



Policy Name:	Privacy Policy	
Section:		
Issued By:	Human Resources/Information Technology	Effective Date: TBD
Approved By:	Board of Directors	Last Revised Date: January 28, 2019

The Retired Teachers of Ontario/Les enseignantes et enseignants retraités de l'Ontario (RTO/ERO) is committed to protecting the privacy of personal information.

RTO/ERO staff are authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained. We value the trust of those who deal with us, and we strive to maintain the accuracy, confidentiality and security of their personal information.

Limiting collection

RTO/ERO will limit the amount and type of personal information collected to that which is necessary for identified purposes. Personal information will be collected by fair and lawful means.

All personal information provided to RTO/ERO is confidential. Information collected becomes the exclusive property of RTO/ERO.

Collecting information required for programs and services

RTO/ERO identifies the purposes for which personal information is being collected before or at the time it is collected.

RTO/ERO collects, uses and discloses personal information only for purposes that a reasonable person would consider appropriate in light of the circumstances. For example, we collect and use personal information for the following purposes:

- Provision of RTO/ERO programs, services and information
- Identification of the needs of RTO/ERO's membership
- Delivery of personalized programs and services
- Dissemination of information about our conferences, other events and activities
- Distribution of print and digital publications
- Accounting services and billing related to RTO/ERO operations
- Provision of member communication, service and administration

- Administration of expense claims
- Follow-up to individual correspondence and requests
- Internal and regulatory audit purposes
- Legal and regulatory compliance

RTO/ERO collects personal information from non-members when they register for various workshops in order to register the individual for the event and to communicate with the registrant regarding the event.

Personal information is collected, using a consent-based approach, from non-members who are interested in receiving more information from RTO/ERO (for example, to mail an information package). When new members join RTO/ERO, personal information is collected to deliver member programs and services.

Protection of personal information

RTO/ERO takes all necessary precautions to ensure that personal information is safeguarded and used only for the purpose(s) for which it was provided, whether it is stored in electronic or paper format. In all cases, information is protected from unauthorized access and kept only as long as is reasonably required.

Methods of protection include physical measures (for example, locked filing cabinets and restricted access to offices), organization measures (for example, limiting access on a “need to know” basis), technological measures (for example, the use of passwords and encryption) and contractual measures (for example, ensuring that any third parties that store records are contractually bound to adhere to the RTO/ERO privacy policy).

- Personal information is maintained on secured networks and is only accessible by a limited number of persons who have special access rights to such systems. Confidentiality agreements are signed at the time of employment.
- Electronic files are password protected and accessible only by authorized employees on a need-to-know basis.
- All sensitive information is encrypted via Secure Socket Layer (SSL) technology.
- RTO/ERO does not use vulnerability scanning and/or scanning to PCI standards.
- An external PCI compliant payment gateway handles all CC transactions.
- Malware scanning is employed as a data security feature.
- RTO/ERO implements a variety of security measures when a user enters, submits, or accesses their information to maintain the safety of your personal information.
- All financial transactions are processed through a gateway provider. RTO/ERO does not store or process personal financial information on its servers.

Use of Members Information shared with RTO/ERO Volunteers

RTO/ERO distributes limited information to the volunteers of RTO/ERO for the purpose member recruitment and the distribution of email and mailed district information. The information shared is basic name, address, member's status, age, email address.

- Emailing Newsletters
- Sending Birthday Cards, Welcome Kits and general regional information

RTO/ERO will never share private information such as birthday, social insurance number (if on file) or any credit information. It is the sole responsibility of the volunteer to destroy the information once used and never share the information. All information once used is electronically shredded, and/or paper copies destroyed.

Use of Photographic artwork

RTO/ERO exclusively uses Shutterstock for all photographic permissions and generic photo stock. Each volunteer has access to share information off this licensed site. It is the responsibility of any RTO/ERO employee or volunteer to get the exclusive rights, in writing, for the use of any artwork other than Shutterstock.

What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by website owners in order to make their websites work, or to work more efficiently, as well as to provide reporting information.

Why do we use cookies?

RTO/ERO uses cookies for several reasons. Some cookies are required for technical reasons in order for our Online Properties to operate, and we refer to these as "essential" or "strictly necessary" cookies. Other cookies enable us to track and target the interests of our Users to enhance the experience on our Online Properties. Third parties serve cookies through our Online Properties for advertising, analytics and other purposes

How to refuse cookies?

Because these cookies are strictly necessary to deliver the Online Properties to you, you cannot refuse them.

You may block or delete them by changing your browser settings. This is the responsibility of the user and that user should reference the browser help documentation.

Analytics and customization cookies:

These cookies collect information that is used either in identifiable or aggregate form to help us understand how our Online Properties are being used, the effectiveness of our marketing campaigns, or to help us customize our Online Properties for you.

RTO/ERO's website uses cookies to:

- Understand and save users' preferences for future visits

- Help remember and process the items in the shopping cart.
- Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. Trusted third-party services may be used to track this information on RTO/ERO's behalf.

Through browser settings, users can choose to receive an alert each time a cookie is being sent, or they can choose to turn off all cookies. Since each browser is unique, users are encouraged to view their browser's Help Menu to learn the correct way to modify cookies.

RTO/ERO never combines information gathered from a cookie with personally identifiable information like name, telephone number, or e-mail address, without consent.

No third-party disclosure of personal information

RTO/ERO does not sell, trade, rent or otherwise transfer personal information to third-party organizations.

RTO/ERO obtains consent before using or disclosing personal information for any purpose, except where the law provides an exemption. In exceptional circumstances, personal information may be shared with law enforcement agencies, in emergencies, where required by court order or search warrant or as required by legislation in all provinces and territories in Canada.

CASL

Canada's Anti-Spam Legislation (CASL) establishes the rules and requirements for commercial email messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

RTO/ERO conducts its business communication in compliance with CASL and is committed to the following:

- Include the business address in email messages
- Identify advertising message in some reasonable way
- Provide instructions for unsubscribing in every email
- Allow users to unsubscribe by using the link at the bottom of each email.
- Honour opt-out/unsubscribe requests immediately
- Refrain from use of false or misleading subjects or email addresses

It is important to note that RTO/ERO members cannot unsubscribe from "transactional" emails (for example, membership invoices).

Access to individual's own personal information

RTO/ERO will provide information to individuals about its policies and procedures relating to the management of personal information. On written request, RTO/ERO will inform an individual of the existence, use and disclosure of any personal information that RTO/ERO holds and will provide the individual with access to that information. Individuals are entitled to challenge the accuracy and completeness of personal information that is held by RTO/ERO and to request that it be amended, as appropriate.

Accuracy

RTO/ERO makes a good faith effort to ensure that personal information under its control is as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used. To assist in this regard, RTO/ERO urges its members and subscribers to provide updates regarding such information and to inform RTO/ERO of any errors affecting the personal information that is held by RTO/ERO.

Accountability

RTO/ERO is responsible for protecting the personal information under its control and has designated an individual to be accountable for compliance with these policies.

Inquiries or Complaints

If there are questions or concerns about personal information that is held by RTO/ERO, or for information about RTO/ERO's privacy policies and procedures, please write to:

Attention: Privacy Officer
RTO/ERO
18 Spadina Road
Toronto, Ontario, Canada
M5R 2S7
Privacy-officer@rto-ero.org

Add to Privacy Policy a disclaimer around confidentiality to all report emails that get sent to district representatives. This disclaimer is to outline that these reports are not to be shared with anyone outside a role designated to receive this information. Sylvia to assist Charles with this disclaimer text.	Charles Tabone Anna Lunghi Sylvia Link	Bring updated draft of policy to Feb. 1 meeting	In progress
Add to Privacy Policy a section titled “District Privacy Policy” to include information for districts on topics including: <ul style="list-style-type: none"> • photography permissions • access and restrictions to confidential member information • shredding confidential documents • how member information can be included in newsletters and on websites • best practices (ie. Shutterstock for generic stock images, not Google). • Privacy is a risk management issue – it is the responsibility of RTO/ERO to protect member information, any way that it is shared beyond the office. 	Charles Tabone Anna Lunghi	Bring updated draft of policy to Feb. 1 meeting	In progress
Simon is working with lawyers on the process for districts sharing of “public” member information while respecting privacy. Simon to update the Communications Committee with any updates on this process and any final policies made will be added to the Privacy Policy once available.	Simon Leibovitz	Provide update at Feb. 1 meeting	In progress
Simon is addressing the potential for district executives to be required to sign a confidentiality agreement. This lies beyond the scope of the Communications Committee.	Simon Leibovitz	Provide update at Feb. 1 meeting	In progress
Charles will investigate the possibility of having a different send name (other than RTO Events) for each district and even internally at RTO/ERO office.	Charles Tabone	Provide update at Feb. 1 meeting	In progress
Committee to provide feedback to Charles on his internet security video. Does it have everything they are looking for, is there something missing that they’d like included in the video?	Committee Members	Provide feedback at Feb. 1 meeting	In progress
Committee to provide feedback to Charles on the reporting process and how reports are being used, in order for Charles to optimize this process.	Committee Members	Provide feedback at Feb. 1 meeting	In progress
Eastern Ontario Regional Communications Workshop <ul style="list-style-type: none"> • Marketing & Communications offered to assist with planning process • Gus and Mary Lou to provide Sylvia with date range, venue and back up venue (venues must be accessible and have Wi-Fi) 	Sylvia Link Stefanie Martin Gus Cammaert Mary Lou Smitheram	Provide update at Jan. 31 working session	In progress