



Privacy Policy

Amputee Coalition of Canada

Marc James Tomlinson, Executive Officer

Table of Contents

INTRODUCTION.....	1
WHO’S ON POINT?	2
INFORMATION COLLECTED.....	2
<i>Chart One – Summary of Information Collected</i>	2
CONSENT	3
SECURITY PLAN	3
COLLECTION OF SENSITIVE INFORMATION	5
THIRD PARTIES LIST	6
PRIVACY PRACTICES	6
UPDATES	6
MEMBER PRIVACY	6
WEBSITE	7
PRIVACY STATEMENT OF THE AMPUTEE COALITION OF CANADA	7
<i>Our Pledge</i>	7
<i>Definition of Personal Information</i>	8
<i>What personal information do we collect about you?</i>	8
<i>When you visit our site, we may collect:</i>	8
<i>How do we use this information?</i>	8
<i>Do you use my personal information for secondary reasons?</i>	9
<i>Do you share any of my personal information with Third Parties?</i>	9
<i>How do we get your consent?</i>	9
<i>How do I opt out?</i>	9
<i>How do I get more information?</i>	10

Privacy Policy

Amputee Coalition of Canada

Introduction

The following document is the Privacy Policy for the Amputee Coalition of Canada. It is based upon the advice and recommendations from the Office of the Privacy Commission¹. The Header of this policy contains both the version number and the effective date of this policy. This policy document of the Amputee Coalition of Canada is available for public release in both French and English.

This privacy policy serves as the Amputee Coalition of Canada's compliance document in order to meet the organization's obligations under Canada's two privacy laws: the Personal Information Protection and Electronic Documents Act (PIPEDA) and the Privacy Act. Furthermore, this document also serves as the Coalition's privacy plan with respect to the laws of Québec, specifically:

Provincial Laws:

- [Act Respecting Access to Documents Held by Public Bodies and the Protection of Personal Information](#)
- [Act Respecting the Protection of Personal Information in the Private Sector](#)
- [An Act to amend the Act respecting health services and social services, the Health Insurance Act and the Act respecting the Régie de l'assurance maladie du Québec](#)

¹ The mandate of the [Office of the Privacy Commissioner of Canada](#) (OPC) is overseeing compliance with both the [Privacy Act](#), which covers the personal information-handling practices of federal government departments and agencies, and the [Personal Information Protection and Electronic Documents Act \(PIPEDA\)](#), Canada's private sector privacy law.

Who's On Point?

The Privacy Officer of the Amputee Coalition of Canada is Marc James Tomlinson. Mr. Tomlinson also serves as the Executive Officer of the Coalition. Enquiries related to the privacy policies of the Coalition can be routed through:

<i>Means</i>	<i>Coordinates</i>
Mail	6363 Hudson Road Montréal, Québec H3S 1M9
E-mail	privacy@amputeecoalition.org
Phone	1-866-611-2677

Information Collected

The Amputee Coalition of Canada gathers, stores and utilizes personal information in order to deliver the best possible service to those individuals who utilize our programs and services.

Chart One – Summary of Information Collected

TYPE OF INFORMATION	WHAT WE COLLECT	WHO COLLECTS IT	FOR WHAT REASON	WHO USES IT	STORED BY	SHARED WITH
Contact Information	Name Address Postal Code Phone Number E-mail	Administrator	Program Utilization	Administrator Regional Representatives	Electronic File Paper File	None
Customer Demographics	Date of Birth/Age Gender	Administrator	Program Utilization	Administrator Regional Representatives	Electronic File Paper File	None

Opinion/Interests	Interests and Hobbies	Administrator	Program Utilization Link Members	Administrator Regional Representatives	Electronic File Paper File	None
Other Information	Health/Medical Information	Administrator	Program Utilization	Administrator Regional Representatives	Electronic File Paper File	None

Consent

The Amputee Coalition of Canada requires the use and storage of sensitive information in order to administer its programs and services in the best interests of Canadians with limb loss. When collecting sensitive information, such as date of birth/age; interests and hobbies and especially health/medical information, the Coalition makes every effort to receive ‘express consent.’ The Amputee Coalition of Canada recognizes that ‘express consent’ is given explicitly may received either orally or in writing. In all situations, the Amputee Coalition of Canada shall provide “opt-out consent” when collecting information to provide opportunities for Members to decide not to share their personal information.

Security Plan

The Security Plan of the Amputee Coalition of Canada details the safeguards in place to best protect the personal and sensitive information that is collected and stored by the Coalition.

- ***Employee Access to Customer Information***
 - There are no employees or volunteers within the Amputee Coalition of Canada who see or process information unnecessarily. Our restrictions on who is able to view and handle personal information reduce the risk of inappropriate use or disclosure.

- One example of our restrictions to information is geographical. No Regional Representative can view or access any information that is not part of their defined region.
- ***Storage of Personal Information: Paper Files***
 - The Amputee Coalition of Canada keeps paper files containing personal information. The following information is stored via paper files:
 - Name;
 - Address;
 - Postal Code;
 - Phone Number;
 - E-mail Address;
 - Date of Birth/Age;
 - Gender;
 - Interests and hobbies;
 - Cultural Information;
 - Health/Medical Information.
 - This information is handled and stored by healthcare professionals who have been trained in the proper handling of sensitive personal information. We make every effort to safely and securely store personal information kept on paper files by the following means:
 - A locked cabinet;
 - Within a restricted area;
 - And in certain situations the paper files maybe protected within an area with an alarm system.
- ***Storage of Personal Information: Electronic Files***
 - The Amputee Coalition of Canada stores the personal information that it collects via electronic media. The following information is stored and protected electronically:
 - Name;
 - Address;
 - Postal Code;
 - Phone Number;

- E-mail Address;
 - Date of Birth/Age;
 - Gender;
 - Interests and hobbies;
 - Cultural Information;
 - Health/Medical Information.
- The Amputee Coalition of Canada recognizes the requirement to take all measures possible to safely store the personal information of our Members. We utilize a number of the latest security solutions to protect the sensitive information provided to us, including:
- Computer passwords;
 - Firewalls;
 - Encrypted data files;
 - Electronic audit trails that identifies who has access to information;
 - Backup files kept in a locked cabinet.

The Coalition does not store personal information on laptops or portable storage devices, including, but not limited to, USB keys. All of our portable devices are continually monitored to ensure the strongest form of protection possible.

Collection of Sensitive Information

The Amputee Coalition of Canada collects sensitive information to best serve its membership. The sensitive information collected by the Coalition is:

- Date of Birth/Age;
- Interest and hobbies;
- Cultural Information;
- Health/Medical information

Due to the nature of this collected information, the Coalition may employ more than one method of collection to ensure that it is kept confidential. The Coalition also routinely

checks the information that it has collected to ensure that it is still required for its intended purpose. Any piece of information that is no longer required to assist the Coalition in fulfilling its mission is securely destroyed.

Third Parties List

The Amputee Coalition of Canada does not, nor has it ever sold, traded or rented any of our information or mailing lists.

Privacy Practices

Personal information gathered by the Amputee Coalition of Canada is held in confidence. We have created safeguards to ensure that only those individuals with need are permitted to access personal data. Gathered information is utilized only for specific purposes and measures are taken to ensure that the personal data held by the Coalition is not lost or destroyed. The gathering, storing and utilization of personal information are part of our ability to complete our stated mission.

Updates

The Amputee Coalition of Canada will have its most current and up-to-date privacy policies posted in both English and French on its website. Please check our homepage to review the most recent privacy policies of the Coalition.

Member Privacy

The Amputee Coalition of Canada adheres to a very strict protocol to protect the privacy of our members with limb loss. The Coalition has received full and informed consent to gather

and store information on our members with amputation. Any image, picture, video or media release from the Amputee Coalition of Canada featuring one or more of our amputee members has been received prior consent.

Website

The Amputee Coalition of Canada utilizes its website as the principle means of communicating with its members, donors, partners and other interested persons. Our website is currently undergoing an upgrade that will see new features and content that will prove to be more interactive and informative. Please check our website often to see the latest changes in both official languages.

Privacy Statement of the Amputee Coalition of Canada

Our Pledge

The Amputee Coalition of Canada pledges to protect the privacy of personal information of its officials, trainers, mentors, members, donors and other partners. Your willingness to provide personal information allows the Coalition to do a better job for all amputees across Canada. Such a willingness to provide personal information to the Amputee Coalition of Canada requires a commitment and pledge on our part to both respect and protect the information collected. We will be transparent and accountable for the proper handling of all information collected and will never sell, trade or rent our information or mailing lists.

Over the past few years, the Amputee Coalition of Canada has successfully created a national network of healthcare professionals, amputees and interested persons in each region of our vast country. This network is a valuable resource and one that can be used to help improve the programs and services of the Coalition as well as expand the opportunities of persons with limb loss where ever they may live in Canada.

The Amputee Coalition of Canada has created a Privacy Policy that defines the guidelines created to ensure the proper handling personal information. If you have any questions, comments or complaints regarding the privacy policy of the Amputee Coalition of Canada, please do not hesitate to contact our Privacy Officer at

privacy@amputeecoalitioncanada.org or call 1-866-611-2677.

Definition of Personal Information

Personal information is defined as any piece of information that can be used to identify, contact or distinguish an individual. The Amputee Coalition of Canada gathers and maintains only the required personal information about you to support our programs and services.

What personal information do we collect about you?

The Amputee Coalition of Canada collects the following information about you:

- Name
- Address
- Postal Code
- Phone Number
- E-mail Address
- Gender
- Date of Birth/Age
- Interests and Hobbies
- Health/Medical information

When you visit our site, we may collect:

- Information about your computer, including your Internet Protocol (IP) address, the type of operating system and browser you use, and your computer's location
- What pages you visit on our website and what links you click on
- What other websites you have visited recently

How do we use this information?

The main reason we collect personal information from you allow the best possible outcome for our programs and services. The Amputee Coalition of Canada offers programs and services designed to support the needs of persons affected by limb loss, specially designed to improve their quality of life through a focus on learning, self-management and active community participation.

The three (3) activities that the Amputee Coalition of Canada focuses upon are:

1. *Peer Visitor*® Program
2. *Promoting Amputee Life Skills*® (PALS) Program
3. *“Freedom through Sport”* Program

We do not collect financial information, nor do we disclose your information to any third party.

Do you use my personal information for secondary reasons?

Yes, if you elect to provide us with your hobbies and interests, then we may share that information with other persons with limb loss in your area that have similar interests. You may opt-out in providing this type of personal information at any time.

Do you share any of my personal information with Third Parties?

No, we do not share your personal information with any third parties.

How do we get your consent?

When you complete the Peer Visitor Training/Registration form or our Membership form, we will ask you for only the information relevant to the Coalition’s programs and services. No non-relevant information shall be collected.

If we ask you for personal information for a secondary reason – like your cultural information, we will either ask you directly for your consent or provide you with an opportunity to say “no.” Saying “no” is often referred to as “opting out.” By opting out, you are instructing us not to collect the information. Remember that the Amputee Coalition of Canada will never share your personal information with any third parties.

How do I opt out?

The Amputee Coalition of Canada greatly values the trust placed in us when asking for personal information. We recognize persons may not be comfortable in providing all the requested information and as such, the Coalition respects your rights not to provide requested information to us.

Here is an example of opting out:

When you fill out the Peer Visitor Training/Registration form for the Amputee Coalition of Canada, you provide us with information and preferences. The form will ask about your cultural information as well as provide you with a tick box that states "Please tick the Opt Out box if you do not want to provide your cultural information."

How do I get more information?

The Amputee Coalition of Canada has created a Privacy Officer position to handle all enquiries related to the privacy policy of the Coalition as well as the information collected and stored. Should you have any questions, would like more information about our policies, or wish to register a compliant, please contact:

- Marc James Tomlinson, Privacy Officer
- Phone: 1-866-611-2677
- E-mail: privacy@amputeecoalitioncanada.org
- Address: Amputee Coalition Canada
6363 Hudson Road
Montréal, Québec H3S 1M9

You can also contact the Office of the Privacy Commissioner of Canada for assistance between the hours of 9am and 5 pm (Eastern Standard Time), at:

- Toll-free: 1-800-282-1376
- Phone: (613) 995-8210
- Fax: (613) 947-6850
- TTY: (613) 993-9190
- Address: 112 Kent Street
Place de Ville
Tower B, 3rd Floor
Ottawa, Ontario K1A 1H3

Or on the Web at: www.privcom.gc.ca

For enquiries within Québec, please contact:

Québec Commission d'accès à l'information du Québec
575 St. Amable Street Suite 1.10 Québec, Québec G1R 2G4

- Phone: (418) 528-7741
- Toll-free: 1 (888) 528-7741 (free within Québec)
- Email: Cai.Communications@cai.gouv.qc.ca
- Web Site: <http://www.cai.gouv.qc.ca/index-en.html>