



# CPA NL Privacy Policy

## Who is CPA NL?

For purposes of this Privacy Policy, "CPA NL" means the not-for-profit organization Chartered Professional Accountants of Newfoundland and Labrador as it is incorporated under The *Chartered Professional Accountants Act of Newfoundland and Labrador*, and also includes the Chartered Professional Accountants' Education Foundation of Newfoundland, Inc a registered charity under the Income Tax Act. Administrative support and staff for the Foundation are provided by CPA NL, and as a result, the Foundation follows CPA NL's privacy policy.

## CPA NL's Policy on Privacy of Member Personal Information

CPA NL is committed to protecting the privacy and security of your personal information obtained by reason of your relationship with CPA NL. This policy explains the types of personal information we collect, how it is used, and the steps we take to ensure your personal information is handled appropriately.

CPA NL collects personal information about its members with their consent, demonstrated by their completion of its membership application form. Personal information does not include contact and employment information, which is required by CPA NL for it to communicate with and inform its members. The personal information collected enables, and is limited in purpose to, the fulfillment of CPA NL's objectives. These include facilitating a collaborative environment for the increase of skills, proficiency and efficiencies among its members.

There may be circumstances where CPA NL may be under a legal duty to disclose personal information without member consent. If it is necessary for CPA NL to disclose personal information, it will not disclose any more information than is legally required.

CPA NL will retain personal information only for as long as it is required. While personal information is in CPA NL's possession CPA NL will endeavor to maintain adequate physical, procedural and technical security with respect to its offices and information storage facilities so as to prevent any unauthorized access, disclosure, copying, use or modification of member information.

This privacy policy applies to all member personal information in CPA NL's possession, including personal information collected prior to this policy's enactment.

Our policies and practices have been designed to comply with the Personal Information Protection and Electronic Documents Act (PIPEDA) and corresponding provincial privacy acts.

## What is personal information?

Personal information is information that refers to an individual specifically and is recorded in any form. Personal information includes such things as gender, age, income, date of birth,

ethnic origin, medical records and financial records. Information about individuals contained in the following documents is not considered personal information:

- public telephone directories, where the CPA NL member can refuse to be listed
- professional and business directories available to CPA NL members
- certain public registries and court records
- certain other publicly available printed and electronic publications

Our commitment to your privacy is governed by the following privacy principles:

*We are accountable to you*

CPA NL is responsible for all personal information under its control, including any personal information that is transferred to third parties for processing, storage or other purposes. Our employees are accountable for compliance with these privacy and security principles.

*We let you know why we collect your personal information*

CPA NL identifies the purpose for which your personal information is collected. We do this before or at the time the information is actually being collected.

*We obtain your consent to collect, use or disclose your personal information*

CPA NL obtains your consent to collect, use or disclose personal information. The method of obtaining consent is by membership application and member data change forms. CPA NL will obtain your express consent (verbal, written or electronic agreement) to collect, use or disclose sensitive personal information such as personal financial information. CPA NL will use implied consent to collect, use or disclose your personal information where one or more of the following apply

- a customer relationship already exists
- express consent has previously been given
- where the purpose of using the personal information is reasonably apparent to you

You can change your consent preferences at any time by submitting in writing your request to the CPA NL Office. You may also withdraw your consent at any time subject to applicable legal or contractual restrictions and reasonable notice. However, in either case, this may severely limit our ability to provide products and services to you.

*We limit collection of your personal information*

CPA NL collects only the information required to provide products and services to you. If the personal information we require is collected for a reason other than to provide products and services, your consent will be obtained before or at the time the information is collected. CPA NL will collect personal information only by clear, fair and lawful means.

Examples of why we collect personal information include:

- communicating with you generally
- processing your applications
- processing and keeping track of transactions and reporting back to you
- protecting against fraud or error
- providing product and services requested by you
- recommending products and services that CPA NL believes will be of interest and provide value to you
- to comply with legal and governmental requirements

*We limit use, disclosure and retention of your personal information*

CPA NL uses and discloses your personal information only for the purposes it was collected. CPA NL does not sell or rent personal information to any organization or person for any reason. CPA NL retains your personal information as long as it is required for our business relationship or as required by federal and provincial laws.

In order to meet its regulatory and other responsibilities, CPA NL does exchange the minimum amount of membership information on an as needed basis, including both personal and other information, with the following affiliated organizations:

- The Chartered Professional Accountants of Canada (CPA Canada)
- The Chartered Professional Accountants Atlantic School of Business (CPA ASB); and
- Other Provincial Associations of Chartered Professional Accountants

*We keep your personal information up to date and accurate*

CPA NL keeps your personal information up to date, accurate and relevant for its intended use. You may request access to the personal information we have on record in order to review and amend the information, as appropriate. It is the member's responsibility to provide to CPA NL any changes in personal information. A member does this by contacting the CPA NL Office. Upon receipt of requested changes to your personal information, CPA NL will update its records in a timely fashion.

*The security of your personal information is a priority for CPA NL*

We take steps to safeguard your personal information, regardless of the format in which it is held, including:

- physical security measures such as restricted access facilities and locked filing cabinets
- electronic security measures for computerized personal information such as password protection, database encryption and personal identification numbers
- organizational processes such as limiting access to your personal information to a selected group of individuals, who have completed a training program designed by CPA NL in the use and protection of member personal information
- contractual obligations with third parties who need access to your personal information requiring them to protect and secure your personal information

### *We are open about our privacy and security policy*

We are committed to providing you with understandable and easily available information about our policy and practices related to management of your personal information. To contact us, refer to the "How to contact us" section below.

### *We provide access to your personal information stored by CPA NL*

You can request access to your personal information stored by CPA NL. To contact us, refer to the "How to contact us" section below. Upon receiving such a request, CPA NL, in a timely manner, will:

- inform you about what type of personal information we have on record or in our control, how it is used and to whom it may have been disclosed
- provide you with access to your information so you can review and verify the accuracy and completeness and request changes to the information
- make any necessary updates to your personal information

### *We respond to your questions, concerns and complaints about privacy*

CPA NL responds in a timely manner to your questions, concerns and complaints about the privacy of your personal information and our privacy policies and procedures.

### How to contact us

- by calling the CPA NL Office (709)753-3090
- by email to [dperry@cpanl.ca](mailto:dperry@cpanl.ca)
- by fax to the CPA NL Office (709)753-3609
- by mail to

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