

The federal government enacted the Personal Information Protection and Electronic Document Act (PIPEDA) in 2000. PIPEDA extended privacy protection to personal information collected, used and disclosed for commercial purposes in the private sector and voluntary sectors. Full application of PIPEDA went into effect in January 1, 2004, although the Act previously applied to certain federally-regulated and inter-provincial transactions.

Our Commitment

The Royal Ontario Museum (ROM) Governors are committed to adhering to the principles of PIPEDA thereby protecting the privacy of the personal information of its employees, members, directors, donors, volunteers and other stakeholders. The ROM Governors values the trust of those we deal with, and of the public, and recognizes that maintaining this trust requires that we be transparent and accountable in how we treat the information that individuals choose to share with us.

During the course of our various fundraising activities and events, the ROM Governors frequently gathers and uses personal information. Anyone from whom we collect such information should expect that it will be carefully protected and that any use of or other dealing with this information is subject to consent. The ROM Governors' privacy practices are designed to achieve this.

It is important to note that the ROM Governors shares a special relationship with the Royal Ontario Museum, as associated charities, and where appropriate, shares information.

Defining Personal Information

Personal information is any information that can be used to distinguish, identify or contact a specific individual. This information can include opinions or beliefs, as well as facts about, or related to, the individual. Exceptions include business contact information and certain publicly available information, such as names, addresses and telephone numbers which are published in telephone directories, and therefore not considered personal information.

Policy Principles

The model code for the Protection of Personal Information forms the backbone of PIPEDA. The ROM Governors has adopted the model code developed by the Canadian Standards Association containing the following 10 principles to be respected.

1. Accountability

- a. The ROM Governors are responsible for all personal information under its custody or control.
- b. A Chief Privacy Officer(s) will be appointed and accountable for the ROM Governors' compliance with the following principles.
- c. The Governors will ensure third party contracts (telemarketing, mail houses, freelance writers and designers, etc.) contain a provision explicitly requiring their adherence to PIPEDA.

- d. A privacy manual will contain purpose statements for the various methods and reasons used by the ROM Governors to collect personal information on donors, prospects, volunteers and board members.

2. Identifying Purpose

- a. The ROM Governors, at or before the time personal information is collected, will identify purposes for which personal information is collected.

3. Consent

- a. The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information.
- b. The ROM Governors will provide a means to allow individuals to easily withdraw consent at any time and ensure that procedures are in place to respect this request.

4. Limiting Collection

- a. The collection of personal information shall be limited to that which is necessary for the purposes identified by the ROM Governors.
- b. Information shall be collected by fair and lawful means.

5. Limiting use, disclosure and retention of personal information

- a. 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.
- b. Personal information will be retained only as long as necessary for the fulfillment of those purposes.
- c. All donors will be recognized for their gifts in accordance with the Governors' donor recognition policy unless the donor wishes to remain anonymous.

6. Accuracy

- a. Personal information will be as accurate, complete and up-to-date as is possible for the purposes for which it is to be used.

7. Safeguards

- a. The ROM Governors will utilize physical measures (locked filing cabinets, restricted access to offices, etc), organizational measures (security clearances, “need-to-know” access, etc.) and technological measures (passwords, encryption, etc.) for the protection of all personal information.
- b. All ROM Governors staff and volunteers are required to sign an agreement related to the confidentiality of personal information.

8. Openness

- a. The ROM Governors will make readily available to individuals specific information about its policies and practices relating to the management of personal information.
- b. The Privacy Statement will be posted on the ROM Governors' Website.

9. Individual Access

- a. Upon request, an individual will be informed of the existence, use and disclosure of his or her personal information and will be provided access to that information.
- b. An individual will be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

- c. Requests for access will be responded to by the Chief Privacy Officer, David K. Bell, in conjunction with the President and Executive Director of the ROM Governors, Dr. Marie Bountrogianni, in no more than 30 days.

10. Challenging Compliance

- a. An individual will be able to address a challenge concerning compliance with the above principles with the designated Chief Privacy Officer, Amy Rotteau.

Updating of Privacy Policy

The ROM Governors is currently reviewing its privacy practices for its various activities, and a revised and more comprehensive version of this policy will be made available on our website over the coming months. Upon completion, the ROM Governors are committed to reviewing the policy and the purposes for which we collect information on a bi-annual basis.

Contact Information

Questions, concerns or complaints relating to the ROM Governors' privacy policy on the treatment of personal information should be e-mailed to: governorsprivacy@rom.on.ca
Attention: Chief Privacy Officer

Further information on privacy and your rights in regard to your personal information may be found on the website of the Privacy Commissioner of Canada at www.privcom.gc.ca/