

POLICY CATEGORY	OPERATIONS
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OP 02: Privacy Policy

1. Purpose

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 the organization’s mandate as the national accrediting body for continuing pharmacy education and (2) meeting the legal requirements under the *Canada Not-for-Profit Corporations Act*. It is structured to ensure that 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. Scope

This policy applies to any volunteer, staff, or Board member of CCCEP who collects or otherwise has access to business transaction information or private information regarding CCCEP’s volunteers, Board members, providers or any other individual who has cause to provide such information to CCCEP.

3. Definitions

3.1 Business Transaction includes:

- (a) the purchase, sale or other acquisition or disposition of an organization or a part of an organization, or any of its assets;
- (b) the merger or amalgamation of two or more organizations;
- (c) the making of a loan or provision of other financing to an organization or a part of an organization;
- (d) the creating of a charge on, or the taking of a security interest in or a security on, any assets or securities of an organization;
- (e) the lease or licensing of any of an organization’s assets; and
- (f) any other prescribed arrangement between two or more organizations to conduct a business activity.

3.2 Personal Information means information about an identifiable individual.

4. Collection, Use and Retention of Information

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

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- i. To process requests for learning activity and provider accreditation;
- ii. To inform relevant parties of changes to CCCEP policies, processes or procedures that may impact their responsibilities related to CCCEP services;
- iii. To fulfill CCCEP’s corporate legal and responsibilities and obligations;
- iv. To fulfill CCCEP’s responsibilities as an employer and volunteer organization; and
- v. To maintain records to ensure accurate remuneration and reimbursement of expenses.

4.2 CCCEP’s approach to the collection, use, disclosure, and retention of information is as follows:

4.2.1 **Collection:** CCCEP collects business transaction information and 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.

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

4.2.1.2 **Volunteers.** The information collected will be limited to: (1) contact information for purposes of communicating with volunteers; (2) demographic information on education, credentials, work experience, etc. provided when applying to be a volunteer, to ensure that volunteers are representative of the practicing pharmacy community across Canada; (3) information required by the Canada Revenue Agency, and (4) information necessary to facilitate the electronic payments of honorariums.

4.2.1.3 **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.

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

4.2.3 **Retention:**

4.2.3.1 CCCEP will only retain business transaction information or 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.

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4.2.3.1.1 When no longer required to be retained, information will be destroyed in accordance with acceptable destruction standards.

4.2.3.2 CCCEP will store business transaction information or 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.

4.2.3.3 If business transaction information or 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, security measures will be taken to protect unauthorized access to the information, commensurate with the sensitivity of the information.

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

4.4 **Access to records** held by CCCEP

4.4.1 CCCEP promotes the right of access to an individual’s personal information about themselves or any organization’s business transaction information and will provide access to this information upon request..

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

4.5 **Email Communication**

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

4.5.2 CCCEP’s email communication, including the use of group emails (e.g. provider contact list, volunteer reviewers) is conducted by CCCEP employees and generally only to provide information to these parties pertinent to their engagement with CCCEP in the accreditation application or review process.

4.5.3 Any marketing emails that may be undertaken from time to time would be conducted in compliance with the Canadian Anti-Spam Legislation (CASL).

4.6 **Website**

4.6.1 CCCEP allows access and browsing of our website without the disclosure of personal data.

4.6.2 The CCCEP website does not enable our visitors to communicate with other visitors or to post information to be accessed by others, except for the presenter-author-reviewer database.

4.7 **Presenter-Author-Reviewer Database**

4.7.1 CCCEP allows individuals who submitted their name to this database to access their own files electronically for purposes of updating their contact information, experience, education, etc.

4.7.2 CCCEP’s Accredited Providers and Program Providers can access this database to search for potential presenters, authors, or reviewers. They must adhere to the terms of use, which are identified on login. Those terms require providers to only access

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the database, or utilize the information within it, for the purposes for which it was created.

5 Accountability

- 5.1 The Executive Director shall serve as the Chief Privacy Officer for CCCEP.
- 5.2 The Executive Director shall ensure CCCEP’s compliance with all aspects of this policy. .
- 5.3 The Executive Director will report any compliance issues to the Board of Directors within 15 days of becoming aware of an issue.
- 5.4 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.
- 5.5 The Executive Director shall promptly investigate any complaints, in accordance with all relevant legislation. Timelines for resolution should be less than three months, unless there are extraordinary circumstances that require additional time for thorough investigation.
- 5.6 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.
- 5.6.1 Significant harm includes bodily harm, humiliation, damage to reputation or relationships, loss of employment, business or professional opportunities, financial loss, identity theft, negative effects on the credit record and damage to or loss of property.
- 5.6.2 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.

6 Complaints

- 6.1 Individuals who feel their personal information was not handled in accordance with this policy may direct a complaint to the Executive Director.
- 6.1.1 If the complainant feels that the breach of this policy was made by the Executive Director, they should contact the Office Administrator of CCCEP, who will connect

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the complainant via email to the President of CCCEP’s Board of Directors. The President will receive the complaint and initiate an investigation.

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

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

6.4 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.

6.5 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.

7 Contact Information

7.1 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

7.2 To make a complaint regarding CCCEP’s handling of personal information and application of this policy, please contact either the Executive Director or the Office Administrator, in accordance with section 4 of this policy, as follows:

Executive Director
Exec.dir@cccep.ca

Office Administrator
office.admin@cccep.ca

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