

# CCI New Brunswick Privacy Policy

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The Canadian Condominium Institute, ("CCI"), New Brunswick Chapter, provides a broad range of services to our members. We have a longstanding policy of protecting the privacy of our members in the course of providing services to them. Our relationship with our members is based upon trust and maintaining member privacy is, therefore, given the utmost priority.

The CCI New Brunswick Privacy Policy is a formal statement of principles and guidelines that we have adopted for the protection of personal information, ("PI") we may collect for or on behalf of our members. Our objective in developing this Privacy Policy is to promote responsible practices in the management of PI in accordance with the provisions of the PI Protection and Electronic Documents Act, ("PIPEDA"). This policy is organized according to the principles of the Canadian Standard's Associations Model Code, which forms the basis of that law.

## **1. Privacy Policy**

The CCI New Brunswick Chapter recognizes the importance of privacy and the sensitivity of PI. We understand that we have an obligation to keep confidential all PI we receive from our members. We are committed to protecting any PI we hold. This Privacy Policy outlines how we manage your PI and safeguard your privacy

## **2. Your Privacy Rights**

From January 1, 2004, all organizations engaged in commercial activities must comply with the PI Protection and Electronic Documents Act and the Canadian Standards Association Model Code for the Protection of PI which it incorporates. These obligations extend to the CCI National Office. The Act gives you rights concerning the privacy of your PI.

CCI New Brunswick is responsible for the PI we collect and hold. To ensure this accountability, we have developed this policy, and trained our directors and support staff about our policies and practices.

## **3. Why Does CCI New Brunswick Need PI**

CCI New Brunswick provides educational services and products to a wide range of members. We require some PI to provide these services to you; create and maintain membership lists; and produce direct marketing materials concerning our services and developments in the condominium community.

## **4. What PI do we collect?**

PI is any information that identifies you, or by which your identity could be deduced. If we did not collect and use your PI we could not provide you with our services. PI that we collect includes, but is not necessarily limited to, the following:

- your name, home address, and home telephone and/or cell phone numbers;
- your e-mail address;
- your condominium name and address;
- credit card information;
- management firm, lawyer and auditor;
- banking information, (eg. from your membership fee cheques);

## **5. How do we collect your PI?**

We collect information only by lawful and fair means and not in an unreasonably intrusive way. Wherever possible we collect your PI directly from you at the start of your membership and through annual renewals. Additional information may be obtained through course registration or through questionnaires on issues relating to condominium living.

Sometimes we may obtain information about you from other sources, for example:

- your management firm;
- from a government agency or registry;
- from the National offices of CCI.

## **6. Consent**

In most cases, we shall ask you to specifically consent, if we collect, use, or disclose your PI. Normally, we ask for your consent in writing but in some circumstances, we may accept your oral consent. Sometimes, your consent may be implied through your conduct with us, for example when you provide us with PI when completing your membership form or annual renewal.

## **7. Use of Your Information**

We use your PI to provide our services to you and to include you in any direct mailings of information relating to condominium living that we believe would be of some interest to you. We also will use it for marketing activities such as notification of up-coming meetings, courses, seminars, conferences and CCI products. If you tell us that you no longer wish to receive information about our services, seminars or about new developments in the law, we will not send any further material.

CCI New Brunswick Office does not disclose your PI to any third party, (other than to specific CCI chapters) to enable them to market their products and services. For example, we do not provide our client mailing lists to other organizations or businesses. On occasion other organizations, such as the Association of Condominium Managers of Ontario, ("ACMO") will forward complimentary publications to us to distribute to our members but they do not receive our membership list.

## **8. Disclosure of your PI**

Under certain circumstances, CCI New Brunswick will disclose your PI:

- when we are required or authorized by law to do so, for example, if a court issues a subpoena;
- when you have consented to the disclosure;
- to update National offices with your membership information;
- where it is necessary to establish or collect membership fees;
- if we engage a third party to provide administrative services to us (such as a mailing service or archival file storage) and the third party will be bound by our Privacy Policy;
- if we retain agents or consultants to assist us in completing research relating to CCI or condominium living;
- if the information is already publicly known.

In these instances, we will only disclose such PI as is required in the circumstances.

## 9. Updating Your Information

Since we use your PI to provide our services to you, it is important that the information be accurate and up-to-date.

If during the course of your membership any of your PI changes, please inform us so that we can make any necessary changes.

## 10. Is My PI Secure?

CCI New Brunswick Chapter takes all reasonable precautions to ensure that your PI is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect your information are:

- premises security;
- employee training in the storage, safe guarding and use of PI;
- restricted file access to PI;
- deploying technological safeguards such as security software and firewalls to prevent hacking or unauthorized computer access; and
- internal password and security policies.

If we use the services of any third parties to process or store PI, we will enter into an agreement which requires them to protect this PI in a manner acceptable to us. In entering into these agreements, we do not transfer any interest in this PI to them. This is done to ensure that the PI delivered to third parties is maintained at a level equivalent to that provided for under this Privacy Policy.

## 11. Access to Your PI

You may ask for access to any PI we hold about you.

Summary information is available on request. More detailed requests which require archive or other retrieval costs may be subject to a reasonable fee.

We also reserve the right to confirm the identity of the person seeking access to PI before complying with any access requests. Please submit your access request in writing or e-mail to our privacy officer as identified in paragraph 18.

## 12. Correcting Errors

If CCI New Brunswick Office holds information about you and you can establish that it is not accurate, complete and up-to-date, and we will take reasonable steps to correct it.

## 13. Can I be Denied Access to My PI?

In most cases, a member of a CCI chapter will have access to the PI we store about you. However, there may be rare occasions when your rights to access your PI are denied, for example the PIPEDA indicates that:

- your rights to access your PI are not absolute;
- denial of access is required or authorized by law;
- when granting you access would have an unreasonable impact on other people's privacy;
- when to do so would prejudice negotiations with you;
- to protect CCI New Brunswick and CCI National Office rights and property; or
- where the request is frivolous or vexatious.

If we deny your request for access to, or refuse a request to correct information, we will endeavor to explain why.

#### **14. Can I request anonymity.**

Whenever it is legal and practicable, we may offer the opportunity to deal with general inquiries without providing your name (for example, by accessing general information on our website).

#### **15. Credit Bureaus**

On occasion we may request information about you from the files of consumer agencies or file complaints with those agencies, such as where a member has failed to pay a debt owed to us.

#### **16. Communicating with us by E-Mail and/or Fax**

You should be aware that e-mail and fax are not a 100% secure medium, and you should be aware of this when contacting us to send personal or confidential information or requesting us to respond to you by e-mail.

#### **17. Changes to this Privacy Policy**

Since CCI New Brunswick Chapter regularly reviews all of its policies and procedures, we may change our Privacy Policy from time to time. These changes will be posted to our website as soon as is practical.

#### **18. Requests for Information Access and/or Corrections**

If you have any questions, or wish to access your PI, please write to our Privacy Officer:

CCI - New Brunswick Chapter  
PO Box 363, Station A  
Fredericton, NB E3B 4Z9  
Email: [ccinewbrunswick@cci.ca](mailto:ccinewbrunswick@cci.ca)

If you are not satisfied with our response, the Privacy Commissioner of Canada can be reached at:

112 Kent Street  
Ottawa Ontario, K1A 1H3  
1-800-282-1376.

We may seek external advice, where appropriate, before providing a final response to individual complaints.

#### **19. Employment Inquiries**

If you apply to CCI New Brunswick Chapter for a job, we need to consider your PI, as part of our review process. We normally retain information from candidates after a decision has been made, unless you ask us not to retain the information. If we offer you a job, which you accept, the information will be retained in accordance with our privacy procedures for employee records.

#### **20. Web Site**

Our website contains links to other sites, which are not governed by this Privacy Policy.

On our website, like most other commercial websites, we may monitor traffic patterns, site usage and related site information in order to optimize our web service. We may provide

aggregated information to third parties, but these statistics do not include any identifiable PI.

Thank you for taking the time to review our Privacy Policy.

## CCI New Brunswick Chapter

**"The Voice of Condominium"**