

PERSONAL INFORMATION PROTECTION POLICY (PIPA): A GUIDE FOR GRANDIN MANOR OWNERS/RESIDENTS

The Grandin Manor Board of Directors is committed to safeguarding the personal information entrusted to us by owners/residents. We manage personal information in accordance with Alberta's Personal Information Protection Act (PIPA) and other applicable laws. This policy outlines the principles and practices we follow in protecting your personal information.

This policy applies to the Grandin Manor Board of Directors. The policy also applies to any person providing services on our behalf.

A copy of this policy is provided to any owner/resident on request.

What is personal information?

Personal information means information about an identifiable individual. This may include an individual's name, home address and phone number, age, sex, marital or family status, an identifying number, financial information, etc.

What personal information do we collect?

We collect only the personal information that we need for the purposes of providing services to our owners/residents, including personal information needed to:

- Open and manage an account.
- Deliver requested products and services.
- Send out Grandin Manor Condominium Plan No 0023891 information.
- Notify residents/owners of upcoming events of interest.
- Provide building and personal security via use of video surveillance cameras throughout the building complex.

We normally collect owner/resident information directly from the owner/resident. We may collect your information from other persons with your consent or as authorized by law.

We inform our owners/residents, before 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 an owner/resident volunteers information for an obvious purpose.

Consent

We ask for consent to collect, use or disclose owner/resident/visitor personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

In cases where we collected personal information before January 1, 2004, we assume your consent to our use and, where applicable, disclosure 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 the owner/resident to provide their consent orally (in person, by telephone), in writing (by signing a consent form, by checking a box on a form), or electronically (by clicking a button).

An owner/resident may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfill our legal obligations. We will respect your decision, but we may not be able to provide you with certain services if we do not have the necessary personal information.

We may collect, use or disclose owner/resident /visitor personal information without consent only as authorized by law. For example, we may not request consent when the collection, use or disclosure is reasonable for an investigation or legal proceeding, to collect a debt owed to our organization, in an emergency that threatens life, health or safety, or when the personal information is from a public telephone directory.

How do we use and disclose personal information?

We use and disclose owner/resident/visitor personal information only for the purposes for which the information was collected, except as authorized by law. For example, we may use owner/resident contact information to deliver goods. The law also allows us to use that contact information for the purpose of collecting a debt owed to our organization, should that be necessary.

How do we safeguard personal information?

We make every reasonable effort to ensure that owner/resident information is accurate and complete. We rely on our owners/residents 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 let us know and we will correct it on request wherever possible.

In some cases we may ask for a written request for correction.

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

We use appropriate security measures when destroying owner/resident personal information, including shredding paper records and permanently deleting electronic records.

We retain owner/resident personal information only as long as is reasonable to fulfill the purposes for which the information was collected or for legal or business purposes.

Access to records containing personal information

Owners/residents of Grandin Manor have a right of access to their own personal information in a record that is in our custody or under our control, subject to some exceptions. For example, organizations are required under PIPA to refuse to provide access to information that would reveal personal information about another individual. Organizations are authorized under the Act to refuse access to personal

information if disclosure would reveal confidential business information. Access may also be refused if the information is privileged or contained in mediation records.

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 Grandin Manor Board of Directors. 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. For personal information collected before January 2004, if we do not have a record of disclosures, we will provide information about any disclosure of your information that is likely to have occurred.

You may also request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days unless the provincial Privacy Commissioner grants an extension. We may charge a reasonable fee to provide information, but not to make a correction. We will advise you of any fees that may apply before beginning to process your request.

Questions and complaints

If you have a question or concern about any collection, use or disclosure of personal information, or about a request for access to your own personal information, please contact the Grandin Manor Board of Directors in the first instance.

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta

Suite 2460, 801 – 6th Avenue S.W.

Calgary, Alberta T2P 3W2

Phone: (403) 297-2728

Toll free: 1-888-878-4044

E-mail: generalinfo@oipc.ab.ca

Web site: www.oipc.ab.ca

Access and Privacy, Service Alberta

3rd Floor, 10155 – 102 Street NW

Edmonton, Alberta T5J 4L4

Phone: (780) 644-PIPA (7472)

Toll free: 310-0000 first

E-mail: pspinfo@gov.ab.ca

Website: pipa.Alberta.ca

Grandin Manor

Condominium Plan No. 0023891
9741 - 110 Street, Edmonton AB T5K 2V8

Grandin Manor Site Office:
Tel/Fax: (780) 488-4185

References:

Personal Information Protection Act, S.A. 2003, c. P-6.5; Current as of May 1, 2010.

Personal Information Protection Act Regulation (A.R. 366/2003); With amendments up to and including Alberta Regulation 51/2010.

A Guide for Businesses and Organizations on the Personal Information Protection Act, Revised November 2008.

Freedom of Information and Protection of Privacy (FOIP): Guide to Using Surveillance Cameras in Public Areas; Revised June 2004.

Freedom of Information and Protection of Privacy (FOIP): Guidelines for Overt Video Surveillance in the Private Sector, March 2009.

POLICY HISTORY:	
Initial Policy Approved by Grandin Manor Management Board	March 6, 2006
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