



# HRASSOCIATES

HR Associates strives at all times to provide high-quality services in a way which holds true to the principles of dignity, independence, integration and quality of opportunity as set out in the Accessibility for Ontarians with Disabilities Act, 2005.

Copies of the HR Associates Privacy Policy are available in alternate accessible formats upon request. In addition, HR Associates will provide any other employee document or communication in an accessible format if requested, including any of the related documents referenced in this policy. To request an accessible copy, please contact the HR Associates Accessibility Officer at [accessibility@hrassociates.ca](mailto:accessibility@hrassociates.ca) or at 416-237-1500.

## HR Associates Privacy Policy

### Policy Statement

HR Associates is committed to protecting the privacy of all our stakeholders, including our clients, third-party employers, job candidates, temporary employees, internal employees, and others. To comply with the *Personal Information and Protection of Electronic Documents Act*, 2000 and other applicable privacy legislation, HR Associates will protect the privacy and confidentiality of our stakeholders through the appropriate secure collection and storage of personal information at all times.

### Description

The *Personal Information and Protection of Electronic Documents Act*, 2000 (PIPEDA) establishes rules of private organizations to govern the collection, use and disclosure of personal information in a manner that recognizes the right of privacy of individuals with respect to their personal information.

The *Freedom of Information and Protection of Privacy Act*, 1990 (FIPPA) sets out regulations for protecting the privacy of individuals' personal information held in government records. As HR Associates is a service provider organization within the meaning of section 17.1 of the *Ministry of Government Services Act*, 1990, HR Associates is subject by applicable regulations of FIPPA.

The *Policy* outlines the procedures for HR Associates' protection, retention, and release of personal information, including the appointment of a Privacy Officer, the handling of complaints and corrections, accessing personal information, and procedures for addressing confidentiality breaches.

### Scope

The HR Associates Privacy Policy applies to HR Associates and divisions of HR Associates, including the Ontario Water Wastewater Certification Office (OWWCO) and CertiMetrics.

HR Associates is a designated service provider to the Ministry of Environment and Climate Change (MOECC) for the administration of OWWCO. OWWCO abides by third party Privacy requirements as contractually required by the MOECC.



## Definitions

### ***“Personal Information”***

Under PIPEDA, “personal information” means information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization.

### ***“Privacy Officer”***

Under PIPEDA, a Privacy Officer is a designated official of an organization who is responsible for personal information under the organization’s control and is accountable for the organization’s compliance with the 10 principles of PIPEDA (accountability; identifying purposes; consent; limiting collection; limiting use, disclosure, and retention; accuracy; safeguards; openness; individual access; challenging compliance).

### ***“Service Provider Organization”***

Under the Ministry of Government Services Act (MGSA), a service provider is defined as a ministry, part of a ministry or a person or entity designated under subsection 17.1 (1) of the Act. As HR Associates is an entity as an organization to provide services to members of the public on behalf of the Government or a public body” under the meaning of subsection 17.1 of the MGSA, HR Associates is considered a service provider organization. Service provider organizations fall under the definition of ‘institution’ and are subject to FIPPA.

## Questions and Complaints: The HR Associates Privacy Officer

HR Associates takes responsibility for protecting all personal information under our control, including information transferred to a third party for processing.

Questions about *HR Associates Privacy Policy*, requests for access to personal information, or to file a complaint regarding the collection, use, and disclosure of personal information, should be directed to the Privacy Officer.

### ***Contact Information:***

Email form: <https://hrassociates.ca/privacy/>

Phone: 416-237-1500



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## Collecting Personal Information

### Identifying Purposes

The purposes for which personal information is collected will be identified, disclosed, and documented by HR Associates at or before the time the information is collected.

When personal information that has been collected is to be used for a purpose not previously identified, the new purpose will be identified prior to use. Unless the new purpose is required by law, the consent of the individual to authorize the collection of information is required before HR Associates can use the information for its new purpose.

### HR Associates on the Web

Visitors to [www.hrassociates.ca](http://www.hrassociates.ca) may, at times, be asked to provide personal information to increase functionality of the site, when filling out application forms, to register for services, and when submitting inquiries, comments, and/or complaints. Individuals may be asked to provide contact and identifying information for the purposes of facilitating correspondence and to provide prompt replies to inquiries, such as name, email, date of birth, location (i.e., city, province, postal code), street address, telephone number and resume information. This information may be retained for customer service purposes and to provide future correspondence/assistance as necessary.

### How we collect, use, and disclose individuals' personal information when they visit [www.hrassociates.ca](http://www.hrassociates.ca):

**Cookies:** A cookie is a small file containing data specific to a website that is stored on your computer's hard drive and is sent to your browser. Cookies typically contain an anonymous unique identifier, which allows the web server and the client's computer to access data contained in the cookie. Cookies are used to tailor websites to users' specific preferences and to improve the functionality and user experience of visitors to websites. HR Associates does not track any cookies from visitors to [www.hrassociates.ca](http://www.hrassociates.ca).

**Third party links:** We provide links to third party sites that we do not own or operate. HR Associates will not share any personal information provided on our website with these third party websites without individual consent. HR Associates is not responsible or liable for third party links or the ways in which these third party sites collect, use and disclose personal information, which are subject to their own privacy and security measures and policies.

**IP addresses:** HR Associates does not track IP addresses of visitors to [www.hrassociates.ca](http://www.hrassociates.ca). However, our Internet Service Provider tracks the service provider IP addresses affiliated with visitors to our site. IP addresses are used to compile statistical summaries and traffic reports and are only disclosed to HR Associates in aggregate form. Our cloud-based form builder (Wufoo) tracks IP addresses of individuals who fill out public online forms linked through [www.hrassociates.ca](http://www.hrassociates.ca) for the purposes of collecting aggregate statistical information and to improve functionality of the form (e.g., in cases where entries are limited to one per user). HR Associates owns all data submitted through online forms, and HRA and our cloud-based form builder does not utilize any of the submitted data for marketing or profit purposes. All of our online forms linked to [www.hrassociates.ca](http://www.hrassociates.ca) are voluntary.

**Internet Tracking:** Our Internet Service Provider uses internet tracking tools to provide



aggregate site statistics to determine functionality, traffic, and the volume of visitors to our site. We use this information to improve the functionality of our site and the services we provide to our visitors. All statistics are logged in aggregate form and no personal identifying information is collected, used, or disclosed through the tracking software.

**Subscription opt-out:** we allow our contacts who receive email communications from us to 'opt-out' by clicking on the unsubscribe button at the bottom of each email. Individuals may also contact the HR Associates Privacy Officer to opt-out of email communications.

## Consent

HR Associates will obtain consent from individuals for the collection of their personal information and the subsequent use or disclosure of this information. HR Associates will advise individuals the purpose for which the information will be used. Personal information will not be released to third parties without written consent of the individual, unless the release is subject to exceptions including: if the information is required to investigate, prevent, or take action regarding illegal activities, a breach of an agreement or other contravention of law.

## Limiting Collection

The collection of personal information will be limited to that which is necessary for the purposes identified by HR Associates, including the amount and type of information collected. HR Associates will only receive and store the information that is voluntarily supplied by the individual with their knowledge and consent of the purpose for which it is being supplied. When information is no longer required to fulfill its intended purpose, HR Associates will render the information anonymous, will delete, or destroy the information in a way which is nonreversible to prevent further access or use of the information.

## 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 individual or as required by law. Personal information will be retained only as long as necessary for the fulfillment of those purposes. If HR Associates uses the personal information for a new purpose, we will document this purpose and will ask individuals for their authorization/consent to use their information for the new purpose, unless the release is subject to exceptions (refer to the Consent section above).

## Ensuring Accuracy of Personal Information

Personal information collected by HR Associates will be as accurate, complete, and up-to-date as is necessary for the purpose for which it is to be used. Individuals may request to update their personal information we have on file by contacting our office.

## Securing Personal Information

Personal information collected by HR Associates is protected by security safeguards appropriate to the sensitivity of the information. To prevent unauthorized parties from gaining access to personal information, we take measures to destroy/delete information including



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regular shredding of documents and deleting electronic files. We only retain information for the maximum retention rates as required by law.

## **Being Open about our Privacy Policies and Practices**

HR Associates will make readily available to individuals specific information about its policies and practices relating to the management of personal information. Individuals can acquire information about HR Associates policies and practices related to privacy by contacting the HR Associates Privacy Officer or by reading the Privacy Policy on the HR Associates website (refer to <http://www.hrassociates.ca/privacy> ).

## **Providing Access to Personal Information**

Upon request, HR Associates will inform an individual of the existence, use, and disclosure of his or her information and the individual will be given access to that information. The individual will be able to challenge the accuracy and completeness of the information and HR Associates will amend it as appropriate. To request individual access, written requests should be forwarded to the HR Associates Privacy Officer.

## **Freedom of Information and Protection of Privacy Act Requests**

HR Associates will comply with the *Freedom of Information and Protection of Privacy Act* with regards to written requests for access to information for which HR Associates maintains the custody and control, and for which are covered by the *Act*. Requests for access to information must be filed with HR Associates in accordance with the access procedures under section 24 of FIPPA.

Individuals may request to update their personal information we have on file by submitting a request in writing to our Privacy Officer.