customized content for repeat webpage visitors. A user may disable digital markers in a user's browser settings.

THIRD PARTIES

AFLF does not sell personal information to third parties!

Third parties are sometimes contracted by AFLF to assist in operating autismforlife.ca/autismforlife.org and conducting business associated with the website; therefore, these third parties may have access to personal information if necessary in certain circumstances. AFLF may disclose personal information to its professional affiliates, but only when appropriate to do so under PIPA.

THIRD-PARTY LINKS AND SOCIAL MEDIA

AFLF may link to third-party websites. These sites have separate and independent privacy policies and terms of use. AFLF assumes no responsibility or liability for the content and activities of these linked sites.

AFLF uses social media as part of its regulatory function and internet presence. Any user who interacts with AFLF social media accounts must read and abide by the terms of use and privacy policies of the applicable social media organization. Personal information provided to AFLF through social media will be used to respond to inquiries, for statistical, evaluation and reporting purposes, and for those purposes set out in this Policy. AFLF reserves the right to delete any posts on social media sites used by AFLF.

ACCESS TO RECORDS CONTAINING PERSONAL INFORMATION

Individuals have a right to access their own personal information in a record that is in the custody or under the control of the Autism for Life Foundation, subject to some exceptions. For example, organizations are required under the Personal Information Protection Act to refuse to provide access to information that would reveal personal information about another individual.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to the Autism for Life Foundation directors' email info@autismforlife.org

You must provide sufficient information in your request to allow us to identify the information you are seeking. You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization. In addition, you may request a correction of an error and/or omission in your personal information.



AUTISM FOR LIFE FOUNDATION

We will respond to your request within forty-five calendar days unless an extension is granted. We may charge a reasonable fee to provide information, but not to make a correction. We do not charge fees when the request is for personal employee information. We will advise you of any fees that may apply before beginning to process your request. If you meet the Low-Income Cut Off's there will be no fees charged to you for making an information request.

QUESTIONS AND COMPLAINTS

If you have a question and/or concern about any collection, use or disclosure of Personal Information by the Autism for Life Foundation, or about a request for access to your own Personal Information, please contact the Autism for Life Foundation directors' email info@autismforlife.org

If you are not satisfied with the response you receive, you are to contact

The Information and Privacy Commissioner of Alberta (OIPC)
Office of the Information and Privacy Commissioner of Alberta
Suite 2460, 801 - 6 Avenue, SW
Calgary, Alberta T2P 3W2
Ph: 403-297-2728
Toll Free: 1-888-878-4044
E: generalinfo@oipc.ab.ca
W: www.oipc.ab.ca

Please be advised that OPIC will demand evidence, you cannot just tell them, you must prove your claims, and you only have 60-days from the day of our response to submit a complaint to their offices. If you bypass the 60-day timeline you will need to request for an extension.