



POLICY CONCERNING THE PROTECTION OF PERSONAL INFORMATION

Introduction

Job Zone d'emploi is a non-profit organization that prepares, guides and assists individuals to find employment through employment and career counselling, information resources, job opportunities and access to community and outreach. Job Zone d'emploi may collect Personal Information in the course of its activities and has prepared this policy to inform you about our ongoing commitment to ensuring that the Personal Information obtained remains accurate and confidential.

What is Personal Information?

We consider "Personal Information" to mean any information, recorded in any form, about an identified individual or an individual whose identity may be inferred or determined from such information, other than business contact information (e.g. name, title, business address). This Policy does not cover aggregate data from which the identity of an individual cannot be determined. Job Zone d'emploi retains the right to use aggregate data in any way that it determines appropriate.

Why Job Zone d'emploi May Collect Personal Information

Job Zone d'emploi may use the Personal Information you provide verbally or in writing (including via electronic media) in order to:

- (a) Establish a relationship with you;
- (b) Provide our services to you;
- (c) Allow employers to identify potential employees;
- (d) Meet legal and regulatory requirements;
- (e) Such other purposes consistent with these purposes; and
- (f) Make appropriate information available to community organizations.

The nature of the personal information requested will depend upon the particular purpose.

How Job Zone d'emploi Collects and Uses Personal Information

Job Zone d'emploi only collects, uses and discloses Personal Information for purposes that would be considered reasonable in the circumstances and only such information as is required for the purposes of providing services to our clients. We use only fair and lawful methods to collect Personal Information.

Our use of Personal Information is limited to the purposes described in this Policy and Job Zone d'emploi does not otherwise sell, trade, barter, exchange or disclose for consideration any Personal Information it has obtained.

Consent

Unless permitted by law, no Personal Information is collected, without first obtaining the consent of the individual concerned to the collection, use and dissemination of that information. However, we may seek consent to use and disclose Personal Information after it has been collected in those cases where we wish to use the information for a new or different purpose where the individual concerned has not already consented to such a use of their personal information.

By providing Personal Information to Job Zone d'emploi you agree and consent that we may collect, use and disclose your Personal Information in accordance with this Policy. In addition, where appropriate, specific authorizations or consents may be obtained from time to time.

In most cases and subject to legal and contractual restrictions, you are free to refuse or withdraw your consent at any time upon reasonable, advance notice. It should be noted that in certain circumstances, services can only be offered if you provide Personal Information to Job Zone d'emploi. Consequently, if you choose not to provide us with any required Personal Information, we may not be able to offer you the services requested. We will inform you of the consequences of the withdrawal of consent.

When Job Zone d'emploi May Disclose Your Personal Information

With your specific authorization, Job Zone d'emploi may disclose your Personal Information (as it relates to employment/education) to:

- a) Past employers;
- b) Prospective employers in order for them to identify potential employees from our client list;
- c) Government Ministries/Agencies, including but not limited to Ontario Works, Ontario Ministry of Community and Social Services, Ontario Disability Support Program, and Ontario Ministry of Training, Colleges and Universities;
- d) Community agencies; and
- e) Other organizations that may specifically be identified.

In the event sensitive Personal Information is provided to Job Zone d'emploi, we will not disclose such Personal Information unless it is required in order to provide you with our services.

Job Zone d'emploi may also share Personal Information with Government Ministries, where required as a part of an audit of Job Zone d'emploi's delivery of service and administration of funding.

Where Job Zone d'emploi discloses Personal Information to organizations that perform services on its behalf, we will require those service providers to use such information solely for the purposes of providing services to Job Zone d'emploi, our clients or the person concerned and to have appropriate safeguards for the protection of that Personal Information.

Please note that there are circumstances where the use and/or disclosure of Personal Information may be justified or permitted or where Job Zone d'emploi is obliged to disclose information *without* consent. Such circumstances may include:

- a) Where required by law or by order or requirement of a court, administrative agency or governmental tribunal;
- b) Where Job Zone d'emploi believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety or property of an identifiable person or group; or
- c) Where the information is public.

Where obliged or permitted to disclose information without consent, Job Zone d'emploi will not disclose more information than is required.

The Accuracy And Retention Of Personal Information

Job Zone d'emploi endeavours to ensure that any Personal Information provided and in its possession is as accurate, current and complete as necessary for the purposes for which we use that information. If we become aware that Personal Information is inaccurate, incomplete or out of date, Job Zone d'emploi will revise the Personal Information and, if necessary, use its best efforts to inform third parties which were provided with inaccurate information so that those third parties may also correct their records.

We keep your Personal Information only as long as it is required for the reasons it was collected. The length of time we retain information varies, depending on the purpose for which it was collected and the nature of the information. This period may extend beyond the end of your relationship with us but it will

be only for so long as it is necessary for us to have sufficient information to respond to any issues that may arise at a later date.

When your Personal Information is no longer required for Job Zone d'emploi's purposes, we have procedures to destroy, delete, erase or convert it into an anonymous form.

Protection of Personal Information

Job Zone d'emploi endeavours to maintain appropriate physical, procedural and technical security with respect to its offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of Personal Information. This also applies to our disposal or destruction of Personal Information.

If any employee of Job Zone d'emploi misuses Personal Information, this will be considered as a serious offence for which disciplinary action may be taken, up to and including termination of employment. If any individual or organization misuses Personal Information - provided for the purpose of providing services to or for Job Zone d'emploi - this will be considered a serious issue for which action may be taken, up to and including termination of any agreement between Job Zone d'emploi and that individual or organization.

Access To Your Personal Information

Job Zone d'emploi permits the reasonable right of access and review of Personal Information held by us about an individual and will endeavour to provide the information in question within a reasonable time, generally no later than 30 days following the request. To guard against fraudulent requests for access, we require a written request to be submitted to the Executive Director. We may also require sufficient information to allow us to confirm that the person making the request is authorized to do so before granting access or making corrections.

We will provide information from our records as requested. Job Zone d'emploi reserves the right not to change any Personal Information but will append any alternative text the individual concerned believes to be appropriate.

Resolving Your Privacy Concerns

In the event of questions about: (i) access to your Personal Information; (ii) Job Zone d'emploi's collection, use, management or disclosure of Personal Information; or (iii) this Policy, you may contact us by sending an e-mail to info@jobzonedemploi.ca or calling 613-933-9675 and asking for JoAnn Hickley.

Job Zone d'emploi will investigate all complaints and if a complaint is justified, we will take all reasonable steps to resolve the issue