

PRIVACY POLICY

Protection of Personal Information

Purpose:

The Board of Directors of Leading Edge Credit Union recognizes the importance of privacy to members, and its need to comply with the Personal Information Protection and Electronic Documents Act (PIPEDA).

Policy Statement:

Leading Edge Credit Union will comply with the Personal Information Protection and Electronic Documents Act (PIPEDA), the requirements of which apply to Leading Edge Credit Union's operational use of personal information in commercial activity as well as use of employee information.

Application:

The requirements of the Code establish the credit union's operational use of personal information in commercial activity, as well as use of employee information.

The Board of Directors, through the CEO, delegates day-to-day accountability and responsibility under this policy to a Privacy Officer and will designate the Privacy Officer.

Additionally, the Board of Directors, through the CEO will designate an alternate Privacy Officer who will be available in the event of absences by the Privacy Officer and will have identical decision-making responsibilities during those absences.

The Privacy Officer, as documented in the Credit Union Code for the Protection of Personal Information and supporting Policies and Procedures, manages primary responsibilities under this Policy.

The compliance program will, at a minimum, include the following:

1. Collection, use and disclosure procedures that comply with the Code;
2. Record retention procedures that comply with the Code;
3. Appropriate reporting and dispute resolution procedures;
4. A self-assessment program to annually review the procedures to ensure the effectiveness of such policies and procedures;

5. Procedures for the initial and on-going training of employees with respect to their obligations under the Code;

The Code sets out the following ten key privacy principles:

- 1) Accountability – The credit union is responsible for personal information under its control, and will designate a Privacy Officer who is accountable for the credit union’s compliance with the principles of the Code.
- 2) Identifying Purposes – The purposes for which personal information is collected will be identified by the credit union at or before the time the information is collected.
- 3) Consent – The knowledge and consent of the member are required for the collection, use or disclosure of personal information, except in specific circumstances as described within this Code.
- 4) Limiting Collection – The collection of personal information will be limited to that which is necessary for the purposes identified by the credit union. Information will be collected by fair and lawful means.
- 5) Limiting Use, Disclosure and Retention – Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the member or as required by law. Personal information will be retained only as long as necessary for the fulfillment of those purposes.
- 6) Accuracy – Personal information will be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.
- 7) Safeguards – Personal information will be protected by security safeguards appropriate to the sensitivity of the information.
- 8) Openness – The credit union will make readily available to members specific, understandable information about its policies and practices relating to the management of personal information.
- 9) Individual Access – Upon request, a member will be informed of the existence, use and disclosure of their personal information, and will be given access to that information. A member is entitled to question the accuracy and completeness of the information and have it amended as appropriate.
- 10) Challenging Compliance – A member will be able to question compliance with the above principles to the Privacy Officer accountable for the credit union’s compliance. The credit union will have policies and procedures to respond to the member’s questions and concerns.

The credit union will identify internally and to the system, the designated Privacy Officer and their alternate, who is responsible for the organization’s day-to-day compliance with the principles.

If a proposed purpose is significantly different than existing purposes, or involves a new disclosure to a Third Party, it will be approved by the Board of Directors. The Board will consider any privacy impacts on the credit union and individuals as a result of using personal information for this new purpose.

Reporting Requirements:

The Privacy Officer will prepare an annual report to the Board of Directors on the effectiveness of the Protection of Personal Information policies and procedures and will report any material that is not compliant.

The report will be provided to the Board of Directors within four months of the end of each calendar year.

Privacy Officer:

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