

PHARMACISTS FOR A SMOKE FREE CANADA PRIVACY POLICY

Purpose of the Policy

Pharmacists for a Smoke Free Canada (“**PSFC**” or “**we**”) may collect personal information in the course of its activities. PSFC is committed to ensuring compliance with the Canada *Personal Information Protection and Electronic Documents Act* (“**PIPEDA**”) and all other applicable privacy legislation.

The purpose of this Privacy Policy is to establish rules that govern the collection, use, disclosure, and retention of personal information by PSFC in a manner that recognizes the need to balance an individual’s right of privacy with respect to personal information and PSFC’s need to collect, use, and/or disclose that information in order to fulfill its purposes.

This Policy is expected to change as the body of knowledge in this area grows and as the environment within which PSFC operates evolves. PSFC will post and explain any changes to this Privacy Policy as soon as they go into effect.

By providing us with your Personal Information, you are consenting to the collection, use, disclosure, and retention, by us, of your Personal Information, as set out in this Policy.

Scope

All employees, directors, officers, representatives, consultants, contractors, agents, and other persons who act or provide services on behalf of PSFC shall be subject to this Policy.

Definitions

Personal Information – Personal information is any factual or subjective information, recorded or not, about an identifiable person (e.g. age, name, address, income, phone number, etc.). Personal information does not include the name, title, or business address or telephone number of an employee of an organization.

Policy

PSFC is committed to ensuring that all personal information gathered by PSFC is kept confidential and is treated in a manner that a reasonable person would consider appropriate in the circumstances.

All personal information under the control or custody of PSFC shall be regarded as confidential and available only to authorized users. Subject to specific limitations and exceptions, individuals (or their legal representatives) may access their own personal information contained in records under the custody or control of PSFC following the process outline in this Policy.

PSFC’s websites were not designed and are not directed to children eighteen (18) years of age or younger. Committed to protecting children’s privacy in an on-line environment, we do not intentionally collect or maintain Personal Information provided by children.

The following are PSFC's key privacy principles, codified as Schedule 1 of PIPEDA:

1. Accountability for Personal Information

PSFC shall be responsible for the personal information in its custody or control, including information that has been transferred to a third party for processing. PSFC shall use contractual or other means to ensure the protection of any information in the possession of a third party. PSFC's employees and agents shall be responsible for any personal information that they have in their possession at all times.

PSFC has a Privacy Officer that is committed to ensuring PSFC's compliance with PIPEDA.

2. Identifying Purposes for Collecting Personal Information

PSFC shall collect personal information for the purpose of communicating with pharmacists, students, members of the public, and other individuals who indicate an interest in the activities of PSFC.

When personal information is required to be collected from an individual, PSFC will identify and document the purpose for which it is being collected, will explain how it will be used, and will obtain the individual's consent to collect, use, and disclose it. PSFC will use reasonable efforts to ensure that the individual reasonably understands how the information will be used and disclosed.

If personal information that has been collected is required to be used for a different purpose than originally disclosed, the new purpose will be identified to the relevant individual prior to use. Unless the new purpose is required or permitted by law, such individual's consent will be obtained before the information is used for that new purpose.

3. Consent for Collection, Use, and Disclosure of Personal Information

Consent is required for the collection of personal information and the use and disclosure of such information. PSFC shall seek consent for the use and disclosure of personal information either prior to or at the time of collection.

In determining the form of consent to collect, use, or disclose personal information (implied/express, verbal/written), PSFC will take into account the sensitivity of the information and applicable legal requirements. Regardless of the form of consent given, PSFC will ensure that the consent is knowledgeable, voluntary, related to the information in question, and given by the relevant individual.

Consent may be withdrawn at any time, subject to legal restrictions and reasonable notice. If an individual would like to withdraw his/her consent to PSFC's use of his/her personal information, such individual can do so by contacting media@psfcnetwork.com. A withdrawal of consent will not apply to a collection, use, or disclosure that had occurred prior to receiving the notice of withdrawal.

4. Limiting Collection of Personal Information

The collection, use, and disclosure of personal information will be limited to that which is necessary to fulfill the purposes identified.

5. Limiting Use, Disclosure, and Retention of Personal Information

PSFC will only use personal information for the purposes for which consent has been given.

PSFC may provide personal information to other parties:

- when consent to do so has been provided; and/or
- when PSFC is required or permitted to do so by law.

Personal information will be kept until the stated purpose is complete and the relevant individual has exhausted any legal recourse regarding an access request. At such time, or at the end of the legislatively required retention period, whichever is longer, the personal information will be disposed of by means of shredding or another secure disposal method, with care taken to prevent unauthorized parties from gaining access to the information.

6. Ensuring Accuracy

While PSFC will use reasonable efforts to ensure that an individual's personal information is as accurate, complete, and up-to-date as necessary for the purposes for which PSFC uses the information, ultimately, an individual will be responsible for ensuring that PSFC has his/her current and complete personal information in PSFC's records. PSFC will not routinely update personal information, unless such a process is necessary to fulfill the purposes for which the information was collected.

7. Use of Safeguards to Protect Information

PSFC will use appropriate procedures and security measures to protect personal information in its custody or control against theft, loss, and unauthorized use, disclosure, modification, or disposal, regardless of the format in which the information is held.

The methods of protection may include the following:

- locked filing cabinets;
- restricted access to offices;
- alarm system;
- confidentiality agreements with staff and volunteers; and/or
- use of passwords, access controls, and encryption.

The personal information collected by PSFC may be shared, stored, or accessed in Canada or in other countries where PSFC maintains an office, conducts business, and/or has internet facilities.

If personal information is stolen, lost, or accessed by an unauthorized person, PSFC will notify the relevant individual(s) and/or other third parties (such as the Privacy Commissioner) at the first reasonable opportunity, if required to do so by applicable law.

PSFC does not sell, rent, or lease personal information to third parties.

8. Openness About Privacy Policy

This Privacy Policy will be available on the Pharmacists for a Smoke Free Canada website

<https://psfcnetwork.com>

9. Individual Access to Personal Information

Upon written request, and proof of identification, PSFC will inform an individual whether or not it holds personal information about the individual. PSFC will allow the individual to access this information in accordance with applicable legislation. Certain situations will prevent PSFC from providing access to personal information, including for legal, confidentiality, or security reasons; in such situations, PSFC will give a written notice to the individual that states that the request for access is being refused, provides reasons for the refusal, and informs the individual that he/she is entitled to make a complaint about the refusal to the Office of the Privacy Commissioner of Canada. PSFC will respond to a request for access within thirty (30) calendar days of receipt of the request, unless extensions are permitted under law and PSFC has informed the individual of the length and reason for the extension.

If an individual informs PSFC about the inaccuracy or incompleteness of his/her personal information, PSFC will respond to the correction request, with the amendments, within thirty (30) days of receiving the request, unless extensions are permitted under law and PSFC has informed the individual of the length and reason for the extension.

In certain circumstances, PSFC will not correct a record of personal information, if prohibited from doing so under law. If a correction is refused, PSFC will inform the individual of the refusal, the reasons for the refusal, the individual's right to file a complaint regarding the refusal to the Office of the Privacy Commissioner of Canada, and the right of the individual to attach a statement of disagreement to PSFC's records (so that any other organization that has access to the Information can view the statement).

10. Challenging Compliance

PSFC's Privacy Officer (Ms. Jane Ling) can be contacted at: jling@psfcnetwork.com

PSFC's Privacy Officer is available to answer any questions an individual may have about PSFC's collection, use, disclosure, and retention of personal information, or to register a complaint. An individual whose personal information is held by PSFC has several other avenues of recourse, including registering a complaint with the Office of the Privacy Commissioner of Canada. PSFC is committed to investigating all complaints and taking appropriate action.

11. Websites

PSFC does not guarantee, and is not responsible for, the content or privacy policies of the websites to which PSFC's website (where this Policy is available) may link.