



## Chapter Privacy Policy

**NOTE: This document is currently under review by the PMI-SAC board and may be revised to meet regulatory and/or operational requirements.**

### Document Purpose and Scope

This document constitutes the Privacy Policy of the Project Management Institute Southern Alberta Chapter; hereafter referred to as the Chapter. It describes the collection, management and use of Personal Information by the Chapter. The Project Management Institute, hereafter referred to as PMI and with which the Chapter is affiliated, has additional policies and guidelines which also govern the Chapter's activities in whole or in part depending on local legislation and regulations. This document does not apply to PMI or any of its components or chapters other than the Project Management Institute Southern Alberta Chapter.

The Chapter respects the privacy of individuals in all aspects of its operations. Personal Information shall only be collected and used by the Chapter in accordance with this Privacy Policy. The Chapter is committed to meeting or exceeding the privacy standards being established by federal and provincial regulators and will comply with the provincial *Personal Information Protection Act (PIPA)* and with the federal *Personal Information Protection and Electronic Documents (PIPED) Act* to the extent that they are applicable.

The Chapter has always been, and will continue to be, committed to maintaining the accuracy, confidentiality, and security of Personal Information. As part of this commitment, we have established Privacy Principles to govern the Chapter's actions as they relate to the use of member and non-member information. You are invited to review these principles, which have been built upon the values set by the Canadian Standards Association's *Model Code for the Protection of Personal Information*, PIPA (Alberta) and PIPEDA (Canada).

- Principle 1 - Accountability
- Principle 2 - Identifying Purposes
- Principle 3 - Consent
- Principle 4 - Limiting Collection
- Principle 5 - Limiting Use, Disclosure and Retention
- Principle 6 - Accuracy
- Principle 7 - Safeguarding Personal Information
- Principle 8 - Openness
- Principle 9 - Individual Access
- Principle 10 - Handling Complaints and Suggestions

### Principle 1 - Accountability

*The Chapter is responsible for maintaining and protecting Personal Information under its control. In fulfilling this mandate, the members of the Chapter's Board of Directors are collectively responsible to be familiar with this Privacy Policy and ensure that Chapter activities comply with the Privacy Principles defined therein.*

### Principle 2 - Identifying Purposes

*The purpose for which Personal Information is collected shall be identified before or at the time of collection.*

Furthermore, from time to time individuals will be appropriately reminded in Chapter publications, and on the Chapter's web site, of the nature of Personal Information maintained and the purposes for which it is used.



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### Principle 3 - Consent

*The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except where (PIPA) provides otherwise.*

The Chapter will not collect Personal Information by any automatic or surreptitious process. Information will be collected only when voluntarily and knowingly supplied in the process of registering for an event, completing a form or application, or some other overt activity.

Information collected by the chapter web site shall be statistical only; e.g. total number of page visitors. No cookies or back tracing mechanisms will be used.

### Principle 4 - Limiting Collection

*The Personal Information collected must be limited to those details necessary for the purposes of normal and reasonable chapter activities and operations. Information must be collected by fair and lawful means.*

Personal Information may be obtained by the Chapter in a number of manners:

- PMI collects Personal Information from individuals applying for, or renewing, their PMI and/or Chapter membership as well as from individuals who attend PMI sponsored courses or events and/or who contact PMI requesting information on membership or events. PMI provides this information to the Chapter.
- The Chapter may collect Personal Information from individuals registering for, and/or attending, Chapter sponsored events such as dinner or lunch meetings, courses, seminars, social events and symposiums.
- The Chapter may collect Personal Information submitted directly by individuals as part of a voluntary request to be added to the Chapter contact mailing list.
- In the process of receiving payment for Chapter services and/or participation in Chapter sponsored events, credit card information may be accepted. This information shall be used solely for the purposes of processing the relevant financial transaction. No credit card information will be stored or kept on file by the Chapter.

The Personal Information details collected and managed by the Chapter may include, but is not limited to: name(s) and title; employer and position or job description; work address, phone numbers(s) and email addresses(s); home address, phone number(s) and email address(s); professional status and certification level; industry and occupation; etc.

### Principle 5 - Limiting Use, Disclosure and Retention

*Personal Information may only be used or disclosed for the purpose for which it was collected unless the individual has otherwise consented, or when it is required or permitted by law. Personal Information may only be retained for a reasonable period of time as required to fulfill the purpose for which it was collected.*

Personal Information may be used by the Chapter for a variety of purposes including, but not limited to: membership solicitation and/or renewal; contacting individuals to provide information on Chapter activities and/or to promote Chapter sponsored events; the direct distribution of paid advertisements for project management related courses, services, or products; demographic analysis in support of strategic planning; the distribution of surveys and questionnaires; solicitation of professional papers, presentations and course proposals; verification of professional certification credits related to Chapter sponsored events; etc.



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Under PMI guidelines the Chapter may produce a Membership Directory. Individuals who have asked to be excluded from directories shall not be included. Individuals may request to be excluded by checking the relevant box on their membership application or renewal form, by sending a specific request to PMI, or by communicating directly to the Chapter. The Chapter will provide no less than 30 days notice prior to the preparation of a directory in order to allow individuals to request exclusion. The Chapter will directly distribute directories solely to those individuals listed therein. Further, and in accordance with PMI policy, any directory will clearly and prominently include the following disclaimer:

*Warning! This list is for official PMI Southern Alberta Chapter (PMI-SAC) use, as well as individual communication of a networking nature by PMI-SAC members and potential members. Use of this information for any other purpose, including, but not limited to, reproducing and storing in a retrieval system by any means, electronic or mechanical photocopying or using the names, addresses, e-mail addresses, and phone numbers for any private, commercial or political mailing is strictly prohibited.*

PMI has provided further clarification regarding appropriate individual use of a directory. Examples of uses which are not appropriate include, but are not limited to:

- the sale or release of Membership and Prospect Database listings and/or information to any third party (except in accordance with Sections IV and V of this policy [*PMI Membership and Prospect Database Information Policy*]); and,
- the use of mailing lists by Component officers, board members, appointed committee members or other authorized representatives to promote services, products or other offerings in which those individuals have a personal, financial or other interest.

Networking has been described as the exchange of ideas and/or information between two individuals and is deemed an appropriate use. Networking is one of the key benefits for PMI and the Chapter, so allowing members to network themselves to find personal employment is acceptable. However, it is unacceptable for individuals to use a directory to contact members to promote business ventures, investments, or products, or, for political purposes. Marketing contacts to solicit the immediate, or eventual, sale or purchase of a product are inappropriate.

PMI has affirmed that Chapters can provide information regarding project management products and services to their members. What the Chapter cannot do is provide Personal Information access to the product vendor or service provider. Other than the Membership Directory described above, Chapter will not, for any reason or purpose, distribute or release to third parties Personal Information collected in the course of the Chapter's operations. Specifically, the Chapter will not release information to any third party for a commercial, political or promotional purpose. Paid advertisements accepted by the Chapter will be directly distributed by a member of the Board of Directors or an assigned assistant or committee member. The Chapter will not utilize distribution services which require the provision or release of Personal Information.

Personal Information shall be erased and/or destroyed as soon as possible after having been deemed outdated or of no further immediate use to the Chapter.

### **Principle 6 - Accuracy**

*Personal Information must be maintained in as accurate, complete and up-to-date form as is necessary to fulfill the purposes for which it is to be used.*



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The Chapter relies on Personal Information voluntarily provided by individuals directly and/or indirectly (e.g. through PMI). The Chapter strives to maintain accurate records; however, this cannot be achieved without the assistance of the individuals who are encouraged to provide updated information as/when appropriate.

The Chapter has no responsibility for the accuracy, maintenance or use of Personal Information collected, retained and distributed by PMI; individuals must contact PMI directly on matters involving PMI's central records.

### **Principle 7 - Safeguarding Personal Information**

*Personal Information must be protected by reasonable and appropriate security safeguards*

The Chapter stores Personal Information primarily in electronic forms; i.e. databases, spreadsheets, documents, email repositories, etc. From time to time, physical copies of extracted data may be produced (typically for working purposes).

Personal Information may be stored and/or handled by members of the Chapter's Board of Directors and associated assistants, committee members and agents in the due course of completing their assigned responsibilities. All reasonable efforts and measures will be taken to ensure the privacy and security of the Personal Information stored or handled by the Chapter's representatives and agents. Electronic records shall be stored and maintained off-line; i.e. on individual, non-networked computers. Non-archived physical records will be kept in the possession of the Chapter's authorized representatives and agents, and destroyed in an appropriate manner when no longer required. Archived physical records will be kept in a locked storage facility accessible only by designated members of the Chapter's Board of Directors.

Personal Information will not be provided to any individual or organization without a valid, authorized need arising directly out of a Chapter related assignment or operation.

### **Principle 8 - Openness**

*Individuals shall have access to information concerning the policies and practices that apply to the management of their information.*

This Privacy Policy, as well as other Chapter policies and copies of applicable PMI policies, will be plainly posted on the Chapter's web site and referenced at appropriate times and places.

### **Principle 9 - Individual Access**

*Upon request, individuals shall be informed of the existence, use and disclosure of their information, and shall be given access to it. Individuals may verify the accuracy and completeness of their information, and may request, if appropriate, that it be amended.*

Any individual may, at any time, submit a written request to the Chapter's Vice President of Operations (email is acceptable), and receive a copy of their Personal Information currently held by the Chapter. Requests for amendments or corrections to Personal Information are welcomed (see Principle 6 - Accuracy) and will be processed as soon as possible after receipt.



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Any individual may request removal from the Chapter's mailing list. Upon receipt of such a request, the majority of the information on the individual's record in the Chapter's primary contact database will be erased; but the base record will be retained and flagged in order to prevent accidental re-activation (e.g. as the result of a regular PMI update). All removal requests will be honored as soon as possible after receipt.

Any Chapter member, or non-member, may request that their Personal Information be completely removed from the Chapter's records. Such requests will be honored as soon as possible after receipt; however, having removed all record of an individual the Chapter cannot preclude the creation of a new record for that individual should Personal Information subsequently be received through one of the regular collection processes.

In accordance with PMI policy, the Chapter will take reasonable and appropriate measures to ensure that individuals who request to be excluded from mailings, directories and other communications are not included in those activities.

### **Principle 10 - Handling Complaints and Suggestions**

*Individuals may direct any questions or enquiries with respect to the Privacy Principles outlined above, or about our practices, to the Chapter's Vice President of Operations.*

Contact information for the Vice President of Operations, and other members of the Chapter's Board of Directors, shall be made available on the Chapter's web site.

Inquiries will be responded to by the Vice President of Operations and/or other members of the Board as may be appropriate. Complaints and suggestions will be logged by the Vice President of Operations and presented within a reasonable time to the Board at a regular Board meeting. Board responses to complaints and suggestions will be conveyed to the originator by the Vice President of Operations.