



PMI-RSSC Privacy Policy		
CATEGORY: Global	SUBJECT: Privacy Policy	NO: 105

Policy: Privacy Policy

Purpose / Background:

PMI R/SSC collects personal information from both its members and non-members who attend chapter functions (customers). Our relationship with our members and customers depends a great deal on trust. Trust begins with our commitment to respecting and protecting their privacy and personal information.

Personal Information

Personal information means information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee or of an organization.

Policy Description:

PMI Regina/South Saskatchewan Chapter will protect the personal information of its members and customers, and will ensure that privacy management is an integral part of its operations. PMI R/SSC's privacy policy is based on the *Canadian Standards Association (CSA) Model Code for the Protection of Personal Information*. This policy applies to all Board members, employees, and volunteers of PMI R/SSC and all agents and other third parties acting on behalf of PMI R/SSC.

PMI R/SSC's privacy policy is generally consistent with the *Saskatchewan Freedom of Information and Protection of Privacy Act* and with the *Federal Personal Information Protection and Electronic Documents Act*. As a non-profit organization that does not engage in commercial for profit activities that are not central to our mandate, the provisions of *PIPEDA* do not directly apply to our organization. However we share the concerns of these pieces of legislation that individual information must be protected from disclosure or abuse. At time of writing, *PIPEDA* can be found on-line at <http://laws-lois.justice.gc.ca/eng/acts/P-8.6/>.

PMI R/SSC's privacy policy is consistent with the PMI privacy policy (available from <https://www.pmi.org/privacy>).

1) **Accountability:** PMI R/SSC's President is the *Chief Privacy Officer*, and is the person that the organization has delegated with overall responsibility for the chapter's compliance with privacy policy and applicable privacy restrictions. To contact the Chief Privacy Officer, write to:

Chief Privacy Officer
c/o PMI R/SSC
Box 3181
Regina, SK
S4P 3G7
E-mail: info@pmisouthsask.org

2) Identifying Purposes:

The Chapter receives member Personal Information directly from PMI. The information is automatically downloaded from the PMI website and then automatically uploaded to the Chapter website. The Chapter has access to Personal Information about PMI and/or Chapter Members which PMI collects and makes available to the Chapter through its website, which is password protected and secure. The Chapter also collects personally identifiable information through its website, events, and programs.

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PMI R/SSC collects name, address, email address, phone number, fax number, title, industry group, occupation, employer, opinions on our products and services, billing information, and membership's PMP status for the following purposes:

- To establish and maintain a responsible relationship with members and customers and to provide them with ongoing service;
- To understand members and customers' needs, and to develop and recommend suitable products and services;
- To provide members and customers with marketing information that we think may be of interest to them;
- To verify membership with the Chapter;
- To conduct communication with Members concerning chapter events, administration, operations, or information about a Member's status;
- To provide Members with account access to the Chapter website;
- To conduct opinion surveys with Members to improve our offerings;
- To study summary demographic information about Chapter;
- To conduct event, service, or program registration;
- To conduct event, service, or program payment processing.

Note: PMI R/SSC must obtain consent from the member or customer prior to using their personal information for any other purpose.

Children's Personal Information

PMI R/SSC acknowledges the importance of, and is committed to upholding, the privacy of children. For that reason, we never collect or maintain information at our website from those we actually know are under 13 years of age, and no part of our website is structured to attract anyone under 13.

3) **Consent:** The knowledge and consent of members and customers are required for the collection, use, or disclosure of personal information.

By providing PMI with Personal Information when registering for membership, individuals consent to the collection, use, and disclosure of that information under PMI privacy guidelines, as well as guidelines outlined in this Policy. In circumstances where the Chapter collects additional Personal Information, individuals will be asked to consent orally, in writing, or electronically, or in some circumstances consent may be implied. Individuals may refuse to give Personal Information or withdraw their consent. However the Chapter reserves the right to refuse participation in a specific event, service, or program should consent be denied or withdrawn.

If a Member is also a Volunteer, the Chapter may collect, use, or disclose Volunteer Personal Information without consent if it is reasonable for the purposes of establishing, managing, or terminating a Volunteer relationship between the Chapter and the individual. In such cases the Chapter will notify the individual of the collection, use, or disclosure of such information.

4) **Limiting Collection:** PMI R/SSC shall only collect personal information as identified in 2).

5) **Limiting Use, Disclosure, and Retention:**

PMI R/SSC will not sell, rent, make available, give away or otherwise disclose personally identifiable information of its members to a third party without the written consent of the member(s). The Chapter is under no obligation to seek consent of members on behalf of any sponsor or third party.

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PMI R/SSC will not release personal information to anyone outside of PMI R/SSC Board of Directors, except in the following circumstances:

- PMI Global as required to maintain the membership database;
- Volunteers providing registration, marketing or other chapter related services;
- Agents acting on behalf of PMI R/SSC – such as a company hired to provide seminars on PMI R/SSC's behalf or to provide a registration service;
- Agents acting on behalf of the member or customer;
- Emergency services in emergency situations.

The Chapter may disclose Personal Information where authorized by this policy or required by law (for example a court order, subpoena, or search warrant), to protect and defend the rights or property of the Chapter, or under exigent circumstances to protect the personal safety of Chapter Members or the public. The Chapter may disclose Personal Information to third party organizations retained by the Chapter in order to provide a service to Chapter Members, PMI Members, or the public. In such instances, the Chapter will ensure that appropriate legal agreements are in place committing the third party providing the services to adhere to this Policy. The Chapter may disclose Personal Information to service organizations it makes use of, for example for email distribution, Canada Post mail, event registration services, and survey services.

Third Party Obligations:

- PMI R/SSC will provide third parties with only the personal information they need to perform legitimate duties or work that PMI R/SSC has requested of them.
- Employees of the companies to whom PMI R/SSC may provide information must uphold PMI R/SSC's privacy policy and standards.
- Third parties are not permitted to disclose personal information to other parties, or use the information for any purpose except to provide the service requested by PMI R/SSC.
- PMI R/SSC will take reasonable steps to keep a record of information that is disclosed to third parties.

Personal information shall be retained only as long as necessary for the fulfillment of those purposes. Membership information is permanently retained by PMI Global on our behalf. Information on members and customers who attend our events or receive our services, and information on chapter volunteers are retained for as long as is necessary to validate recertification requirements.

The Chapter will retain event specific Personal Information for at least three years, as required for validation of attendance for recertification. The Chapter may hold information for an indefinite period of time if that information is transmitted to the Chapter from PMI. Additional information collected by the Chapter, but not transmitted from PMI will only be retained as long as necessary to fulfill purposes identified in this policy, for legal or Chapter operational purposes.

6) **Accuracy:** The Chapter will make reasonable efforts to ensure that the Personal Information we collect, use, or disclose is accurate and complete. Individuals wishing to correct any errors or omissions concerning their membership data must do so through PMI as the Chapter is not the original system of record for this information. Individuals wishing to correct any errors or omission concerning data which the Chapter has collected directly may do so in email to the Chapter. As soon as reasonably possible, the Chapter will: correct the information in our records; send the corrected information on any organization it was disclosed to in the year before the information was collected; or, if such a correction is not possible, the requested correction will be noted on copies of the Personal Information under the Chapter's custody or control.

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7) **Safeguards:** Regularly scheduled backups, an effective firewall and anti-virus software will be used to protect personal information in electronic databases.

The Chapter is committed to ensuring the privacy of member's Personal Information. To prevent unauthorized access or disclosure, maintain data accuracy, and ensure the appropriate use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online. We use encryption when collecting or transferring sensitive data online such as credit card information. The Chapter makes every effort to use reasonably secure methods whenever Personal Information is destroyed.

Access to some services and content is password protected. The Chapter recommends that members do not divulge their password/login to anyone. The Chapter will never ask members for their password in an unsolicited phone call or in an unsolicited email. Members should not disclose their user name and password to others. In addition members should remember to sign out of their website account or any other Chapter-related services at the end of each session. Members may also wish to close their browser window when they have finished their work. This is to ensure that others cannot access Personal Information and correspondence if access was through a shared computer when using a computer in a public place like a library.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. Accordingly, despite the our best efforts to protect member's Personal Information, the Chapter cannot completely ensure or warrant the security of any information that is transmitted to us, or to or from our online products or services. All such information is transmitted at your own risk. However, once we receive the transmission, we make our best effort to ensure its security on our systems.

Personal Information is available through the following media:

1. The PMI website. This site is protected by username/password authentication. Data is available to only limited personnel, typically officers or paid contractors of the Chapter.
2. The Chapter website. This site is protected by username/password authentication. Data is available to only limited personnel, typically officers or paid contractors of the Chapter.
3. Email distribution. The email marketing site is protected by username/password authentication. Data is only available to limited personnel overseen by an officer of the Chapter.

Use of Cookies

The Chapter web site uses "cookies" to help you personalize the online experience. A cookie is a text file that is placed on the hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to a member's computer. Cookies are uniquely assigned to the accessing computer, and can only be read by a web server in the domain that issued the cookie. One of the primary purposes of cookies is to provide a convenience feature to save the member time. The purpose of a cookie is to tell the web server that they have returned to a specific page. For example, if when a member personalizes Chapter web pages, or register with Chapter services, a cookie helps us to recall the member's specific information on subsequent visits. This simplifies the process of recording member's Personal Information, such as billing address, shipping address, et cetera. When the member returns to the same web site, the information provided previously can be retrieved so the member can easily use the features that they have customized. The member has the ability to accept or decline cookies. Most web browsers automatically accept cookies, but a user can usually modify their browser setting to decline cookies if they prefer. If they choose to decline cookies, they may not be able to fully experience the interactive features of the Chapter services or web sites they visit.

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Use of Google Analytics or other web traffic analysis tools

Google analytics or other traffic analysis tools may be used to monitor website traffic on www.pmisouthsask.org. The user’s IP address and referrer information may be collected by Google or other third parties and aggregated to allow detailed statistics of our website visitors to be produced for the Chapter. Only website administrators have access to this information and the site is username and password protected.

Third Party Safeguards

Where PMI R/SSC uses the services of other companies to provide services to PMI R/SSC members or customers, such as Communications and Information Technologies, PMI R/SSC will use contracts requiring those companies to maintain the same or a higher level of privacy standards as those required by PMI R/SSC. Any personal information provided by PMI R/SSC must be used only for the purposes described in the contract, appropriately safeguarded, and must be returned to PMI R/SSC on conclusion of the work or contract, or destroyed.

Use of Images

Chapter event participants understand and consent that photographs or video of them participating in Chapter events may be taken and included in Chapter communication and promotional material. The names of individuals shown in images or video will not usually be included in the communication or material unless the individual is a Chapter Board Member or Volunteer. Members or Non-members may request that images be removed from the Chapter communication or material by contacting the Chapter through the Chief Privacy Officer.

Personal Financial Information

- *The technology of the chapter* – The chapter’s technology consists of its physical electronic assets as well as its chapter data, including member data, and access to PMI and chapter online resources.
- *Credit and debit cards* – the chapter and the 3rd party that provides the chapter’s website and web hosting services do not store anyone’s debit or credit card numbers. When members and non-members alike register for chapter sponsored events, they do so through the chapter’s gateway and merchant services provider. The chapter and its website do not acquire or store debit or credit card numbers for any reason, ever.

Policy:

- The chapter will never acquire or store debit or credit card numbers for any reason.
- Only members of the chapter are authorized to have access to chapter technology.
- Access to chapter technology (physical assets, online data sources, and chapter data) must be granted in writing by a member of the Board of Directors. A written authorization to have access to, and use, chapter technology must come from the Board member who is sponsoring the member. It should be in email format and copy the VP Communications. It should: (1) list the specific assets that are included in the authorization and (2) emphasize that chapter technology is only to be used for chapter activities.
- The authorizing Board member and the VP Communications will jointly maintain a copy of active authorizations on a shared folder in Board of Directors section of the Briefcase. Authorizations may be terminated by either the sponsoring Board member or the VP Communications at any time. Authorizations will be automatically rescinded as part of the deboarding process.
- Board members who grant access to chapter technology are responsible for ensuring that chapter technology is used appropriately by those to whom they have granted access.

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- Chapter volunteers who have been granted the use of physical assets will maintain such assets with reasonable care. Such persons must be able to produce such assets for a random inspection at the discretion of the Vice President of Communications and/or the sponsoring Board member.
- In the event there is a breach of security of any type involving a credit / debit card reader that is used by the chapter or, if it is learned that a chapter member is collecting and storing debit or credit card numbers, the chapter member who learns of the breach must immediately report it to their Board member. The Board member is then responsible for immediately reporting the breach to the chapter's President and VP Finance who will then notify the bank and the local police department of the issue. If the name and location of the person who obtained credit card data without authorization are known, then the VP Finance must also report the breach to the police department in that city.

Board Member, Employee and Volunteer Awareness

PMI R/SSC will ensure that all new Board members, contractors, agents and volunteers who have access to personal information will be made aware of the Privacy Policy as part of their chapter orientation.

8) **Openness:** PMI R/SSC will make available specific information about its policies and practices relating to the management of personal information to individuals upon request.

9) **Individual Access:** Members and customers may review or verify their personal information kept by PMI R/SSC by contacting the Chief Privacy Officer.

Individuals have the right to access their Personal Information under the Chapter's custody or control. Request for access must be made through email. However the Chapter may require proof of identify before granting this request. When such a request is made, the Chapter will give individuals the Personal Information under the Chapter's control, information about how the information is or has been used, and the names of the individuals and organizations to which their Personal Information has been disclosed.

The Chapter reserves the right, to charge a minimal fee, payable in advance, to cover the costs of collection and delivery of such information. Following the request and confirmation of identity, the Chapter will provide the information within 30 (thirty) business days.

The Chapter may where authorized or required by this policy or relevant PMI or other privacy policies, refuse to disclosed certain Personal Information. If an access request is refused, the Chapter will inform the applicant in writing, stating the reasons for such refusal. In such an instance the Chapter will outline further steps available to the applicant, including an internal review and/or a review by the Office of the Information and Privacy Commissioner for Saskatchewan.

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10) **Challenging Compliance:** Individuals shall be able to address a challenge concerning compliance with the above principles to PMI R/SSC by contacting the Chief Privacy Officer. Complaints concerning the Chapter's treatment of Personal Information should be directed to the Chief Privacy Officer. Individuals who are not satisfied with the Chapter's response may complain to the Office of the Information and Privacy Commissioner for Saskatchewan.

Responsibility:

The President is responsible for this policy.

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