# PSAC PRIVACY POLICY: Protection of the Personal Information of Members and the Public

# **Table of Contents**

Overview	3
What Personal Information does PSAC Collect?	3
Why does PSAC Need Personal Information?	4
Accuracy	5
How does PSAC Protect Personal Information?	5
Retention and Destruction of Personal Information	6
Website Privacy	7
Your Rights Concerning Your Information	7
Contact Us	8
Changes to this Policy	9

### Overview

The Public Service Alliance of Canada ("**PSAC**") is committed to protecting the privacy, confidentiality, accuracy, and security of the personal information it collects, uses, and communicates in the course of fulfilling its legitimate purposes as a certified bargaining agent.

In this Privacy Policy, "PSAC" refers to the PSAC Centre and any Directly Chartered Locals ("**DCLs**") that do not have their own privacy policies. (Members should refer to the privacy policies of PSAC's Components and, if applicable, DCLs, for information about how those entities protect the personal information in their possession.)

This Privacy Policy guides PSAC's practices concerning the collection, use, disclosure, protection, retention and destruction of members' personal information, as well as the personal information of members of the public who engage with PSAC on its website or otherwise. For clarity, this Privacy Policy does not apply to the collection, use, or disclosure of the personal information of our employees or former employees, as that is addressed in the PSAC Employee Privacy Policy.

This Privacy Policy applies to our websites (<a href="www.psacunion.ca">www.syndicatafpc.ca</a>, and each of our regional websites), our digital applications, membership database, and any interactions with us through any means or forums, including e-mail communications. In addition, this Privacy Policy applies to our collection, use, and/or disclosure of the personal information of employment candidates. Additional policies setting out details of certain aspects of PSAC's practices may be developed from time to time and will be included on PSAC's website.

If you click through links to third-party websites or third-party applications from our website, this Privacy Policy does not apply to such external sources. It is always a good idea to read the privacy policies of any such third parties to understand what they do with your information.

### What Personal Information does PSAC Collect?

In order to fulfill its legitimate purposes, PSAC may collect personal information including, for example members' names, home mailing addresses, e-mail addresses, telephone numbers, birth date, gender, and language preference. PSAC may also collect employment-related information such as work history, job classification, duties, rates of pay, and dues records.

Additional information may also be collected to fulfill other representational obligations or to provide specific services to members. For example, PSAC may collect or use additional personal information in the course of providing representation in respect of grievances or other matters arising under a collective agreement or otherwise related to members' employment.

We may collect information regarding members' self-identification with an equity group, for purposes outlined in the section below, including the composition of statistics regarding our membership, developing programs and strategies that address members' needs, and communicating with members about information relevant to them.

PSAC may also collect personal information relating to members' accommodation needs.

We also collect personal information of candidates who apply for jobs via the online portal on our website. This information may include, for example, an applicant's full name, e-mail address, telephone number, professional experience, skills, career objectives, CV/resumé, and references.

Please note that we may also collect and use your information for any other purpose permitted or required by law.

# Why does PSAC Need Personal Information?

PSAC collects personal information of its members in order to carry out its legitimate purposes which include its representational obligations, providing a variety of member services, and communicating about union business. PSAC will be required to collect certain personal information in order to:

- Represent members with respect to employment matters under collective agreements and applicable legislation;
- Investigate and resolve grievances, appeals, and claims;
- Maintain a complete record of membership in the union;
- At an aggregate level, compile statistics about the composition of the union's membership and develop programs and strategies that address membership needs;
- Communicate and engage with members about union business and respond to their inquiries;
- Provide information about union membership programs and benefits;
- Provide print and internet-based information services;
- Administer the business of the union, including component/local business, correspondence, and research (i.e., member surveys);
- Consult with members with respect to union programs, priorities, and activities;

- Facilitate participation in union events;
- Collect and manage dues and assessments;
- Verify eligibility for and administer strike pay and benefits;
- Process members' expense claims for participation in union events or activities;
- Assess and respond to members' accommodation requests, in accordance with PSAC's human rights obligations;
- For social and political advocacy in accordance with the mandate set out in the PSAC constitution: and
- Comply with other statutory or regulatory requirements.

Personal information may be collected, used or disclosed as required for the provision of the above services, purposes consistent with these services and/or the fulfillment of PSAC's mandate.

In addition, and subject to applicable laws, PSAC reserves its right to investigate and publish personal information concerning individuals who cross picket lines during a strike.

### Accuracy

PSAC is committed to ensuring that any personal information it collects, uses, discloses or retains is as accurate, current, and complete as is necessary for the purposes for which it uses the data. Members have the right to review and correct their personal information should they wish. Members who have ongoing grievances should ensure to provide PSAC with any updates to their personal information, including contact information. PSAC will make every reasonable effort to record and update personal information on an ongoing basis as required.

### **How does PSAC Protect Personal Information?**

PSAC is committed to protecting members' personal information from loss or theft as well as unauthorized access, use and disclosure. This commitment means that:

All personal information collected by PSAC is held in strict confidence. However,
we recognize that certain situations may require the sharing of personal
information, such as in the context of our representational obligations, or when
legally mandated. In such cases, we ensure that only the necessary information
is disclosed, and we implement appropriate safeguards to protect that
information, in a manner that is consistent with this policy and any applicable
legislation;

- PSAC will employ appropriate physical and technological safeguards and security standards to protect and maintain the confidentiality of members' personal information according to its sensitivity and to ensure only authorized individuals have access to members' personal information;
- PSAC will ensure that access to personal information is limited to authorized PSAC employees, officers, and representatives in the performance of their job function and/or for fulfillment of PSAC's legitimate purposes;
- PSAC members who have access to membership information and who are found to be abusing that information (for example, the unauthorized distribution of membership lists or information) may be subject to disciplinary action in accordance with the PSAC Constitution;
- In some circumstances and as permitted by law, PSAC may also share personal information with external legal or financial advisors, consultants, contractors, benefit and pension plan administrators, insurers or regulators who require access to this information in fulfillment of PSAC's legitimate purposes;
- In some circumstances and as permitted by law, PSAC may need to communicate your personal information outside of your jurisdiction of residence. This may occur, for example, when we are required to comply with legal obligations or engage third-party service providers who operate in different jurisdictions and require access to your information to perform the required services.
- PSAC will use members' personal information only for the purposes it has identified, or for purposes permitted or required by law;
- PSAC will not disclose members' personal information without permission unless it is required or authorized by law to do so; and
- PSAC will not distribute personal information to a third party without members'
  consent unless required to do so by law, in which case the information released
  will be limited to what is legally required. Membership lists and personal
  information about members will never be sold or used for any commercial
  purposes.

### **Retention and Destruction of Personal Information**

Members' information may be held at PSAC's offices (physically and/or electronically), and those of authorized third parties as described above. Some of these third parties may be based outside of a member's region, or may share the information outside of

the member's region. By submitting information to PSAC, members consent to the communication of their information to, and the storage of that information, outside of their region. While such information is outside of their region, it is subject to the laws of the jurisdiction in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other jurisdictions pursuant to local laws. However, PSAC's practices regarding members' information will continue to be governed by this Privacy Policy.

PSAC will retain personal information only as long as it is reasonably required to fulfill the purpose for which it was collected, where it is necessary or prudent to further the interests of PSAC members or where retention of records is required by law. Different retention periods may apply for different types of personal information. For example, longer retention periods may be required where the personal information relates to legal and/or ongoing issues affecting members.

When personal information is no longer required PSAC will destroy it in a confidential, secure method in a manner that is consistent with this policy and any applicable legislation or where appropriate, anonymize it to use for a legitimate purpose.

# **Website Privacy**

We collect technical information from our website users, which may include IP address, date, time and duration of your visits on our website, the pages viewed and links clicked on our website, your language preferences, browsing history, web pages that redirected you to our website. We collect this information using small files known as "cookies" and/or "pixels" on our website, including those provided by trusted third parties who collect it on our behalf. This information allows us to compile aggregate data about traffic and interactions on our website in order to improve our services, website content, and advertising. You can change your cookies settings directly via your browser settings. Please be advised, however, that rejecting certain cookies may prevent you from taking full advantage of our website.

# **Your Rights Concerning Your Information**

When supported by a written request and, in certain circumstances, proof of identification, you may consult the personal information we have collected, used or shared, and ask that it be corrected. Under certain circumstances and subject to applicable laws, you may withdraw your consent to our disclosure or use of personal information collected.

As required or permitted by law, and in certain circumstances, you may be entitled to additional rights such as (i) the right to receive computerized/electronic personal information collected from you in a structured, commonly used and electronic format and to have this information transferred directly to another organization; (ii) the right to be informed of and submit observations if PSAC uses any automated decision-making relating to you; and (iii) the right to request information about how PSAC processes your personal information. PSAC will provide accommodation to members with disabilities, as needed, to enable their right of access.

Finally, you also have a right to lodge a complaint with a competent data protection authority, where available under applicable laws in the jurisdiction where you normally reside, or where an alleged infringement of data protection law has taken place.

To exercise any of these rights or to receive further information, please contact our Privacy Officer using the contact information below.

### **Contact Us**

If you have any questions, requests or complaints regarding your information or this Privacy Policy, please contact our Privacy Officer at <a href="mailto:Privacy-Confidentialite@psac-afpc.com">Privacy-Confidentialite@psac-afpc.com</a> or in writing to:

Public Service Alliance of Canada 233 Gilmour Street, 11th Floor Ottawa, Ontario K2P 0P1 Attention: Privacy Officer

# **Changes to this Policy**

PSAC may from time to time make changes to this Privacy Policy to reflect changes in legal or regulatory obligations or changes in the manner in which PSAC deals with personal information. Any revised version of this Privacy Policy will be posted on PSAC's website. This Privacy Policy was last updated as of the effective date listed at the end of this document.

Last updated: November 2024