

Policy on the Retention and Destruction of Personal Information

Policy Brief & Purpose

The CIOC collects many types of personal information from different individuals depending on the organization's relationship to that individual, in accordance with our privacy policy. Determining the proper length of time to retain personal information and using appropriate methods to destroy records containing personal information not only constitute best practices in handling personal information but is also required by applicable Canadian data protection laws. This policy will outline the reasons for which information is retained, how records should be destroyed, and will provide CIOC specific guidelines for handling personal information that we store.

The CIOC's policy on the retention and destruction of records containing personal information is based on two overarching premises:

1. The CIOC will retain records containing personal information only for as long as it is necessary to fulfill the purposes for which the information was originally collected, and to meet statutory, fiscal, contractual, administrative, and operational requirements. The CIOC will ensure that all records containing personal information are accurate and complete, and will ensure that records are retained for an appropriate amount of time pursuant to any applicable laws and regulations to those records.
2. When according to point 1 it is determined that certain records are no longer necessary, the CIOC will securely destroy said records before disposing of them.

The following sections of the policy create a 3-step document management procedure that can be referenced by CIOC personnel authorized to oversee and handle records containing personal information.

1. Categorizing personal information

This section constitutes the first step in developing a document management procedure by defining major categories of records containing personal information based on the purposes for which that information was collected.

1. **Applicants and competitors to the CIOC's triennial competition:** Organists who apply to take part in the CIOC's organ competition submit a variety of personal information in order to facilitate the processing of their application. This includes contact information, permanent address, date of birth, and a scan of a passport.
2. **Jury members for the CIOC's triennial competition:** The individuals engaged to sit on the jury for the CIOC's organ competition submit a variety of personal information to facilitate their travel to Montreal, and to process their remuneration. This includes contact information, and a scan of a passport.
3. **CIOC employees:** Upon hiring new employees the CIOC collects necessary information to process that employee's payments and to process tax documents submitted to Canada Revenue Services and Revenu Québec, including banking information, SIN number, and contact

Policy on the Retention and Destruction of Personal Information

information.

Additional information from employees may be collected from the CIOC as needed for that employee to carry out their role within the organization and for the purpose of establishing, managing or terminating an employment relationship.

4. **Donors:** The CIOC collects and retains contact information, home address, and giving history of those who donate to our organization for the purposes of managing those donations and soliciting donations from them in the future.
5. **Subscribers and clients:** Those who subscribe to the CIOC newsletter submit basic contact information such as an email address. Those who purchase tickets to CIOC events or buy CIOC merchandise often submit a debit or credit card number, and often submit other information necessary for processing payments, such as an email address and home address.

2. Recommended retention periods

As the second step in CIOC's document management procedure, the table below provides guidelines for appropriate retention periods of each category of records. These guidelines should be followed excepting situations where:

1. There is a demonstrable interest in retaining a record or records for longer than the recommended period of time because it is still needed to fulfill the purpose for which it was collected. There are also cases where parts of records will be retained for reference or archival purposes, but the parts of those records containing sensitive personal information will be removed and securely destroyed.
2. There are applicable laws and regulations that mandate the retention of the records for a specified period of time longer than the guidelines.

Category	Minimum retention period	Recommended maximum retention time
CIOC Applicants and Competitors	Until the preliminary jury makes their selections for unsuccessful applicants	Unsuccessful applicants: Within 1 year of the preliminary jury's decision.
	Until the end of the competition for competitors that did not win the competition	Unsuccessful competitors: Within 1 year following the competition.
	XXX	Successful competitors: as long as necessary in order to play at concerts or make recordings in the future.
CIOC Jury Members	Until the end of the competition	Within 1 year following the competition, unless the CIOC expects to invite a jury member to perform concerts in the future.
CIOC Employees	4 years following the departure of the employee (the statute of limitations for litigation). Employee tax slips and other tax documents are	Within 5 years of the departure of the employee; for tax documents within 7 years

Policy on the Retention and Destruction of Personal Information

	exceptionally retained for a minimum of 6 years counting from the last tax year to which they relate (<i>Income Tax Regulations, subsection 230(4)</i>)	
Donors	No specific minimum	If a donor becomes “inactive”, in the sense that they no longer give to the organization, their personal information should be removed within 7 years of them becoming inactive unless they become an active donor again during that period.
Subscribers	No specific minimum	Because the newsletter is disseminated by email, the contact information of subscribers only needs to be removed when they unsubscribe.
Clients	4 years following the purchase (the statute of limitations for litigation).	Contact information (such as an email address and home address) and purchase history should be removed within 5 years of the purchase. The CIOC does not retain credit card numbers or any other associated payment information.

3. Secure Destruction of Personal Information

When, according to the above table a record or records containing personal information are deemed to be no longer necessary, the CIOC will take steps to securely destroy the information based on the following destruction methods:

1. For **paper copies of records**, shredding using a cross-cut shredder or incineration are acceptable methods of destruction.
2. For **compact discs, floppy discs, and cassette or VHS tapes**, the media should be physically destroyed such as by breaking, cutting into pieces, or puncturing, before disposal.
3. For defunct **computer hard drives or SSD's, external hard drives or SSD's, or other digital storage media** that are to be disposed of, physical destruction is required before disposal, by means such as breaking into pieces, cutting into pieces, or puncturing. Note that deletion of files off of a computer hard drive does not usually render them completely unrecoverable.
4. For **digital/electronic copies**, all copies will be deleted and if such copies are contained in an archive computer backup system, they will not be accessed, nor will there be any attempt of recovering such, and will be subject to internal information security practices.

Policy on the Retention and Destruction of Personal Information

Retention of records by a third-party service provider

The CIOC uses multiple service providers to facilitate the collection and storage of certain records, some of which contain personal information. The CIOC uses these service providers to streamline the collection and storage of personal information, especially for the purposes of collecting donations and retaining donor contact information, and for accepting applications to the CIOC's triennial competition. The CIOC selects third-party service providers on the basis of their reputability as an information handling service and entrusts the third-party with the protection of the information collected on behalf of the CIOC, in accordance with applicable data protection laws. The CIOC also assumes in cases where personal information is stored on a third-party platform that the third-party's privacy policy is applicable to their storage, handling, and removal of the information.

Destruction of records by a third-party service provider

The CIOC may engage the services of a third-party service provider to destroy records in cases where there is too high a volume to be destroyed at once for the CIOC to handle internally. When engaging the services of a third-party service provider for the destruction of records, the CIOC will ensure that the contract for the provision of services notably specifies:

- The process used for destruction
- An acknowledgement by the service provider that the information being processed is confidential
- That a confidentiality agreement will be signed by the service provider's employees who have access to the records
- That secure storage is required prior to destruction
- That the service provider will inform the CIOC if it subcontracts the destruction work and will ensure that subcontractors, if applicable, will be subject to similar contractual measures.

Failure to comply with this policy

CIOC could face significant fines and/or penalties if it fails to adequately and timely comply with its obligations regarding the processing of personal information. Therefore, any employee who does not comply with this policy may be subject to disciplinary action up to and including termination. Any employee who becomes aware of a violation of this policy shall promptly report any such violation to the Privacy Officer. If you are unsure about any of the requirements in this policy, please contact the Privacy Officer.

Changes to this policy

The CIOC will update this policy at our discretion in consultation with the Privacy Officer when it is determined that a change needs to be made to keep up with best practices, or when changes to applicable privacy and data protection legislation or other relevant developments, taking into account new practices or recommendations issued by the Privacy Officer and/or external guidance issued by



Policy on the Retention and Destruction of Personal Information

Privacy

Commissioners, obligate us to do so. CIOC employees will be notified in writing of any changes made to this policy, and up-to-date versions will always be available on the CIOC website.

This policy was last updated on September 23, 2023