

## Privacy Policy

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**Board Approval Date:** January 1, 2021

**Review Date:** January 1, 2022

### Policy

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Access Credit Union Limited (the “Credit Union”) recognizes that as a provider of financial services, Members provide and entrust the organization with sensitive personal information. It is the Credit Union’s obligation to protect and handle this information, at a minimum, in accordance with established regulatory guidelines. The Credit Union maintains a fiduciary responsibility to its Members to act in their best interests with respect to the overall storage, communication, protection and use of this information.

The Credit Union is bound by and adhere to the following legislation and guidelines:

- *Personal Information Protection and Electronic Documents Act* (PIPEDA) under the authority of the Officer of the Privacy Commissioner of Canada (OPCC); and
- *Canada’s Anti-Spam Legislation* (CASL) enforced by:
  - Canadian Radio-television and Telecommunications Commission (CRTC);
  - The Competition Bureau of Canada; and
  - The Office of the Privacy Commissioner of Canada (OPC).

To effectively manage privacy risk, the Credit Union will have a privacy management program in place that will meet the needs of the organization and its Members, as well as adhere to and adapt to changes in Canada’s privacy legislation and related guidelines. The privacy management program will include at a minimum the following:

- Organizational Commitment - An internal governance structure that fosters a privacy respectful culture. This includes the appointment of a Privacy Officer and Deputy Privacy Officer with defined roles and established reporting mechanisms;
- Program Controls - Policies, procedures, training & education and incident response protocols; and
- Public Disclosure - Clear and written information with respect to its commitments to Privacy, outlined in the form of a Code that is easily accessible to all via print or electronic means.

The program will be a fluid mechanism that will adapt to changes in regulations, guidelines and Credit Union product, service and delivery channel offerings.

### Authorities

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Monitoring adherence to this policy is delegated by the Board of Directors (the “Board”) to the Audit Committee.

### Governance Responsibility

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The responsibility of the Board and by extension any appointed committee is to:

- understand the basic regulatory requirements as it relates to PIPEDA, obtained through review of pertinent regulations, management reporting, as well as Board specific training requirements;
- appoint a Privacy Officer and Deputy Privacy Officer;
- receive reports and make reasonable enquiries to gain assurance that the privacy management program is being executed in an effective manner; and

- review this policy as needed but not less than every two years and determine any appropriate revisions.

## Management Responsibility

Management is expected to develop the necessary management level policies and procedures to ensure compliance with all regulatory requirements.

Specific responsibilities of the President & Chief Executive Officer (the “CEO”) include:

- ensuring Credit Union compliance with this policy and all aspects of PIPEDA and CASL;
- monitoring proposed and enacted revisions to applicable regulatory requirements, and assess them for impact on the Credit Union’s business operations and the privacy management program;
- establishing the duties of the Privacy Officer and Deputy Privacy Officer, providing sufficient resources to adequately fulfill the responsibilities;
- ensuring that adequate systems capabilities are in place in order for Employees to adequately fulfill their responsibilities while still allowing for effective and efficient business operations;
- ensuring adequate communication to Employees is undertaken to allow for widespread understanding of and compliance with policies and procedures;
- ensuring that formal and adequate training requirements are in place for Employees and Directors; and
- establishing, reviewing and updating management level policies and procedures to ensure adherence to this policy including those covering the following areas:
  - public facing privacy policy guidelines or codes;
  - responding to information requests/member access to information;
  - breach and incident management response protocols;
  - service provider management;
  - obtaining and managing consent; and
  - data gathering, protection & retention practices.

While the CEO remains ultimately responsible for the implementation and monitoring of this policy, some or all responsibilities may be delegated to other Management.

## Reporting

In many cases, reports and measures must presented to demonstrate compliance with this policy.

Report #	Report Name	Report Description	Audience	Frequency
1	Privacy Report	Includes any issues, Member escalations, changes to legislation, or direct correspondence with the Office of the Privacy Commissioner (OPC)	Audit Committee	Quarterly
2	Annual Review	Program effectiveness	Audit Committee	Annually
3	Serious Breach Report	Details on any serious privacy incidents including any breach reports sent to the OPC	Audit Committee	Via Board Portal - As Occur

## Related Documents

Unless otherwise stated, references are to the latest version of listed documents.

- *Personal Information Protection and Electronic Documents Act (PIPEDA)*
- Office of the Privacy Commissioner of Canada
- Canada's Anti-Spam Legislation
- Governing document(s)
- Operating policies
- Other procedures
- Forms

## Revision History

Revision Level	Revision Date	Description of Revision
Initial	January 1, 2021	New policy