

OIL SANDS SAFETY ASSOCIATION ("OSSA")
FEDERAL
PRIVACY CODE FOR PERSONAL INFORMATION

OSSA has established a privacy policy to protect and manage your – the Customer’s – personal information. This policy has been drafted to be compliant with the Federal *Personal Information Protection and Electronic Documents Act* and the Canadian Standards Association *Model Code for the Protection of Personal Information*.

1. Principle One — Accountability

- 1.1 OSSA has implemented a Privacy Code consisting of policies and procedures to protect personal information received from its Customers, and to respond to their inquiries and complaints. The Code also provides that OSSA will use appropriate contractual means to maintain a comparable level of protection for their personal information which is sent for processing on OSSA’s behalf by third parties.
- 1.2 OSSA has designated responsibility for personal information to its Privacy Officer the Executive Director of the OSSA at (780) 715-3925, who ensures compliance with the principles in this Privacy Code. Other OSSA individuals may be delegated to act on behalf of the Privacy Officer.
- 1.3 OSSA collects personal information such as your email address, name, home or work address, telephone number, your computer hardware and software (e.g. IP address, browser type, domain name, access times, and referring web site addresses), company name, address, office phone, fax and cell phone numbers, e-mail addresses, and primary contact person.

2. Principle Two — Purposes for Collecting Personal Information

- 2.1 OSSA collects personal information for the following general purposes (Identified Purposes):
 - (a) to inform Customers of services available from OSSA and its affiliates;
 - (b) to meet legal and regulatory requirements.

The information will be maintained for primary utilization in the following manner and is provided on behalf of an Accredited Training Provider and remains on file:

1. On the OSSA web page for any individual or organization to preview in order to request training from OSSA accredited training provider;
2. In the OSSA files along with other pertinent information in order to complete any of the following processes: contacting individuals and/or organizations, training program reviews, auditing training programs, providing notification of safety training standards updates, amendments to the standards, recertification timelines, etc.

3. Principle Three — Consent for Collection, Use or Disclosure

- 3.1 OSSA will normally seek each Customer’s consent on paper, electronic forms, or telephone conversations, for the collection, use and disclosure of the Customer’s personal information for the Identified Purposes either at the same time it collects the personal information or after it has been collected but before it is used or disclosed for a new purpose. In certain circumstances however, OSSA is not required to inform and obtain the consent of the Customer, such as investigation of a breach of an agreement, contravention of laws, an emergency where the life, health or security of an individual is threatened, disclosures to OSSA’s lawyers, collection of a debt, or compliance with legal process.
- 3.2 OSSA may require that each Customer consents to the collection, use and disclosure of the Customer’s personal information as a condition of supplying OSSA services, to the degree required to be able to supply such services. Use of OSSA services by a Customer will constitute the Customer’s implied consent for OSSA to collect, use and disclose personal information for the Identified Purposes.
- 3.3 Subject to applicable legal or contractual restrictions, a Customer may withdraw consent at any time, on reasonable notice, and OSSA will advise of the implications of the withdrawal.

4. Principle Four — Limiting Collection of Personal Information

- 4.1 OSSA limits its collection of personal information to that which is necessary for the Identified Purposes. OSSA primarily collects personal information directly from its Customers, but may also collect it from other sources such as credit bureaus, employers, references and third parties who represent that they have the right to disclose such information.

5. Principle Five — Limiting Use, Disclosure, and Retention

- 5.1 OSSA uses or discloses personal information only for the Identified Purposes, and does not sell, rent or lease it to anyone else. The Identified Purposes may necessitate that OSSA disclose the personal information to:
- (a) an agent of the Customer;
 - (b) agents of OSSA acting on its behalf;
 - (c) a credit reporting agency;
 - (d) a public authority to avoid or minimize danger to life or property; and
 - (e) a third party if the Customer consents, or if disclosure is required by any laws such as the *Alberta Freedom of Information and Protection of Privacy Act*, to the extent applicable.
- 5.2 OSSA will keep personal information only as long as it remains necessary for the Identified Purposes or as required by law, but sufficiently long enough to reasonably allow a Customer affected by its use to access it. OSSA will destroy personal information that is no longer necessary for the Identified Purposes, provided it is not required by law to be retained.

6. Principle Six — Accuracy of Personal Information

- 6.1 OSSA will use reasonable efforts to keep Customer’s personal information accurate, complete, and up-to-date as necessary for the Identified Purposes and for minimizing the possibility of making inappropriate Customer decisions based on such information. OSSA will update personal information only as and when necessary for the Identified Purposes. Customers are responsible for informing OSSA about changes to their personal information, as appropriate.

7. Principle Seven — Security Safeguards

- 7.1 OSSA will use reasonable efforts to protect personal information against loss, theft, unauthorized access, disclosure, copying, use or modification or destruction, through security safeguards that depend on the levels of sensitivity of the information. Methods of protection include organizational measures (contracts, security clearance, limiting access to need-to-know OSSA personnel), technological measures (passwords, encryption) and physical measures (locked file storage, passwords). OSSA will control personal information disclosed to third parties by entering into agreements which contain confidentiality provisions and restrictions on use and which limit the amount of

information disclosed to only that which is needed to deliver the services. OSSA employees having access to personal information will be advised of the importance of the Privacy Code.

8. Principle Eight — Openness of Policy

- 8.1 This Privacy Code, and all updates to the Privacy Code made from time to time, are available to OSSA’s Customers on its web site. It is the Customer’s obligation to periodically check the OSSA web site for Privacy Code updates. The current address for the OSSA web site is: www.ossa-wb.ca.

9. Principle Nine — Access to Personal Information

- 9.1 Upon request made to the Privacy Officer by a Customer who provides sufficient identification, OSSA will inform the Customer of the existence, use and disclosure of the Customer’s personal information, and will afford the Customer a reasonable opportunity to review the personal information in the Customer’s file, in understandable form, at minimal or no cost depending on the complexity of the request. OSSA will within 30 days make the personal information, its use, and the parties to whom it has been disclosed, available to the Customer, or will provide a written explanation if additional time is required to fulfil the request.
- 9.2 If OSSA is not able to provide access to some aspect of a Customer’s personal information, it will provide reasons for denying access such as that by doing so would likely reveal personal information about a third party, or that it is confidential commercial information or solicitor–client privileged communications, or that the information relates to a breach of an agreement or a contravention of law, or that its disclosure could reasonably be expected to threaten the life or security of another individual.
- 9.3 Customers have the right to request that inaccurate or incomplete information be amended as appropriate. OSSA will promptly correct any personal information found to be inaccurate or incomplete, and transmit the amended information to third parties having access to such personal information. Any unresolved differences as to the alleged accuracy or incompleteness will be noted in the Customer’s file.

10. Principle Ten — Challenging Compliance

- 10.1 OSSA wants to ensure that its Privacy Code meets its Customers’ needs. If you feel that the Privacy Code requires improvement, or believe that OSSA is not following its Privacy Code, please contact the Privacy Officer at (780) 715-3925. OSSA will investigate all suggestions and complaints concerning the OSSA Privacy Code. If a

complaint is found to be justified, OSSA will take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. A Customer will be informed of the outcome of the investigation regarding the Customer’s complaint.

- 10.2 A Customer may also seek advice and file complaints at the Office of the Privacy Commissioner of Canada www.priv.com.gc.ca, at 1-800-282-1376 or info@privcom.gc.ca.