PRIVACY POLICY

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Questions relating to this Policy should be directed to the Policy Owner.	

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2. Introduction and Background

YWCA Calgary (YWCA) holds a unique status having been incorporated by a special act of the legislature in 1910, therefore unlike most registered charities and non-profit organizations who are incorporated by Alberta's Societies Act and Religious Societies Act, YWCA is required to comply with Alberta's Personal Information Protection Act (PIPA).

PIPA governs the Collection, Use and Disclosure of Personal Information and extends its provisions to all facets of YWCA's operations.

In addition, when YWCA programs are funded by public bodies, YWCA actively operates under the guidance of Alberta's Protection of Privacy Act (POPA) and Access to Information Act (ATIA). In these cases, while public bodies may not explicitly mandate YWCA to adhere to POPA and ATIA, YWCA may voluntarily extend compliance.

3. Purpose and Scope

YWCA manages all Personal Information in accordance with PIPA and other applicable laws and is committed to Safeguarding the Personal Information entrusted to it; this Policy applies to all Personal Information collected by YWCA.

This Policy is guided by these principles:

1. **Accountability:** An organization is responsible for Personal Information under its control. It must appoint someone to be accountable for its compliance with these principles.
2. **Identifying purposes:** The purposes for which the Personal Information is being Collected must be identified by the organization before or at the time of Collection.
3. **Consent:** The knowledge and permission of the Individual are required for the Collection, Use or Disclosure of Personal Information, except as authorized or required by law.
4. **Limiting Collection:** The Collection of Personal Information must be limited to that which is needed for the purposes identified by the organization. Information must be Collected by fair and lawful means.
5. **Limiting Use, Disclosure and retention:** Unless the Individual Consents otherwise or it is required by law, Personal Information can only be Used or Disclosed for the purposes for which it was Collected. Personal Information must only be kept as long as required to serve those purposes.
6. **Accuracy:** Personal Information must be as correct, complete and as up to date as possible to properly satisfy the purposes for which it is to be Used.
7. **Safeguards:** Personal Information must be protected by appropriate controls relative to the sensitivity of the information.
8. **Openness:** An organization must make detailed information about its policies and practices relating to the management of Personal Information publicly and readily available.
9. **Individual access:** Upon request, an Individual must be informed of the existence, Use and Disclosure of their Personal Information and be given access to that information. An Individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.
10. **Challenging compliance:** An Individual shall be able to challenge an organization's compliance with the above principles. Their challenge should be addressed to the person accountable for the organization's compliance.

For YWCA's privacy practices and procedures, please refer to YWCA Privacy Procedures.

A copy of this Policy is available upon request and is on YWCA's website: https://www.ywcalgary.ca/privacy

4. Definitions

Definitions listed here only apply to this document and YWCA Privacy Procedures, with no implied or intended enterprise-wide use.

Applicant
An Individual or organization on behalf of an Individual who submits a request for access to or correction of their Personal Information.

Authorized Approver
A YWCA Employee who is approved to perform specific actions/tasks related to Personal Information in YWCA's custody and control.

Breach
Unauthorized Collection, Use, Disclosure, destruction, loss, removal, modification or interruption of Personal Information in YWCA's custody and control.

Consent
An Individual's expressed, implied or deemed permission, in writing or orally, to the Collection, Use or Disclosure of their Personal Information.

Collection
The act of gathering, acquiring or obtaining Personal Information about an Individual by any means.

Disclosure
Releasing Personal Information in YWCA's custody and control to the Individual or to a Third Party.

Employee
A person who is considered a member of YWCA's integrated workforce, including a paid employee, unpaid employee/volunteer, student (e.g., practicum student, summer student) and a person under contract**.**

Individual
Any natural person whose Personal Information is Collected, Used or Disclosed by YWCA.

Personal Employee Information
Personal Information of an Employee or former Employee. This includes information necessary for YWCA to establish, manage or terminate an Employee relationship. Such information may include, but is not limited to contact details, employment history, performance evaluations, salary and benefit details.

Personal Information
Information about an identifiable Individual, including but not limited to their name, home address, phone number, age, gender, gender identity, sexual orientation, family status, financial information, education and criminal history.

Reasonable
What a typical, prudent person would consider appropriate and acceptable given the specific circumstances.

Record
Any information under YWCA's custody and control, regardless of its location, form or medium. This includes written, printed, photographic, audio and video, in hard copy, electronic format and any other format.

Safeguards/Safeguarding
The application of administrative (e.g., Oath of Confidentiality), physical (e.g., locks, shredding of documents) and technical (e.g., antivirus software, firewalls, passwords) controls to secure Personal Information.

Safety
Refers to the condition of being safe from experiencing or causing hurt, injury or loss.

Security
The measures YWCA takes to protect Personal Information from unauthorized access, Use, Disclosure or destruction.

Third Party
Any Individual or organization that is not the Individual whose Personal Information is being Collected, Used or Disclosed and is also not the organization that holds that Personal Information.

Use
The utilization of Personal Information for purposes related to YWCA's operations.

YWCA Property
YWCA's owned or leased properties, including the facilities on the properties and the land surrounding the facilities (collectively referred to as YWCA Properties), vehicles, furniture and equipment and software.

5. Policy Statements

5.1. Roles and Responsibilities

YWCA's Privacy Office is responsible for the overall development, implementation and monitoring of YWCA's privacy program; for responding to access and correction to information requests, privacy complaints and Breaches; and to protect the Collection, Use, Disclosure and confidentiality of Personal Information.

YWCA's CFO is ultimately accountable for compliance with YWCA's Privacy Policy and Procedures.

YWCA's Privacy Officer is responsible for:

- Ensuring that YWCA's Privacy Policy and Procedures are implemented throughout the organization;
- The overall management of access to information and the protection of Personal Information in YWCA's custody and control;
- Implementation and monitoring of practices and procedures to ensure compliance with privacy protection measures regarding the Collection, Use, Disclosure, accuracy, retention and Security of Personal Information;
- Providing privacy advisory services and training to Employees; and
- Coordinating any negotiations, mediations, inquiries, investigations and audits with the Office of the Information and Privacy Commissioner of Alberta.

YWCA's Privacy Administrator is responsible for:

- Monitoring privacy correspondence including privacy@ywcalgary.ca and delegating as required; and
- Coordinating access to information and correction requests.

YWCA Leadership is responsible for:

- Managing and securing department specific Personal Information in their custody and control;
- Complying with privacy legislation and this Policy;
- Identifying and providing access to information that is subject to Disclosure without a formal request;
- Locating and retrieving Records in response to requests for access to information;
- Ensuring that the department perspective is considered in any recommendation on a response to information request; and
- Supporting investigations and implementing new procedures or changes as recommended by the Privacy Office.

All YWCA Employees are responsible for:

- Reviewing and complying with YWCA's Privacy Policy and applicable Procedures and privacy legislation;
- Understanding that non-compliance with this Policy by Employees is grounds for remedial proceedings up to and including termination of employment;
- Being aware of and understanding how privacy applies to their current role;
- Complying with Security controls to protect Personal Information in their custody and control;
- Completing privacy training;
- Agreeing to the terms of YWCA's Oath of Confidentiality Agreement;
- Operating on a "need to know" basis; and
- Reporting all violations and privacy Breaches.

YWCA Clients, Customers, Donors, Guests, Members, Renters, etc. may be exposed to information that is confidential and may be required to agree to terms of confidentiality.

5.2. Collection, Use and Disclosure

YWCA Collects, Uses and Discloses Personal Information as authorized or permitted by law, including for purposes that are Reasonable for the delivery of its programs and services, the protection of YWCA Property and the Safety of occupants of YWCA Properties.

YWCA only Collects, Uses and Discloses Personal Information about an Individual from another source and only Discloses Personal Information to another source with the Consent of the Individual, or as authorized by law.

YWCA may Collect, Use and Disclose Personal Information about an Individual without their Consent in certain circumstances, or as authorized or required by law. For example, YWCA may Disclose Personal Information without the Individual's Consent if a Reasonable person would consider that the Use of the information is clearly in the interests of the Individual and Consent of the Individual cannot be obtained in a timely way or the Individual would not Reasonably be expected to withhold Consent. For example, a YWCA Employee may provide the name and medical history of a YWCA client to emergency services who are on site because the client has collapsed and is unconscious.

5.2.1. Service Providers Outside Canada

In the rare event that YWCA uses a service provider outside of Canada, YWCA will ensure that the service provider complies with all YWCA's privacy requirements and

YWCA will provide notice as appropriate, in writing or orally, to Individuals in such cases.

5.2.2. Personal Employee Information

Employment Purposes

YWCA Collects, Uses and Discloses Personal Employee Information solely for the purposes of establishing, managing or terminating an Employee or managing a post Employee relationship, unless required or authorized by law. This includes the Collection, Use and Disclosure of video surveillance for the explicit purpose of the protection of YWCA Property and the Safety of occupants of YWCA Properties. Employment purposes include but are not limited to:

- Employee recruitment, classification, compensation and expense reimbursement;
- Occupational health and safety;
- Performance and conduct evaluation;
- Professional development;
- Payroll and benefits administration.

YWCA will notify Employees of any new employment purpose for which Personal Employee Information is being Collected, Used or Disclosed, or YWCA will obtain Consent.

Reference Requests and Reference Checking

YWCA only Discloses Personal Information about current or former Employees with the Consent of the Employee or in circumstances where Consent is not provided, YWCA only provides employment verification.

Reference checks are only performed with the candidate's consent.

Only Authorized Approvers may provide references or perform reference checks.

5.2.3. Organizations

Organizations in a work relationship with YWCA who may have or require access to Personal Information are required to contractually agree to confidentiality and privacy terms. YWCA may use an agreement, memorandum of understanding, contract or any other written arrangement.

5.2.4. Privacy Impact Assessments

Prior to launching new initiatives or making significant changes to existing programs, procedures or policies that involve Personal Information, YWCA will ensure compliance with legislation and this Policy and ensure the Personal Information will be managed appropriately and responsibly.

5.3. Consent and Notification Standards

Individuals are notified, in writing or orally, as to the purposes for which Personal Information is being Collected, Used or Disclosed and are provided contact information of who can answer questions related to the Collection, Use and Disclosure of the Personal Information. For example, notification is provided during client intake, on signage and on forms.

YWCA obtains Consent, in writing or orally, to Collect, Use or Disclose Personal Information, except where Collection, Use or Disclosure without Consent is authorized or required by law.

Individuals may withdraw or vary their Consent at any time, which may result in YWCA having to vary or terminate services. Individuals are to contact the YWCA program or service directly or the Privacy Office at privacy@ywcalgary.ca regarding questions or changes to Consent.

5.4. Information Handling and Security

5.4.1. Safeguards

YWCA Safeguards Personal Information in a manner appropriate to the sensitivity of the information using administrative, physical and technical controls.

YWCA monitors privacy compliance and makes every Reasonable effort to prevent unauthorized access, Collection, Use, Disclosure and destruction of Personal Information.

Administrative Safeguards applied by YWCA include but are not limited to:

- YWCA's Privacy Policy and Procedures;
- Authorized Approvers are identified to perform specific actions/tasks (e.g., provide references, playing back video surveillance footage);
- Employees are provided training and awareness on privacy and the Safeguarding of information;
- Employees are required to sign an Oath of Confidentiality Agreement;
- Employees are required to sign a Work from Home Agreement;
- Organizations in a work relationship with YWCA comply with privacy requirements;
- Individuals are required to report privacy Breaches to the Privacy Office;
- Whiteboards are cleaned of information at the end of a meeting;
- Confidential, restricted or sensitive documents are sealed, marked as confidential and directed to the attention of the authorized recipient when transmitted by mail or courier; and
- Confidentiality notification is included in YWCA emails.

Physical Safeguards applied by YWCA include but are not limited to:

- Employee identification by nametag and access card;
- Hard copies of Records are held and stored in an organized, safe and secure manner (e.g., locked filing cabinets);
- Records are not left on-site or off-site in areas accessible by unauthorized persons;
- Records and equipment holding Records are protected when taken off-site (e.g., locked in vehicle);
- Confidential information is not viewable by unauthorized Individuals (e.g., privacy screens installed);
- Facility spaces have controlled access using locks and access cards programmed for the specific needs of the Individual;
- Distribution of keys or pass codes is controlled;
- Individuals are accompanied to private or semi-private areas;
- Servers and equipment are secured in locked cabinets or rooms;
- Copiers/printers are located in secure areas and use secure print; and
- Hard copies of confidential information are shredded.

Technical Safeguards applied by YWCA include but are not limited to:

- Firewalls, intrusion detection software and other technical controls are in place to protect YWCA's IT network;
- System users are assigned a unique identifier that restricts access to data based on roles and need to know;
- Access to information systems is controlled and password protected;
- Computers manually or automatically log out when Employee is away from device;
- Confidential information is transmitted using appropriate Security measures (e.g., encryption, authentication, password protection);
- Bring Your Own Device (BYOD) requirements are in place;
- Systems are monitored to detect unauthorized access and prevent modification or misuse;
- Event logs are monitored; and
- Electronic Records are held and stored in an organized, safe and secure manner (e.g., password protected).

5.4.2. Authorized Approvers

Only YWCA Authorized Approvers are eligible to perform certain actions/tasks related to the Collection, Use and Disclosure of Personal Information in YWCA's custody and control (e.g., providing references, playing back video surveillance footage). Where possible, controls are in place to restrict unauthorized access.

5.4.3. Record Management and Retention

YWCA adheres to legislation, as well as funder agreements, related to the retention of Records and only retains Personal Information for as long as is Reasonable for legal and business purposes.

Records are securely destroyed when they no longer need to be retained. YWCA does not apply a uniform retention period to all Records but instead evaluates each Record based on specific business, legal and contractual requirements.

5.5. Privacy Breach Response

All Breaches of Personal Information in YWCA's custody and control must be reported to YWCA's Privacy Office. Immediate steps will be taken to contain the Breach and YWCA will investigate, notify and implement (as appropriate or required) preventive measures.

YWCA recognises that a Breach may be accidental or the result of a deliberate act.

YWCA will protect the reporter's privacy, as much as possible, within the boundaries of the investigation and applicable privacy law.

Ways to report privacy Breaches:

- online form at https://interceptum.com/s/en/Privacy_Breach_Report;
- via email to privacy@ywcalgary.ca;
- in-person at YWCA Hub, 1715 17 Ave SE; or
- via phone at 403-263-1550.

5.6. Right to Access and Correction

5.6.1. Duty to Assist

YWCA acknowledges its duty to assist Applicants wishing to access and correct their Record, including the need to complete a thorough search for requested Records and the legal requirement to not alter, falsify, conceal or destroy Records to evade a request.

YWCA will provide an explanation in responses to requests when it is Reasonable to do so or is deemed necessary or appropriate.

5.6.2. Right to Access

Individuals have a right to access their Record of Personal Information that is in the custody and control of YWCA, subject to some exceptions as required by law. Examples of exceptions include but are not limited to:

a. YWCA shall not provide access to Personal Information if:
   - Disclosure of the Personal Information could Reasonably be expected to threaten the life or Safety of another Individual;
   - Disclosure would reveal Personal Information about another Individual; or
   - The Personal Information would reveal the identity of an Individual who has in confidence provided an opinion about another Individual and the Individual providing the opinion does not Consent to Disclosure of their identity.

b. YWCA may refuse to provide access to Personal Information if:
   - The Personal Information is protected by legal privilege;
   - Disclosure would reveal confidential information that is of a commercial nature, and it is not unreasonable to withhold it; or
   - The information was collected for an investigation or legal proceeding.

5.6.3. Requests for Access

Requests for Personal Information are to be submitted through the YWCA Privacy Office, and YWCA will confirm an Applicant's identity.

Requests made by a Third Party, such as legal counsel, are required to provide a release of information or other appropriate documentation (e.g., court order) before YWCA will Disclose the requested Personal Information.

YWCA responds to requests within 30 calendar days, unless an extension is granted.

It is preferred that requests are submitted online to ensure all required information is captured (and to avoid any delay in the process) at https://interceptum.com/s/en/Request_for_Information_and_Correction. Alternatively, requests can be submitted via email to privacy@ywcalgary.ca.

5.6.4. Requests for Correction

YWCA makes every Reasonable effort to ensure that Personal Information in its custody and control is accurate and complete.

Individuals may register disagreement with the accuracy of their Personal Information on file and request correction. YWCA will correct information as soon as Reasonably possible. If YWCA determines not to make a correction, YWCA will annotate the Personal Information under its control with the correction that was

requested but not made. Applicants will be notified following a correction or with an explanation if YWCA determines not to make a correction.

Where YWCA has Disclosed incorrect information to other organizations, YWCA will send notification with the corrected information if it is Reasonable to do so. Conversely, YWCA will immediately correct Personal Information in its custody if notified by another organization.

It is preferred that requests are submitted online to ensure all required information is captured (and to avoid any delay in the process) at https://interceptum.com/s/en/Request_for_Information_and_Correction. Alternatively, requests can be submitted via email to privacy@ywcalgary.ca.

5.6.5. Right to Complain

Individuals have a right to complain if they are not satisfied with YWCA's response to an access or correction request. Individuals should first contact YWCA's Privacy Office at privacy@ywcalgary.ca. The Individual can take their complaint to the Office of the Information and Privacy Commissioner of Alberta if the issue is not resolved to their satisfaction.

5.6.6. Fees

YWCA may charge a Reasonable fee to provide Personal Information but does not charge to make corrections or when the request is for Personal Employee Information.

Where a fee is to be charged, YWCA provides an estimate and may charge a 50% deposit.

6. Contact

6.1. Privacy Inquiries

YWCA Calgary
Privacy Office
1715 17 Ave SE, Calgary, AB T2G 5J1
403-263-1550
privacy@ywcalgary.ca

YWCA Calgary website:
https://www.ywcalgary.ca/privacy

Requests for Information
https://interceptum.com/s/en/Request_for_Information_and_Correction

Privacy Breach Report
https://interceptum.com/s/en/Privacy_Breach_Report

6.2. Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta
Suite 2460, 801 6 Avenue SW, Calgary, AB, T2P 3W2
Phone: 403-297-2728; Toll Free: 1-888-878-4044
Email: generalinfo@oipc.ab.ca
Website: www.oipc.ab.ca

7. Relevant Documents

7.1. Relevant Legislation

- Alberta's Personal Information Protection Act (PIPA)
- Alberta's Protection of Privacy Act (POPA)
- Alberta's Access to Information Act (ATIA)

7.2. Other relevant YWCA Policies and Procedures

- Privacy Procedures
- Oath of Confidentiality
- Code of Conduct
- Work from Home Agreement
- Acceptable Use Policy
- Bring Your Own Device (BYOD) requirements

Revisions Record

Revision	Pages Affected	Description	Date
1	2 Introduction and Background And 7.1 Relevant Legislation	Replaced references to FOIP with new Alberta legislation Protection of Privacy Act (POPA) and Access to Information Act (ATIA).	Nov 2025