Policy:	Privacy Policy
Effective Date:	Nov 2, 2018
Area of Responsibility:	Operations
Revision Date(s):	September 29, 2021; approved Dec 15, 2021; Governance Committee March 11, 2024; *Board March 20, 2024

1. **POLICY STATEMENT**

   The Association of Regulated Nurses of Manitoba (Association) has developed this privacy policy to demonstrate our accountability and commitment through a transparent policy regarding the collection, use, and sharing of personal information.

   The policy applies to all personal information that is not in the public domain that the Association has or will collect, use or share.

2. **PURPOSE**

   The Association values and respects the privacy of its members.

3. **SCOPE**

   The Association is committed to keeping personal information private and secure. Unless otherwise specified, or permitted by law, the Association does not collect, use or share information for anything other than the purpose for which it was intended or for another appropriate purpose that a reasonable person would consider appropriate in the circumstances.

4. **CRITERIA/GUIDELINES**

Accountability

The Association's privacy policy and practices comply with the *Personal Information Protection and Electronic Documents Act* (PIPEDA).

The Association is committed to the 10 principles outlined in PIPEDA of:
   1. Accountability
   2. Identifying Purposes

3. Consent
4. Limiting collection
5. Limiting use, disclosure and retention
6. Accuracy
7. Safeguards
8. Openness
9. Individual Access
10. Challenging compliance and appropriateness

Personal Information

- Personal information is information about an individual that identifies them. It includes name, age, gender, registration/identification number, address, email address and credit card information. Sensitive information such as opinions or evaluations is also considered personal information.
- Information that does not identify an individual is not personal information. For example, aggregate information about numbers of members in a membership category is not personal information.
- Information such as business address, professional title and any information that is available in the public domain is not personal information for the purpose of this policy.
- Information that is collected for purely artistic or literary purposes is also not considered personal information.

Collecting Information

The Association identifies the reason for collecting personal information before or at the time of collection. The Association collects the following information:

- Personal information from members through the membership application process including name, birth date, address, email address, registration status and communication preferences.
- Other information is collected to help understand the Association's membership as a whole, to develop programing and services such as area of practice, role, years of practice, years in practice, work environment, certification information and employer.
- Anonymous non-identifiable, non-personal information using cookie technology.
- Information from responses to requests for feedback or other comments on products and services.
- Information to register for programs, conferences, and meetings.

Use of Personal Information

The Association uses personal information to establish eligibility for membership in the Association and to communicate with members about member benefits and services, as well as:

- To communicate with members regarding member rights such as the right to receive information, notice regarding meetings of members, elections, changes to bylaws and programming.

- To provide members with member benefits.
- To understand members' needs for the purpose of developing programming and services.
- To provide members with information about the Association and their rights and benefits through electronic newsletters. Members can unsubscribe to electronic newsletters by using the UNSUBCRIBE function or contacting the Association directly.

Web logs

The Association tracks users' access through information collected in server logs. This information does not identify individual users, rather tracks general usage trends on the Association website.

Accuracy and Corrections

The Association ensures members' information is accurate by enabling members to review their personal information on their member profile and make needed edits at their convenience. The member profile is secure, and password protected by the member. The information in the Association database is taken directly from the information submitted and corrected by the member. Changes or corrections made to a member profile are tracked and logged.

Security

- Personal information is stored briefly on our webserver before it is transferred to our membership database (GlueUp) when a membership is processed. The online registration form is SSL encrypted to protect the information.
- Information on the Association's database is stored on a secure server in a secure facility in North America.
- Credit card information is collected by a third party through an SSL encrypted Internet connection. Credit card information is not stored by the Association.
- All electronic files are protected by firewall and password protected.

Withdrawal of Consent

- Members may withdraw consent to receiving any electronic publication sent to them using the UNSUBSCRIBE function or.
- Members can withdraw their consent to the collection, use or disclosure of their personal information by contacting the Association at info@arnm.ca or calling (204) 992-1520 or 1-844-355-1520 .
- If consent is withdrawn it may adversely affect the member's ability to maintain membership in the Association.

Retention and Destruction

- The Association retains information for only as long as is required to provide the services members are entitled to receive. This means that some information regarding membership in the Association and registration number and status will be retained for a period of up to 10 years.

- Information regarding attendance at meetings, professional development sessions, conferences or other events may be retained for a period of 5 years.
- Once the retention period expires, information is deleted in its entirety from the database and any other record in a secure manner. For example, paper documents are shredded.
- Credit card information collected for processing by manual transaction is shredded in batches no later than the end of the second business day in which the transaction took place.
- Before disposing of electronic devices such as computers, photocopiers, cellphones, the Association will ensure that all personal information contained thereon is fully deleted.

Privacy Officer : Executive Director
Issues or concerns related to this policy can be directed to:

Privacy Officer
Association of Regulated Nurses of Manitoba
PO Box 73027, RPO Bridgwater, Winnipeg, MB R3Y 2A9
Winnipeg: 204-992-1520
Email: info@arnm.ca

5. **REVIEW**

   Policy to be reviewed at least every three years.

6. **RELEVANT REFERENCE MATERIAL**

References:
Glue Up Privacy Policy *https://www.glueup.com/legal/privacy-policy*

Personal Information Protection and Electronic Documents Act S.C. 2000, c.5 (PIPEDA)
https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/r_o_p/

Office of the Privacy Commissioner of Canada (2024). *https://www.priv.gc.ca/en/*

Registered Nurses Association of Ontario (2022), *Privacy Policy.* Ontario: Author. Available from https://rnao.ca/about/privacy-policy