



## PERSONAL INFORMATION PROTECTION POLICIES

1. **Accountability:** Red Leaf Student Programs (RL) is accountable for the personal information it collects and shares with other organizations. Marylou Heenan, General Manager, is the Privacy Officer for RL, and can be reached at [mheenan@red-leaf.com](mailto:mheenan@red-leaf.com)
2. **Identification of purpose:** RL identifies to employees, independent contractors, host families and students the purposes for which their personal information is needed and how it will be used and disclosed. If RL wishes to use such information for a new purpose, those concerned will be contacted and their consent obtained.
3. **Consent:** RL obtains consent for collection, use and disclosure of information at the time information is collected as well as when a new use is identified. Where consent to use and/or disclose the information is a necessary condition, the individual is so informed.
4. **Limits on collection:** RL collects only personal information for purposes that a reasonable person would consider appropriate in the circumstances.
5. **Limits on use, disclosure and retention:** RL uses or discloses personal information only for the purpose(s) for which it was collected, unless the individual consents to the new purpose. RL keeps personal information only as long as necessary to fulfill the purpose(s) for which it was collected.. RL destroys personal information as soon as it is no longer serving the purposes for which it was collected and is no longer necessary for a legal or business purpose.
6. **Accuracy:** RL makes reasonable efforts to ensure that the personal information collected is accurate and complete.
7. **Appropriate safeguards:** RL makes reasonable security arrangements to protect personal information collected, including physical measures, technical tools, and organizational controls where appropriate. RL safeguards personal information from unauthorized access, collection, use, disclosure, copying, modification or disposal by both individuals inside and outside the organization.

8. Openness: RL makes available on request information explaining our personal information policies and practices; name, title and contact information of the person responsible for such policies and practices; name, title and contact information of the person who can answer questions about our purposes for collecting personal information, and the procedures for gaining access to an individual's personal information as well as making a complaint about our personal information practices.
  
9. Access by individuals:
  - a) Upon request, RL provides applicants with access to their personal information, an explanation of how it has been used, and a list of any individuals or organizations to whom their personal information has been disclosed. This information is provided within 30 days of the request. If any part of the requested information is refused, RL provides the applicant with reasons and provisions of the ACT\* on which the refusal is based, and information on how to request a review by the Information and Privacy Commissioner.
  
  - b) Upon request, RL corrects personal information that is incorrect or incomplete, sending a copy of the corrected personal information to each organization to which the incorrect or incomplete information was disclosed in the past year.
  
10. Recourse: RL develops and implements simple and easily accessible complaint handling procedures, informs complainants of avenues of recourse, investigates all complaints received, and takes appropriate measures to correct information handling practices and policies.

\* ACT: **Personal Information Protection and Electronic Documents Act (PIPEDA) of Canada**