

## **Privacy Policy of FUSION Halifax Networking Association**

### **Policy Statement**

FUSION Halifax Networking Association (“FUSION Halifax”) recognizes the importance of an individual’s right to privacy. We are committed to collecting, using and disclosing personal information in a responsible manner in accordance with our legal requirements. FUSION Halifax also recognizes the important principles for the protection of personal information in respect of commercial activity, as set out in the *Personal Information Protection and Electronic Documents Act* (“PIPEDA”).

### **What Constitutes Personal Information?**

Personal information is any information about an identifiable individual, but does not include the name, title, business address or telephone number of an employee of an organization.

### **Collection of Personal Information**

FUSION Halifax collects personal information primarily about our members so we can provide membership benefits.

FUSION Halifax collects personal information only as permitted by law, including with the consent of individuals as appropriate.

### **Use of Personal Information**

Personal information about our members is generally used to:

- provide information to them in accordance with their instructions;
- gather and review information that is relevant to issues affecting one or more of our members; and
- provide them with information about Halifax and FUSION Halifax developments and events.

### **[any other uses?]**

FUSION Halifax shall only use personal information as permitted by law, including with the consent of individuals as appropriate.

### **Disclosure of Personal Information**

FUSION Halifax shall generally only disclose personal information to a third party:

- in accordance with member instructions and to provide services on our members’ behalf; and
- if we engage a third party to provide administrative services for the benefit of FUSION Halifax and its members in which case FUSION Halifax shall use contractual or other means to protect the personal information that is being provided to the third party.

FUSION Halifax shall disclose personal information only as permitted by law, including with the consent of individuals as appropriate.

### **Consent and Exceptions to Obtaining Consent**

FUSION Halifax recognizes the importance of obtaining consent where required by law for collection, use and disclosure of personal information. For the purpose of obtaining an individual's consent, FUSION Halifax shall consider the following principles and exceptions, as permitted by PIPEDA:

- consent may be express or implied, depending on the circumstances; express consent should generally be obtained when information is likely to be considered sensitive;
- in order for consent to be meaningful, the individual shall be notified of the purposes for which the personal information will be used or disclosed at or before the time of collection; when personal information that has already been collected is to be used for a new purpose, the additional consent of the individual to use or disclosure for that new purpose shall be obtained if required by law;
- consent can be given by an authorized representative, such as a legal guardian or a person having power of attorney;
- subject to contractual, legal and other limitations, consent may be withdrawn by an individual at any time; and
- exceptions to the requirement of obtaining consent apply in certain circumstances, and members of FUSION Halifax shall consult with its Privacy Officer if there is any uncertainty about whether such exceptions apply. Exceptions to obtaining consent may apply in the following circumstances:
  - (i) when collection or use is clearly in the interest of an individual and consent cannot be obtained in a timely way;
  - (ii) in emergencies;
  - (iii) where consent would compromise investigating a breach of contract or law;
  - (iv) consent may not be required for certain publicly available personal information, as specified by regulation, including name, address, and telephone number in publicly available telephone directories;
  - (v) to collect a debt;
  - (vi) to comply with rules of court relating to the production of information; and
  - (vii) in other circumstances where permitted or required by law.

## **Safeguards for Personal Information**

FUSION Halifax shall take appropriate physical, organizational and technological measures in order to safeguard all personal information under our control. The nature of the security measures we employ will vary depending on the amount, distribution, format, method of storage and, above all else, the sensitivity of the information that has been collected. Any personal information that we collect shall be retained as long as is necessary to fulfil the purpose for which the information was collected, and as required to satisfy any potential legal obligations that FUSION Halifax may have in respect of the information.

## **Rights of the Individual**

Subject to our legal obligations and restrictions, an individual whose personal information is under our control shall, upon request, be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. He or she shall be able to challenge the accuracy and completeness of the information and have it amended as reasonably required. Furthermore, FUSION Halifax shall make available to such individuals a copy of this policy and any other information relating to our management of personal information that we deem appropriate for distribution.

## **Contact Us**

Individuals who wish to file a complaint, make an inquiry regarding or obtain access to their personal information, may contact the FUSION Halifax privacy officer:

Level Y. Y. Chan  
c/o FUSION Halifax Networking Association  
1969 Upper Water Street, Suite 2101  
Purdy's Wharf Tower II  
Halifax NS B3J 3R7

## **Website**

Personal information may also be collected by FUSION Halifax on or through our website ([www.fusionhalifax.ca](http://www.fusionhalifax.ca)). Our privacy policy governing the use of our website can be found on our website's homepage.

## **Changes to this Privacy Policy**

Since FUSION Halifax regularly reviews its policies and procedures, this privacy policy may be changed from time to time.