

# Process for Handling Inquiries and Complaints related to Privacy

## Process Brief & Purpose

Individuals interacting with the CIOC, including employees, clients, donors and competitors, have the right to make inquiries or complaints about the collection, use, disclosure, and processing of their personal information by the CIOC, and regarding the CIOC's compliance with applicable Canadian data protection laws.

## Process for Employees

CIOC employees who receive an inquiry or complaint regarding personal information have the following responsibilities:

1. Record the date on which the inquiry or complaint is received, together with the nature of the complaint.
2. Immediately transfer the inquiry or complaint to the Privacy Officer.

## Process for the Privacy Officer

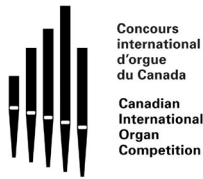
The Privacy Officer is the CIOC employee entrusted with overseeing the organization's privacy policies and procedures and will thus handle complaints and inquiries related to privacy and personal information as follows:

1. The Privacy Officer will acknowledge, in writing, the receipt of the inquiry or complaint promptly.
2. The Privacy Officer will validate or confirm the identity of the claimant before proceeding.
3. The Privacy Officer will seek clarification regarding the inquiry or complaint as needed, and will evaluate the validity of a complaint, having regard to all relevant factors.
4. The Privacy Officer will then notify the individual of the outcome of their complaint promptly, together with any steps taken as a result of the inquiry or complaint, within 30 days of the receipt of the inquiry or complaint.

## Obligations of the CIOC

There are some cases in which the CIOC is legally obliged to acquiesce to requests for the access, rectification, or removal of an individual's personal information. These cases are as follows, noting that the claimant's identity has been first duly verified:

- The CIOC must confirm the existence of a claimant's file containing personal information upon request, and what personal information is stored in the file.
- The CIOC must enact any request to rectify personal information that is incomplete, inaccurate, or out of date.
- The CIOC must enact any request to remove information from a file that was collected in a manner not authorized by the law, or that was clearly collected for a purpose that is not justifiable based on the claimant's relationship to the CIOC.



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- The CIOC must notify the claimant of the outcome of their inquiry, request, or complaint within 30 days.
- While not entirely mandated by law, as a policy the CIOC will handle inquiries, requests, and complaints related to personal information free of charge.

### Refusals of requests to access, rectify, or remove personal information

The CIOC will make every effort to enact access, rectification, and removal requests, however there are two specific situations in which we may deny a request:

- The CIOC is required by law, for regulatory, contractual and administrative purposes to deny a request to access, modify, or remove personal information.
- Modification or removal of information would make it impossible for the CIOC to conduct business with or fulfill contractual obligations to the claimant. In these cases the claimant may be given the option to terminate any contractual agreements they have with the CIOC that requires retention of certain personal information.

### 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 Process

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 Canadian data protection laws or other relevant developments, taking into account new practices or recommendations issued by the Privacy Officer and/or external guidance issued by Privacy Commissioners require 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 June 15, 2023.