



## International Organization of Nutritional Consultants

115 George St., Suite 513, Oakville, ON, CA L6J 0A2

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### 1004A Privacy Policy

ISSUED BY: International Organization of Nutritional Consultants

SUBJECT: Privacy Policy

EFFECTIVE DATE: January 1, 2004

REVISION DATE: Feb 17 2011

### 1.0 Overview

#### 1.1 Preamble

Privacy of personal information is an important principle of the International Organization of Nutritional Consultants, hereafter referred to as IONC. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for IONC services that we provide. We also are diligent at being open and transparent as to how we handle personal information. This document describes our privacy policies.

#### 1.2 Effective Date and Revisions

We are required to comply with the terms of this privacy policy while it is in effect. We reserve the right to modify the policy at any time and the revised privacy policy will apply to all personal information that we currently have as well as to information that we may generate in the future. This policy will be in effect from January 1, 2004, until such date that an amended policy is published. If we change the privacy policy, we will post the amendments in our office, have copies available and publish it on our website for you to download.

#### 1.3 Personal Information

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as:



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- ♣ age, name, ID numbers, income, ethnic origin, or blood type;
  - ♣ opinions, evaluations, comments, social status, or disciplinary actions; and
  - ♣ employee files, credit records, loan records, medical records, existence of a dispute between a consumer and a merchant, intentions (for example, to acquire goods or services, or change jobs).
- Personal information does not include the name, title, business address or telephone number of an employee of an organization and thus is not protected by privacy legislation nor covered by this policy.

### 1.4 About IONC

IONC was established in 1983 to ensure the public that practitioners are meeting high educational standards and that clients receive consistent, high quality Nutritional Consulting services.

### 2.0 Purpose

The purpose of this document is to outline the policies in effect that govern IONC's collection, storage, retention, use and disclosure of personal information. These rules are in place to protect IONC, our members, employees and volunteers. Failure to comply with this policy exposes IONC and our members to a breach of confidentiality resulting in potential legal liability and loss of confidence.

### 3.0 Scope

This policy applies to the board of directors, staff and volunteers and to contractors and consultants that may provide services to the IONC on occasion.



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### 4.0 Policy

#### 4.1 We Collect Personal Information:

The collection of personal information is limited to that which is necessary for our purposes.

##### **PRIMARY PURPOSES:**

IONC collects and uses personal information for new applicant registration, when collecting fees and for maintaining a list of membership.

##### **SECONDARY PURPOSES:**

This allows us to process renewals, add our members to our web-site directory, send out our newsletter, perform mass emailing when up-dating our members on important issues and mailing IONC documents to members.

##### **DISCLOSURE:**

IONC uses and discloses personal information only for purposes for which we have consent (implied or written), or as required by law. IONC discloses our members' registration numbers, names, addresses and phone numbers to Partners Indemnity for purchasing members' liability insurance.

**ACCURACY:**IONC endeavours to maintain accurate and up-to -date records.

#### 4.2 We Protect Personal Information:

We understand the importance of protecting personal information. For that reason, we have taken the following steps:

- ♣ Board of Directors, employees, including temporary staff, and volunteers are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
- ♣ Paper copy is kept in a locked file cabinet/ and or locked office, in a supervised area.



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- ♣ Passwords are used on computers to protect electronic data, in a supervised area.
- ♣ Paper information is transmitted through sealed, addressed envelopes or boxes by postal service.
- ♣ Our web-site is protected by security safeguards appropriate to the sensitivity of the information with the proper firewalls and virus protection in place.
- ♣ Verbal personal information is collected and used in such a manner that the information is not overheard by persons other than the staff.
- ♣ External consultants and agencies with access to personal information must enter into privacy agreements with us.

### **4.3. We Retain and Destroy Personal Information Records:**

We need to retain personal information for some time to ensure that we can answer any questions you might have about the services we provided to you and for our own accountability to external regulatory bodies.

In compliance with the requirements of other legislation, we keep our member files and records for a minimum of 10 years. We keep any personal information relating to our general correspondence (i.e. newsletters, seminars and marketing activities for about 12 months after the newsletter ceases publication or a seminar or marketing activity is over. You can ask us, in writing, to restrict our uses and disclosures of your personal information at any time. We will discontinue to use or to disclose your personal information after a written revocation of your implied or informed consent is received, unless we have already acted in reliance upon this consent, or as directed by legal requirements.

We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it and, when hardware is discarded, we ensure that information on the hard drive is destroyed.



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### **4.4. You Can Look At Your Information:**

Upon request, you have the right to see what personal information we hold about you. We will need to confirm your identity, if we do not know you, before providing you with this access. We reserve the right to charge a nominal fee for such requests.

We may ask you to put your request in writing. If, for legal reasons, we cannot give you access, we will notify you within 30 days, and provide the reason, as best we can, why we cannot give you access.

If you believe there is a mistake in the information we have about you, you have the right to ask for it to be corrected. We may ask you to provide documentation that our files are incorrect. Where a mistake has been made, we will make the correction.

### **4.5. Do You Have A Question?**

Our Privacy Officer, Catherine Carleton Fitchett, can be reached to answer any questions or concerns you might have at:

IONC

Email: [info@ionc.org](mailto:info@ionc.org)

If you wish to make a formal complaint about our privacy practices or the application of those practices,

you may make it in writing to our Privacy Officer, who will acknowledge receipt of your complaint;

ensure that it is investigated promptly and that you are provided with a formal decision from the Board of

Directors and explanation in writing.



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### 5.0 Enforcement

Any found to have violated this policy may be subject to disciplinary action, up to and including termination. Use of any personal information in the possession of or under the control of IONC for illegal activity is grounds for immediate dismissal of office, and we will cooperate with any legitimate law enforcement activity.

### 6.0 Further Information

This policy is made under the Personal Information Protection and Electronic Documents Act. That is a complex Act and provides some additional exceptions to the privacy principles that are too detailed to set out here.

For more general inquiries, the Information and Privacy Commissioner of Canada oversees the administration of the privacy legislation in the private sector. The Commissioner also acts as a kind of ombudsman for privacy disputes. The Information and Privacy Commissioner can be reached at:

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PHONE (613) 995-8210 | TOLL-FREE 1-800-282-1376  
FAX (613) 947-6850 | TTY (613) 992-9190  
WEB SITE: [www.privcom.gc.ca](http://www.privcom.gc.ca)

### 7.0 Revision History

#### 7.1 3<sup>rd</sup> Party Collection of Credit Card Information

As of July 1, 2005, IONC uses Beanstream Internet Commerce Inc. to collect credit card information when members renew online. This information is stored up to 6 months as this information is necessary for dealing with several reports and charge-back issues. The security of their servers is certified regularly by an organization, Ambiron, which is sanctioned by the credit card industry.