



OUR COMMITMENT TO PRIVACY

The **ENVIRONMENTAL SERVICES ASSOCIATION OF ALBERTA** (“ESAA”) is committed to maintaining the security, confidentiality and privacy of your personal information. This Privacy Policy documents our on-going commitment to you and has been developed in compliance with the Alberta *Personal Information Protection Act*.

SCOPE OF POLICY

This Policy applies to the ESAA. This Policy addresses personal information about individuals and does not apply to the information collected, used or disclosed with respect to corporate or commercial entities.

This Policy does not impose any limits on the collection, use or disclosure of the following information by the ESAA:

- your business contact information; and
- certain publicly available information.

ACCOUNTABILITY

ESAA has designated a Privacy Officer who is responsible for ESAA’s compliance with this Policy. The Privacy Officer may be contacted as described below.

PURPOSES

When collecting information, ESAA will state the purpose of collection and will provide, on request, contact information for the Privacy Officer who can answer questions about the collection.

ESAA collects your personal information for the following reasons:

- (a) to providing educational and informational programs regarding environmental management practices;
- (b) to providing and developing business contact information;
- (c) to administrating codes of ethics for members of ESAA;
- (d) to publishing and distributing materials related to environmental products and services and other educational information;
- (e) to collecting information for surveys relating to environmental products and services;
- (f) to complying with legal and regulatory requirements.

The above collections, uses and disclosures are a necessary part of your relationship with ESAA.

Other uses:

- (a) Members may communicate with you to determine whether you require additional services.

You may instruct ESAA to refrain from using or sharing information in the way described above under “other uses” at any time by providing written notification to ESAA Privacy Officer. ESAA acknowledges that the sharing of information in the this way described above under “other uses” is at your option and you will not be refused services merely because you advised ESAA to stop using or sharing information in this way.

When personal information that has been collected is to be used for a purpose not previously identified, the new purpose shall be identified prior to use and consent for same shall be obtained from you unless the use is authorized or required by law.

CONSENT

ESAA will obtain your consent to collect, use or disclose personal information except where ESAA is authorized or required by law to do so without consent. For example, ESAA may collect, use or disclose personal information without your knowledge or consent where:

- the information is publicly available, as defined by statute or regulation;
- ESAA is obtaining legal advice; or
- ESAA reasonably expects that obtaining consent would compromise an investigation or proceeding.

Other exceptions may apply.

Your consent can be express, implied or given through an authorized representative such as a lawyer, agent or broker.

Consent may be provided orally, in writing, electronically, through inaction (such as when you fail to notify ESAA that you do not wish your personal information collected/used/disclosed for various purposes after you have received notice of those purposes) or otherwise.

You may withdraw consent at any time, subject to legal, contractual and other restrictions, provided that you give reasonable notice of withdrawal of consent to ESAA. On receipt of notice of withdrawal of consent, ESAA will inform you of the likely consequences of the withdrawal of consent, which may include the inability of ESAA to provide certain services for which that information is necessary.

LIMITS ON COLLECTION OF PERSONAL INFORMATION

ESAA will not collect information indiscriminately and will limit collection of information to that which is reasonable and necessary to provide services and which is reasonable and necessary for the purposes consented to by you. ESAA will also collect information as authorized by law.

LIMITS FOR USING, DISCLOSING AND RETAINING PERSONAL INFORMATION

Your personal information will only be used or disclosed for the purposes set out above and as authorized by law.

ESAA will keep personal information used to make a decision affecting you for no longer than one year.

ESAA will destroy, erase or make anonymous documents or other records containing personal information as soon as it is reasonable to assume that the original purpose is no longer being served by retention of the information and retention is no longer necessary for legal or business purposes.

ESAA will take due care when destroying personal information so as to prevent unauthorized access to the information.

ACCURACY

ESAA will make a reasonable effort to ensure that personal information it is using or disclosing is accurate and complete.

If you demonstrate the inaccuracy or incompleteness of personal information, ESAA will amend the information as required. If appropriate, ESAA will send the amended information to third parties to whom the information has been disclosed.

When a challenge regarding the accuracy of personal information is not resolved to your satisfaction, ESAA will annotate the personal information under its control with a note that the correction was requested but not made.

SAFEGUARDING PERSONAL INFORMATION

ESAA protects the personal information in its custody or control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

ESAA will take reasonable steps, through contractual or other reasonable means, to ensure that a comparable level of personal information protection is implemented by the suppliers and agents who assist in providing services. Some specific safeguards include:

- physical measures such as locked filing cabinets;
- organizational measures such as restricting employee access to files and databases as appropriate;
- electronic measures such as passwords; and
- investigative measures where ESAA has reasonable grounds to believe that personal information is being inappropriately collected, used or disclosed.

Note that confidentiality and security are not assured when information is transmitted through e-mail or other wireless communication.

PROVIDING ACCESS

You have a right to access your personal information held by ESAA.

Upon written request and authentication of your identity, ESAA will provide you with your personal information under its control, information about the ways in which your information is being used and a description of the individuals and organizations to whom that information has been disclosed. ESAA may charge a reasonable fee for doing so.

ESAA will make the information available within 45 days or provide written notice where additional time is required to fulfil the request.

In some situations, ESAA may not be able to provide access to certain personal information (e.g., if disclosure would reveal personal information about another individual, the personal information is protected by solicitor/client privilege, the information was collected for the purposes of an investigation or where disclosure of the information would reveal confidential commercial information that could harm the competitive position of ESAA). ESAA may also be prevented by law from providing access to certain personal information.

Where an access request is refused, ESAA will notify you in writing, document the reasons for refusal and outline further steps which are available to you.

COMPLAINTS

ESAA will, on request, provide information regarding its complaint procedures.

Any inquiries, complaints or questions regarding this Policy should be directed in writing to ESAA Privacy Officer.

Contact Information:

Privacy Officer
1710, 10303 Jasper Avenue
Edmonton, AB T5J 3N6
Phone: (780) 429 6363 (ext. 223)
Facsimile: (780) 429 4249
E-mail: privacy@esaa.org