



# **The Certified General Accountants Association of Alberta Privacy Policy**

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**Table of Contents**

**TABLE OF CONTENTS ..... 2**

**PROTECTING YOUR PRIVACY IS IMPORTANT TO US!..... 3**

**OUR COMMITMENT TO YOU..... 3**

**OUR PRIVACY PRINCIPLES..... 4**

**PRIVACY PROTECTION IN CANADA ..... 5**

**WHAT INFORMATION IS COLLECTED? ..... 6**

**TYPES OF INFORMATION WE COLLECT ..... 7**

**INFORMATION REQUIRED FOR COMMON ACTIVITIES ..... 9**

**CONSENT..... 9**

**HOW YOUR INFORMATION IS USED ..... 10**

**WHAT INFORMATION MAY BE DISCLOSED TO OUTSIDE PARTIES..... 11**

**SALE OF INFORMATION ..... 13**

**HOW WE SAFEGUARD YOUR INFORMATION..... 14**

**ACCESSING AND AMENDING YOUR INFORMATION ..... 15**

**QUESTIONS, CONCERNS AND COMPLAINTS..... 16**

## Protecting Your Privacy is Important to Us!

In just a few short years, the Internet has revolutionized the way the world does business. It allows individuals and organizations to interact with each other offering information and providing additional value. The Certified General Accountants Association of Alberta (CGA Alberta) has been at the leading edge of the Internet revolution. We have been able to provide a host of services that members and students can access from the convenience of their home or office.

While the Internet has brought many benefits, it also raises legitimate concerns about privacy and security. CGA Alberta is dedicated to protecting your privacy and safeguarding your personal information. However you choose to provide information to us, we will strive to maintain appropriate physical, procedural and technical security of your personal information.

We invite you to use this section of our Website to learn more about government legislation that is designed to protect your privacy. In addition, we have provided an overview of the type of information we collect and how it is used, as well as the steps we have taken to ensure your personal information is handled appropriately.

## Our Commitment to You

CGA Alberta is committed to safeguarding your confidentiality and protecting your personal information. It is a fundamental tenet of the way we do business. This commitment has not changed with the arrival of the Internet and other online services. Instead, it has been extended to ensure that any online business you conduct with the Association is safe, private, and secure.

The Association is also committed to meeting or exceeding the privacy standards being established by federal and provincial regulators and industry bodies. We will comply with the Alberta *Personal Information Protection Act (PIPA)* and with the federal *Personal Information Protection and Electronic Documents (PIPED) Act* to the extent that they are applicable.

## Our Privacy Principles

CGA Alberta has always been, and will continue to be, committed to maintaining the accuracy, confidentiality, and security of your personal information. As part of this commitment, we have established Privacy Principles to govern our actions as they relate to the use of member and student information. You are invited to review these principles, which have been built upon the values set by the Canadian Standards Association's *Model Code for the Protection of Personal Information*, PIPA (Alberta) and PIPEDA (Canada).

|              |   |
|--------------|---|
| Principle 1  | Accountability                              |
| Principle 2  | Identifying Purposes                        |
| Principle 3  | Consent                                     |
| Principle 4  | Limiting Collection                         |
| Principle 5  | Limiting Use, Disclosure and Retention      |
| Principle 6  | Accuracy                                    |
| Principle 7  | Safeguarding Member and Student Information |
| Principle 8  | Openness                                    |
| Principle 9  | Member and Student Access                   |
| Principle 10 | Handling Complaints and Suggestions         |

### ***Principle 1 - Accountability***

CGA Alberta is responsible for maintaining and protecting member and student information under its control. In fulfilling this mandate, CGA Alberta has designated an individual who is accountable for compliance with the Privacy Principles.

### ***Principle 2 – Identifying Purposes***

The purpose for which member and student information is collected shall be identified before or at the time the information is collected.

### ***Principle 3 – Consent***

The knowledge and consent of the member and student are required for the collection, use or disclosure of personal information, except where (*PIPA*) provides otherwise.

### ***Principle 4 – Limiting Collection***

The member and student information collected must be limited to those details necessary for the purposes identified by CGA Alberta. Information must be collected by fair and lawful means.

### ***Principle 5 – Limiting Use, Disclosure and Retention***

Member and student information may only be used or disclosed for the purpose for which it was collected unless the member and student have otherwise consented, or when it is required or permitted by law. Member and student information may only be retained for the period of time required to fulfil the purpose for which it was collected.

***Principle 6 – Accuracy***

Member and student information must be maintained in as accurate, complete and up-to-date form as is necessary to fulfill the purposes for which it is to be used.

***Principle 7 – Safeguarding Member and Student Information***

Member and student information must be protected by security safeguards that are appropriate to the sensitivity level of the information.

***Principle 8 - Openness***

Members and students shall have access to information concerning the policies and practices that apply to the management of their information.

***Principle 9 – Member and Student Access***

Upon request, members and students shall be informed of the existence, use and disclosure of their information, and shall be given access to it. Members and students may verify the accuracy and completeness of their information, and may request, if appropriate, that it be amended.

***Principle 10 – Handling Complaints and Suggestions***

Members and students may direct any questions or enquiries with respect to the privacy principles outlined above or about our practices by contacting the designated person(s) accountable for privacy at CGA Alberta.

## **Privacy Protection in Canada**

This privacy policy has been developed with reference to the standards established by the Canadian Standards Association *Model Code for the Protection of Personal Information*, PIPA (Alberta) and PIPEDA (Canada).

***Personal Information Protection and Electronic Documents Act***

*PIPEDA*, formerly referred to as Bill C-6 balances an individual's right to privacy while recognizing the need for industry and other organizations to collect, use and disclose personal information. This law, as its name suggests, encompasses two primary objectives. The first objective is to establish rules that govern the collection, use and disclosure of personal information by private sector organizations. The second objective is to acknowledge the validity and legality of electronic documents.

This federal law will significantly impact the way private businesses, corporations, federal agencies, not-for-profit organizations and associations will handle the personal information with which they have been entrusted. At the same time, the Act has clearly established a code of privacy practices that provide Canadians from coast to coast with a mechanism to ensure their personal information is handled respectfully.

The heart of this Act is based on the principles established by the CSAs *Model Code for the Protection of Personal Information*. These principles were recognized as a Canadian standard in 1996 and address the ways, in which organizations should collect, use and disclose personal information. They also address an individual's right to access their personal information in addition to their right to have it amended where appropriate.

In order to govern the commercial-handling practices within provincial jurisdictions, each province has been encouraged to enact legislation that is substantially similar to the federal law. To date, some provinces have enacted such legislation and some other provinces have not. Alberta enacted PIPA on December 4, 2003 which will govern most activity within Alberta, including the CGA Association. However, PIPEDA will continue to regulate cross-border, inter-provincial and international trade and commerce.

### ***Personal Information Protection Act (PIPA)***

PIPA establishes a framework for a consistent set of privacy principles and standards for the private sector in Alberta. The fair information principles in the Act set out the minimum requirements for how private sector organizations can collect, use, disclose and protect personal privacy. In addition, the Act gives individuals a right to know what information an organization holds about them and a right to ask for it to be corrected if it is wrong. The Act also allows the individuals to complain to the Information and Privacy Commissioner about the way their personal information is being handled by organizations or about decisions on their access or correction requests.

For more information regarding the Federal legislation, please visit the official Website of the Privacy Commissioner of Canada at <http://www.privcom.gc.ca>. For more information regarding the Provincial legislation, please visit the official Website of the Alberta Government Services and the Office of the Information and Privacy Commissioner at <http://www.psp.gov.ab.ca>.

## **What Information is Collected?**

At CGA Alberta, we gather and use personal information to provide you with the services you have requested or to offer additional products and services we believe you might be interested in. Most of the information we collect comes to us directly from you. For example, when enrolling in a course or CPD event, we will ask you to provide the information that enables us to complete your request.

The types of information we may ask for depends on the nature of your request. Information that is essential for fulfilling most requests and applications typically includes your name, mailing address, e-mail address, phone number(s) and contact ID number. We may also request additional information to help us identify members and students who may be interested in serving on Committees, Task Forces and Chapters, or as volunteers for various Association activities and events.

When you visit the public areas of the CGA Alberta Website, no information is collected that could personally identify you, unless you voluntarily choose to provide it. You are welcome to browse the public area of the CGA Alberta Website at any time

anonymously and privately without revealing any personal information about yourself. When you visit areas of the Website with access restricted to members or students, we will need to know and validate who you are. We will endeavour to ensure that personal information provided to us will be maintained in a secure and confidential manner.

## **Types of Information We Collect**

The way in which CGA Alberta delivers its services has changed dramatically in recent years. Over the past years, we have changed from a paper-based organization to one that provides a wide variety of Web based self-service options. Having up-to-date and accurate information helps us provide you with the best possible service in this “real time” environment.

At CGA Alberta, we collect two types of information from our members and students and from CGA Alberta Website visitors - personal information and anonymous/non-personal information.

### ***Personal Information***

Personal information is information that refers to you specifically. With your consent, we may gather personal information from you in person, at our office, over the telephone or by corresponding with you via mail or the Internet.

The type of information we usually collect and maintain for individuals who are neither members nor students of CGA Alberta includes:

- Name
- Mailing addresses - personal & business
- E-mail addresses
- Telephone and fax numbers - both personal & business
- Correspondence and contact history
- Transaction history

The type of information we usually collect and maintain for members and students of CGA Alberta includes:

|  |  |
|--|--|
| Name   | Correspondence and contact history     |
| Mailing addresses - personal & business          | Place of employment                    |
| E-mail addresses                                 | Education history                      |
| Telephone & fax numbers –<br>personal & business | Professional development history       |
| Date of birth                                    | Transaction history                    |
| Gender   | Income level                           |
| Mother’s maiden name                             | Employment history                     |
|  | Any findings of unprofessional conduct |

For registrants engaged in any aspect of a public accounting practice, alone or through a professional corporation, a duly authorized incorporated company, or a partnership, the Association usually collects and maintains the following additional information:

- Firm name
- Mailing address
- Name of partners
- Name of any related business or practice
- Preferred areas of practice
- The nature and scope of the practice
- Practice review results
- Related correspondence
- Professional liability insurance information
- Contact history
- Professional development history (public practice specific)
- Information as to any restrictions placed on a practice

The choice to provide us with personal information is always yours. It should be noted however, that if you are a member or student of CGA Alberta, your decision to withhold particular details may impact on your ability to meet the membership requirements and/or the education program enrolment requirements of the Association.

#### ***Anonymous/Non-Personal Information***

The Association routinely collects anonymous/non-personal information. This type of information cannot be associated with or traced back to a specific individual or entity. For example, our Web servers collect some anonymous/non-personal information automatically when you visit the CGA Alberta Website. This information may include the pages you visited, the type of Web browser you are using, the level of encryption your browser supports and your Internet Protocol address. The anonymous/non-personal information collected may be used for research and analytical purposes. For example, we are able to determine how many times our online privacy policy has been visited but we do not know any specific information about those visitors. To help us better understand our markets, we may also gather information for analytical purposes by conducting anonymous member and student surveys and by extracting demographic information from existing files.

## **Information Required for Common Activities**

The type of information you will be asked to provide will vary according to your activity or request as indicated in the following examples.

### ***Browsing the CGA Alberta Website***

You may browse the CGA Alberta Website anonymously and privately if you do not wish to interact with the site or use online services. No personal information will be collected from you without your knowledge and consent. However, if you wish to enter areas of the Website that are restricted for the use of members or students only, you will be required to provide personal information.

### ***Course Enrolment***

If you are currently enrolled in the CGA Alberta education program, or are a member in good standing, you may enroll in courses either manually or by using the online course enrolment process. During the enrolment process, you will be asked to confirm your identification number and update your name, address and contact information and you may be required to provide your credit card information.

### ***CPD Reporting***

Whether reporting your continuing professional development (CPD) activities using the online process or through a manual process you will be asked to provide details of the CPD courses taken. Using the online process you will be prompted to update your personal information prior to proceeding with the updating of your CPD record. Using the manual process you will be asked to verify or update your personal information.

### ***Dues Payments and Alternative Status Applications***

Paying your dues or applying for an alternative status can be done manually or by using the online process. During either process you will be asked to verify or update your personal information. You may be asked to provide your credit card information, and depending on the alternative status you apply for, you may be asked to supply income level, birth date, employment status, health related issues, education and children's age.

## **Consent**

Unless we hear otherwise from you, your uses of CGA Alberta products and services, and/or your enrollment as a student or member of CGA Alberta, constitutes consent for CGA Alberta to collect, use, and disclose personal information for the purposes stated in this Policy.

You may refuse or withdraw consent at any time, subject to legal and contractual restrictions and reasonable notice. The choice to provide us with your personal information is always yours. Please note, however, that if you are a member or a student of CGA Alberta, your decisions to withhold particular information may impact your ability to meet the membership requirements and/or student program enrollment requirements of CGA Alberta.

You may refuse or withdraw your consent by contacting us at 1-800-661-1078. Our staff will explain your options and any consequences of refusing or withdrawing consent, and will record your choices.

## **How Your Information is Used**

At CGA Alberta, we use three primary types of information:

- We use personal information to communicate with you, process applications and ultimately to provide you with the services you have requested.
- We use transactional information to keep track of and report back to you on your dealings with us.
- We use anonymous/non-personal information for operational research purposes and to improve our products and services to you.

## ***Personal Information***

We use your personal information to communicate with you, process applications and effectively provide the services you have requested. When you become a CGA Alberta member or student, we make every effort to establish and maintain a positive relationship with you. We will authenticate your identity, send you important notices, and respond to any special needs or enquiries you may have. We may also send you information about other products and services in which we believe you would be interested.

## ***Transactional Information- Members and Students***

The transactional information retained about members and students relates to financial transactions and program transactions including education, continuing professional development, public practice registration and practice review.

## ***Anonymous/Non-Personal Information***

The anonymous/non-personal information gathered from the CGA Alberta Website is used primarily for technical, research and analytical purposes. This information does not include any personal information and is only retained until its intended purpose is fulfilled.

CGA Alberta strives to continuously improve our service offerings to you. To do so, we use anonymous/non-personal information collected from surveys, from public archives (Statistics Canada) and by extracting demographic information from existing files to better understand the interests, priorities, and satisfaction levels of our members, students and visitors to the Website.

## **What Information May be Disclosed to Outside Parties**

### ***Affiliates***

#### **CGA-Canada**

Information extracted from the CGA Alberta member and student database is periodically provided to CGA-Canada. The information that is provided to CGA-Canada is as follows:

- Home address
- Preferred mailing address
- Birth date
- Gender
- Record of academic and professional accomplishments outside of the CGA program of studies
- A record of all courses enrolled in for the current year including the status of the enrolment
- Employment data including employer name, address, telephone and fax number, email address, industry type of the employer, position held and title of position
- What region of the province the member or student resides in
- Member classification

Governed by the provisions of an affiliation agreement between CGA-Canada and CGA Alberta, the above information is used by CGA-Canada for the following purposes:

- Mailings approved by the CGA Affiliates for national programs such as CGA Magazine, annual reports, notices of Annual General Meetings and other statutory requirements, group insurance, marketing of national professional development programs, member surveys and any other mailing required by CGA-Canada to meet its corporate obligations
- To support analysis, research and management of educational, membership, marketing and public relations programs
- If a third party enquires of CGA-Canada as to whether or not an individual is a member or student of CGA Alberta, CGA-Canada may only confirm that a person is a member or student at a certain time. However, CGA-Canada is obligated to advise the person making the enquiry that CGA Alberta must be contacted in order to obtain the current status.

The agreement prohibits CGA-Canada from providing any personal information to third parties, selling the information in the database to third parties or providing summary non-personal information in the database to third parties without first obtaining the agreement of CGA Alberta.

#### ***When Required by Law***

The type of information we are legally required to disclose most often relates to government tax reporting requirements. In some instances such as a legal proceeding or court order, we may also be required to disclose certain information to authorities. Only the information specifically requested is disclosed and we take precautions to satisfy ourselves that the authorities that are making the request have legitimate grounds to do so.

#### ***When Permitted by Law***

There are some situations where we are legally permitted to disclose personal information such as when employing reasonable and legal methods to collect a delinquent account, a medical emergency or suspicion of illegal activities.

## **Sale of Information**

At CGA Alberta, member and student information is strictly confidential. We never sell, lease or trade personal information about you to other parties.

### ***Our Employees***

In the course of daily operations, access to private, sensitive and confidential information is restricted to those employees whose job responsibilities require them to access it. For example, only staff involved in the administration of Discipline cases can access personal information related to that process.

All employees of CGA Alberta are required to abide by the privacy standards we have established. They are also required to work within the principles of ethical behaviour as set out in our staff guidelines and must follow all applicable laws and regulations.

Unauthorized access to and/or disclosure of personal information by an employee of CGA Alberta is strictly prohibited. All employees are expected to maintain the confidentiality of member and student information at all times and failing to do so will result in appropriate disciplinary measures, which may include dismissal.

### ***Outside Service Suppliers***

At CGA Alberta, we occasionally employ outside organizations to perform specialized services such as surveys, mailings, market research or data processing. These trusted service suppliers may at times be responsible for processing and handling some of the information we receive from you. When we contract suppliers to provide specialized services, they are only provided the information necessary to perform those services.

## **How We Safeguard Your Information**

The Association uses state-of-the-art technologies and maintains current security standards to ensure that your personal information is protected against unauthorized access, disclosure, inappropriate alteration or misuse. All safety and security measures are also appropriate to the sensitivity level of your information.

### ***Client Files***

Electronic client files are kept in a highly secured environment with restricted access. Paper-based files are stored in our secure operating premises.

### ***Online Security***

We manage our server environment appropriately and our firewall infrastructure is strictly adhered to. Our security practices are reviewed on a regular basis and we routinely employ current technologies to ensure that the confidentiality and privacy of your information is not compromised.

Security measures are in place to protect the loss, misuse and alteration of the information under our control. Any CGA Alberta employee who may have access to such information is aware of the CGA Alberta Privacy and Web Data Protection Policy through direct notification and training. Access to such information is limited to those required to fulfill the applicable user request, and security procedures in place include password protection and, as appropriate, alphanumeric passwords, physical protection or encryption.

## **Accessing and Amending Your Information**

The Association bases many of its operating decisions on member and student information. Therefore, it is important that your personal information is accurate and complete. As a member and student, you have the right to access, verify and amend this personal information.

### ***Accessing Your Information***

As a member and student, PIPA provides you with certain rights to access, verify and amend this personal information. You may access and verify the personal information contained within your CGA profile contained within the CGA Alberta website at any time to ensure the accuracy of such personal information. To do so, visit the CGA Alberta website and click on my CGA Profile at [www.CGA Alberta.org](http://www.CGA Alberta.org) or call the CGA Alberta offices at (800)661-1078. In addition, PIPA provides you with further rights to have inaccurate personal information corrected.

### ***Amending Your Information***

To help us keep your personal information up-to-date, we encourage you to amend inaccuracies and make corrections as often as necessary. Despite our best efforts, errors sometimes do occur. Should you identify any incorrect or out-of-date information in your file(s), we will make the required changes.

## Questions, Concerns and Complaints

If you have a question about the privacy policies stated on this site, please contact us at [www.privacy@CGA Alberta.org](mailto:www.privacy@CGA Alberta.org).

If you have a concern or complaint about privacy, confidentiality or the information handling practices of CGA Alberta, our employees or service suppliers, please contact the Director, Member Services at [privacy@CGA Alberta.org](mailto:privacy@CGA Alberta.org).

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