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OP 02: Privacy Policy

1. Introduction

The Canadian Council for Continuing Education in Pharmacy (CCCEP) is committed to respecting the privacy of individuals. CCCEP recognizes that the people with whom we do business, such as our program providers and other stakeholders, as well as our volunteers and employees, rely on us for the appropriate management and protection of any Personal Information that they provide to us.

This policy describes the practices of CCCEP regarding the collection, use, retention and disclosure of information that may be gathered for the purpose of: (1) fulfilling our mandate as the national accrediting body for continuing pharmacy education and (2) meeting our legal requirements under the *Canada Not-for-Profit Corporations Act*.

The policy is structured to ensure CCCEP is compliant with the Personal Information Protection and Electronic Documents Act (PIPEDA), Canada’s anti-spam legislation (CASL) and any other relevant legislation. In the event of a conflict between this policy and those Acts, the latter shall prevail.

2. Collection, Use and Retention of Personal Information

2.1 CCCEP collects and uses business and personal information for the following purposes:

- 2.1.1 To process requests for program and provider accreditation;
- 2.1.2 To inform stakeholders of changes to CCCEP policies, processes or procedures that may impact their responsibilities related to CCCEP services;
- 2.1.3 To fulfill CCCEP’s corporate legal and responsibilities and obligations;
- 2.1.4 To fulfill CCCEP’s responsibilities as an employer and volunteer organization; and
- 2.1.5 To maintain records to ensure accurate remuneration and reimbursement of expenses.

2.2 CCCEP’s approach to the collection, use, disclosure and retention of Personal Information is as follows:

- 2.2.1 **Collection:** CCCEP collects personal information about various individuals and organizations (providers, suppliers, employees, volunteers etc.) in order to perform its accreditation services. CCCEP limits the collection of personal information to that required for valid business purposes or to comply with legislation.

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2.2.1.1 **Program Providers.** The information collected will be limited to: (1) business contact information; and (2) information necessary to facilitate payment of accreditation fees.

2.2.1.2 **Volunteers.** The information collected will be limited to: (1) contact information for purposes of communicating with volunteers; (2) information on education, credentials and work experience provided when applying to be a volunteer; and (3) information required by the Canada Revenue Agency.

2.2.1.3 **Employees and Directors.** The information collected will be limited to: (1) contact information for purposes of communicating with employees and directors; (2) information on background and qualifications provided when applying for a position; (3) information required to pay wages and expenses; (4) information required by CCCEP’s banking or financial institutions pertaining to signing officers; and (4) information required by the Canada Revenue Agency or Corporations Canada.

2.2.2 **Use and Disclosure:** Reasonable efforts are taken to fully inform individuals about the planned use/disclosure of their information. Unless the individual consents otherwise, personal information is only used or disclosed for the purposes for which it was collected or as required by legislation.

2.2.3 **Retention:**

2.2.3.1 CCCEP will only retain personal information collected for as long as required to serve the purposes for which it was collected and to meet the obligations of any pertinent legislation pertaining to that information.

2.2.3.2 CCCEP will store personal information using hard copy and/or electronic means in such a way as to prevent unauthorized access, and with security measures commensurate with the sensitivity of the information.

2.2.3.3 If personal information is taken off-site or stored off-site for any period of time, such as during periods where an employee is working remotely or from home, security measures will be taken to protect unauthorized access to the information, commensurate with the sensitivity of the information.

2.3 **Accuracy:** CCCEP makes every reasonable effort to ensure that the personal information it collects and uses is accurate, complete, and up-to-date.

2.4 **Access to personal records**

2.4.1 CCCEP promotes the individual’s right of access to personal information about themselves and will provide access to information upon request. Access will be provided according to established procedures.

2.4.2 Access to a record may be subject to the payment of a fee.

2.5 **Email Communication**

2.5.1 CCCEP does not use its website or database to send mass emails to stakeholders.

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- 2.5.2 CCCEP’s email communication, including the use of group emails (e.g. provider contact list, panel reviewers) is conducted by CCCEP employees and generally only to provide information to these stakeholders pertinent to their engagement with CCCEP in the accreditation application or review process.
- 2.5.3 Any marketing emails that may be undertaken from time to time would be conducted in compliance with CASL.

2.6 Website

- 2.6.1 CCCEP allows access and browsing of our website without the disclosure of personal data.
- 2.6.2 CCCEP does not use cookies.
- 2.6.3 The CCCEP website does not enable our visitors to communicate with other visitors or to post information to be accessed by others, with the exception of the presenter-author-reviewer database.

3. Accountability

- 3.1 The Executive Director shall serve as the Chief Privacy Officer for CCCEP.
- 3.2 The Executive Director shall adopt administrative procedures to ensure CCCEP’s compliance with as aspects of this policy.
- 3.3 The Executive Director will report any compliance issues to the Board of Directors within 15 days of becoming aware of an issue.
- 3.4 The Executive Director will report any complaints received regarding CCCEP’s handling of personal information in accordance with the reporting and communication obligations contained within CCCEP’s complaints policy.
- 3.5 The Executive Director shall promptly investigate any complaints. Timelines for resolution should be less than three months, unless there are extraordinary circumstances that require additional time for thorough investigation.
- 3.6 In accordance with PIPEDA, the Executive Director shall report any breach of security safeguards involving personal information under CCCEP’s control to the Office of the Privacy Commissioner of Canada if it is reasonable in the circumstances to believe that the breach of security safeguards creates a real risk of significant harm (RROSH) to an individual.
 - 3.6.1 Significant harm includes bodily harm, humiliation, damage to reputation or relationships, loss of employment, business or professional opportunities,

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financial loss, identity theft, negative effects on the credit record and damage to or loss of property.

- 3.6.2 Factors that are relevant to determining whether a breach of security safeguards creates RROSH include the sensitivity of the personal information involved in the breach of security safeguards and the probability the personal information has been/is/will be misused.

4. Complaints

4.1 Individuals who feel their personal information was not handled in accordance with this policy may direct a complaint to the Executive Director.

- 4.1.1 If the complainant feels that the breach of this policy was made by the Executive Director, they should contact the Administrative Assistant of CCCEP, who will connect the complainant via email to the President of CCCEP's Board of Directors. The President will receive the complaint and initiate an investigation.

4.2 All complaints should be made in writing. Email is acceptable.

4.3 Sufficient detail should be provided to allow for a thorough investigation of the complaint.

4.4 Complaints will be addressed in a timely manner.

4.5 As PIPEDA requires that privacy breaches that reach a specified threshold must be reported to the Privacy Commissioner of Canada, complainants are advised that pertinent information will have to be shared with the Privacy Commissioner as part of CCCEP's reporting process.

4.6 Complainants are reminded that if they feel CCCEP's handling of their personal information is not compliant with PIPEDA they may contact the Office of the Privacy Commissioner of Canada.

5. Contact Information

5.1 For further information on CCCEP's privacy policy and practices, please contact the Executive Director at:

Phone: 709-221-4082
 E-Mail: exec.dir@cccep.ca
 Website: www.cccep.ca

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5.2 To make a complaint regarding CCCEP's handling of personal information and application of this policy, please contact either the Executive Director or the Administrative Assistant, in accordance with section 4 of this policy, as follows:

Executive Director
 Suite 205, 25 Kenmount Road
 St. John's NL
 A1B 1W1
Exec.dir@cccep.ca

Administrative Assistant
 Suite 205, 25 Kenmount Road
 St. John's NL
 A1B 1W1
admin.asst@cccep.ca

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