

PRIVACY STATEMENT

INTRODUCTION

Community Futures is a federally supported not-for-profit community organization with a volunteer Board of Directors and professional staff whose purpose is to support community economic development and small business growth through business loans or loan guarantees.

This brochure summarizes Community Futures' privacy policies and procedures that have been developed to comply with Canada's *Personal Information Protection and Electronic Documents Act* ("*PIPEDA*"). *PIPEDA* sets out rules for the collection, use and disclosure of a client's or customer's personal information, as well as safeguarding that information in the course of commercial activity as defined in the legislation.

WHAT IS "PERSONAL INFORMATION"

Under *PIPEDA*, "Personal Information" means any information that is identifiable to an individual, including name, address, telephone number, Social Insurance Number, and date of birth. It also includes, but is not limited to, other information relating to identity, such as, nationality, gender, marital status, financial information and credit history.

PURPOSES FOR PERSONAL INFORMATION

Community Futures collects only that personal information required to assess a prospective applicant's eligibility for financial assistance, as well as to report to the Federal Economic Development Agency for Southern Ontario, the Federal department that administers the Ontario Community Futures' Program.

CONSENT

At the time of completing a loan or grant application, the express, written consent of the individual applicant will be sought for the collection, use, retention and disclosure of their personal information for the purposes set out in Community Futures' privacy policy.

An applicant may choose not to provide some or all of the personal information requested, but if Community Futures is unable to collect sufficient information to validate a financing request, the application for financing may be turned down.

ACCURACY

Community Futures endeavours to ensure that all personal information in active files are accurate, current and complete. When a client notifies Community Futures that his or her personal information requires correction or updating, the necessary changes will be made. Information contained in closed files is not updated.

LIMITING USE, RETENTION & DISCLOSURE

Community Futures uses and retains personal information for only those purposes to which the individual has consented.

Personal information will be disclosed to only those Community Futures employees, volunteer members of committees and/or Board of Directors that need to know the information for the purposes set out in the Community Futures Privacy Policy.

SAFEGUARDS

Community Futures utilizes a number of physical, organizational and technological measures to safeguard personal information from unauthorized access or inadvertent disclosure in accordance with its *Information Security, Retention and Destruction Policy*, including but not limited to:

Physical

Active files are stored in locked filing cabinets located in work areas restricted to Community Futures employees and authorized volunteers. Personal information will be retained in client files as long as the file is active and for the length of the Federal Contribution Agreement + seven (7) years from the expiry of the Agreement or its early termination in accordance with the Agreement. Inactive files are stored in locked cabinets for the period prescribed above, after which, the information is shredded prior to disposal. Information contained in an inactive file will be retained for the length of the Federal Contribution Agreement + seven (7) years from the expiry of the Agreement or its early termination in accordance with the Agreement, except in the case where an application is rejected. Where an application has been rejected, the file and all personal information contained in the file will be retained for a period of two (2) years.

Organizational

Community Futures employees, volunteers, and third party service providers sign confidentiality agreements binding them to safeguarding the confidentiality of personal information to which they have access.

Technological

Personal information contained on Community Futures computers and the electronic data base are password protected. As well, the Internet server or router has firewall protection to protect against virus attacks and hacking into the data base. Personal information may also be contained in a secure internet based environment subject to Community Futures' privacy and data security protocols.

Electronic Transmission of Information

Notwithstanding the technological safeguards implemented by Community Futures, all Internet transmissions are susceptible to possible loss, misrouting, interception and misuse. For this reason, as part of the application that individual's sign consenting to their personal information being collected, used, retained, and disclosed, Community Futures will assume that it has the individual's consent to communicate via the Internet unless notified to the contrary.

INDIVIDUAL ACCESS

An individual who wishes to review or verify what personal information is held by Community Futures may do so by making a request, in writing to the Community Futures' Chief Privacy Officer. Upon verification of the individual's identity, the Chief Privacy Office will provide a written report within 60 days.

INVESTIGATING COMPLAINTS

Any concern or issue about Community Futures' personal information handling practises may be made, in writing, to the Chief Privacy Officer. Upon verification of the individual's identity, the Chief Privacy Officer will act promptly to investigate the complaint and provide a written report to the individual.

If the individual is dissatisfied with the report provided by the Chief Privacy Officer, or feels that the corrective action taken by Community Futures is insufficient, the individual may direct a complaint to the Federal Privacy Commissioner in writing. The address of the Federal Privacy Commissioner is provided in this Privacy Statement for your convenience.

AMENDMENTS TO OUR PRIVACY POLICY

This Privacy Statement is a summary of Community Futures' Privacy Policy. For full particulars of Community Futures' privacy policies and procedures, please request a copy

of the Privacy Policy from Community Futures or a copy may be obtained from the Internet website at: www.community-futures.ca

The Community Futures Privacy Policy and this Privacy Statement are in effect April 7, 2004 and is retroactive to January 1, 2004. Community Futures' Privacy Policy and this Privacy Statement may be updated from time to time to reflect amendments in applicable Federal and Provincial laws. Any changes to this Privacy Policy will be posted on Community Futures website and will apply to personal information collected from the date of the posting of the revised Privacy Policy.

CONTACT INFORMATION

If you have any questions regarding Community Futures' Privacy Policy, Information Security, Retention and Destruction Policy, and/or this Privacy Statement, or you wish to make an access to personal information request, please contact:

Chief Privacy Officer CPO@community-futures.ca
Community Futures T: (613) 332-5564
26 Chemaushgon Rd. 1-800-465-4119
Box 517 F: (613) 332-5628
Bancroft, ON K0L 1C0

OTHER HELPFUL PRIVACY LINKS

For a copy of *PIPEDA*, or for answers to other questions regarding privacy legislation, below are some helpful privacy links.

Federal Privacy Commissioner
www.privcom.gc.ca
112 Kent Street
Ottawa, ON K1A 1H3

Provincial Privacy Commissioner
www.privcom.on.ca

Siskind, Cromarty, Ivey & Dowler LLP
Privacy Law Group:
www.siskindsprivacylaw.com



Community Futures Development Corporation
of North & Central Hastings and South Algonquin

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