Association of Postal Officials of Canada

Confidentiality and Privacy Policy

A. Definitions:

- *APOC* shall mean the Association of Postal Officials of Canada
- *APOC Executives* shall mean National Officers, Divisional Vice-Presidents, Branch Executives and Branch Representatives
- *APOC Information* shall mean APOC's own strategy plans; forecasts and financial strategies; and other property relating to the affairs of APOC
- *Member Personal Information* shall mean personal and sensitive information regarding APOC Members
- *Employees* shall mean any and all persons hired by APOC to work in their National Office

B. Confidential Information

APOC Information can either be factual or subjective information, recorded or not. It can include discussions at National Executive Meetings, Branch Presidents' Meetings, Convention, or less formal discussions where the affairs of APOC are discussed and debated. It may also be in verbal form and disclosures of APOC Information can occur when discussions are overheard by others not authorized to hear the information.

Member Personal Information can also be either factual or subjective information, recorded or not. It can include a member's age, name, addresses, e-mail addresses, financial information, identification numbers, income and benefits, medical and health information, their families' personal information, disciplinary record, performance reviews, and so on. Member Personal Information may be in print or electronic form. It may also be in verbal form and disclosures of Member Personal Information can occur when discussions are overheard by others not authorized to hear the information.

C. Commitment

In the course of the important work and services that the Association of Postal Officials of Canada ("APOC") performs and provides on behalf of its Members, APOC Executives and employees come into contact with APOC Information and Member Personal Information. Such information is to be considered confidential information and APOC is committed to ensuring its confidentiality.

In keeping with this commitment, Executives and Employees must keep confidential any APOC Information and Member Personal Information that may be disclosed to them or may otherwise be learned by them in the course of their work with APOC.

D. Responsibilities

It is expected that every Executive and Employee, from the National President in Ottawa to the many Branch Executives across the country, will be committed to the following directives with

respect to APOC Information and Member Personal Information (together known as "Confidential Information"):

- Do not access Confidential Information that is not required for the purposes of carrying out duties to APOC.

- Do not, directly or indirectly, use or disclose APOC Information without authorization from the National President or his delegate (except as required to do so to carry out duties to APOC) or at any time during or after their work with APOC.

- Members have a right to know what personal information is collected, used and disclosed about them and the purposes for that collection, use or disclosure. Where possible, collect personal information directly from the Members themselves so that the purpose(s) of the collection can be explained to them and so that consents can be obtained from them directly. When the information is being collected from third parties (ie: from the Corporation), inform the Member of that collection, its intended use and the reasons for doing so.

- Do not collect more Member Personal Information than is needed to meet the purpose that was discussed with the Member. Ensure that the Member knows what collection is mandatory and what is not. Allow members to "opt-out" of non-mandatory collection, use and disclosure.

- If a Member has given consent for the collection of his/her own personal information on the basis of a particular purpose and it is necessary to use the information for a new purpose, fresh consent must be obtained from the Member.

- Do not, directly or indirectly, disclose Member Personal Information whether in writing, electronically, or verbally to any third parties without the Member's consent. Where consent is not possible or is being unreasonably withheld, seek guidance from the National President or his delegate.

- Ensure that Member Personal Information is accurate and allow Members to correct any errors that are discovered.

- Safeguard all Confidential Information and follow all security measures mandated by APOC for the protection of Confidential Information. These measures will include physical measures, technological tools and organizational controls. They will also include rules on both storage and retention of Confidential Information as well as rules on destruction or anonymization of the information when there is no longer a purpose to retain the information. The more sensitive the information, the greater the expectation will be to secure it from loss or unauthorized disclosure.

- Do not use Confidential Information obtained as a result of work with APOC to further any private enterprise, or as a means of making personal gains.

- If in doubt at any time as to whether certain information is confidential, or whether it meets the definition of Member Personal Information, get approval from the National President or his delegate before disclosing it to anyone.

- To ensure that only complete and accurate information is communicated to the press or public and to meet APOC's requirements of consistency and confidentiality, only authorized individuals may communicate with the public or the press through correspondence, personal interviews or public statements with regard to APOC's views, positions, policies, practices or concerns about, among other things, any activities that affect or are affected by the work of and services provided by APOC to its members. Prior authorization to speak on behalf of APOC must be obtained from the National President or his delegate.

- Do not represent personal views as those of APOC and be particularly careful not to represent personal views when using APOC stationery or APOC e-mail accounts to communicate with third parties.

- In the course of their work with APOC, individuals may become aware of personal information about fellow Employees and Executives. APOC depends on the maturity and loyalty of everyone who works for APOC to keep private any such personal information and to keep confidential any personal information they come into contact with during the course of their work for APOC.

E. Compliance

The National President is responsible for ensuring compliance with this ***Confidentiality and Privacy Policy***. He may, from time to time, delegate another individual in APOC to act on his behalf.

In the event that a Member has a complaint or concern with respect to APOC's informational handling practices and/or compliance with this Policy, the Member should be referred to the National President who will ensure the complaint is investigated and documented without delay.

Should a complaint be brought forward naming the National President, the National 1st Vice-President shall be responsible for dealing with the Complaint.

If it is found that any Executive or Employee has breached this Policy, sanctions, up to and including expulsion from APOC or termination of employment, shall follow.

Guy Dubois, National President

Rick Williams, National Secretary-Treasurer