

# **COMMUNICATIONS, ENERGY AND PAPERWORKERS UNION OF CANADA**

## **PRIVACY POLICY STATEMENT**

### **CEP POLICY 919 (adopted by the Executive Board February 2004)**

The Communications, Energy and Paperworkers Union of Canada (CEP) recognizes that the workers we represent, our employees, and supporters value privacy as a fundamental right. In furthering these privacy interests, we have developed policies and procedures to safeguard personal information and to ensure that members, employees and others are aware of and consent to our collection, use, and disclosure of that information.

#### **Who We Are**

The CEP is one of Canada's largest private sector unions representing 150,000 workers in a wide range of occupations across Canada, in both the private and the broader public sector. We represent media workers, workers in the chemical and energy sector, pulp and paper workers, and telecommunications workers as well as nurses.

The objects of the CEP as established in our Constitution are:

To organize persons engaged within the jurisdiction of the Union and assist in the organization of all working people.

To improve wages, hours of work, employment security and other conditions of employment through collective bargaining.

To strive for equality regardless of race, creed, colour, age, marital status, family status, ancestry, place of origin, ethnic origin, citizenship, language, religious beliefs, sex, sexual orientation, disability, records of offence or political affiliation.

To assist in advancing the social, economic and general welfare of working people through political, educational, civic and other activities.

To safeguard, protect and extend freedom, civil liberties, democracy and democratic trade unionism.

To engage in political activities to secure beneficial legislation and obtain the defeat and repeal of harmful legislation.

To aid and co-operate with other trade unions and other organizations whose purposes are in accord with the purposes of this union, and to affiliate with organizations which meet our goals and to participate in such organizations.

## **What we do**

We work to advance the interests of members, non-members, employees and our supporters through collective action. We do so through:

- negotiating better wages and working conditions of members through collective bargaining;
- organizing workers in non-unionized workplaces;
- representing individual members in various legal or administrative proceedings to protect their rights in the workplace;
- administering health benefit plans;
- lobbying public officials for law reform; and
- social justice advocacy.

## **Principles to Guide the Collection, Use and Disclosure of Personal Information**

The CEP is guided by a number of important principles with respect to the personal information of individuals:

1. individuals are entitled to know the personal information that is being collected, used and disclosed;
2. individuals are entitled to know the purpose for which the information is being collected;
3. individuals may access the personal information to ensure its accuracy and may challenge its accuracy;
4. individuals must generally consent to the collection, use and disclosure of the information;
5. the CEP safeguards personal information; and
6. the CEP will establish procedures by which individuals may challenge the collection, use, disclosure and accuracy of the information.

## **Consent**

As a general rule, we will not collect, use or disclose individual's personal information without that person's consent. Consent is effective when the individual has been informed of the purposes for which the information is collected, used or disclosed.

There may be circumstances in which consent will not be possible to obtain. In those circumstances we may be required to collect, use or disclose personal information without the consent of the member or employee. Those circumstances include:

- when a court or administrative tribunal orders the disclosure of personal information;
- personal information is collected during the investigation into the violation of an agreement, such as a contract of employment, or a contravention of a law;
- personal health information is required to be disclosed in an emergency that threatens the life or health of an individual; and
- collection is clearly in the interests of the individual and consent cannot be obtained in a timely way.

### **Collection**

We collect only the information we need to adequately carry out our mandate. That information typically comes from the individual, but on occasion, we may receive the information from other sources.

That information may relate to:

- family status
- social insurance number
- income
- health information
- work history, attendance records, discipline records
- job classification, job duties, rates of pay, employee evaluations.

### **Use**

We may use personal information for the purposes related to the mandate set out above to advance the collective and individual interests of members and other workers. Those purposes include:

- a) to inform members, non-members, employees and supporters through newsletters and other forms of communication, such as electronic mail, of the activities of their union, and of important events that may have an impact on their work and relationship with the union and their employer;
- b) to determine appropriate wage levels to be paid to members;
- c) to assist in collective bargaining;
- d) to assist individuals in making sickness and accident claims; and

- e) to represent members in any grievances or other legal proceedings that may be brought on their behalf, arising from the collective agreement; and
- f) for social and political advocacy in accordance with the mandate set out in the CEP Constitution.

### **Disclosure**

The information we have collected from members and employees will not be disclosed without that person's knowledge and consent, unless legal obligations require us to disclose the information without knowledge or consent.

### **Third Party Service Providers**

Inevitably we may require third parties to provide services to the workers we represent and to our employees on behalf of the CEP. In many cases, disclosure of personal information to these third parties is unavoidable. We require that our third party service providers have privacy policies in place, which meet or exceed the standards set out in our privacy policy.

### **Safeguarding**

CEP maintains appropriate policies, procedures, and technical safeguards to protect personal information from loss, theft, and unauthorized access, disclosure, copying, use or modification.

### **Requests for Access**

CEP will endeavour to provide individuals with access to the information collected by CEP in respect of that individual at no cost or minimal cost and in a generally understandable form. However, there may be circumstances where legal requirements may not permit the CEP to provide access to the information.

Inquiries should be made in writing and addressed to:

Gisèle Pageau, Privacy Officer  
CEP National Office  
301 Laurier Ave, West  
Ottawa, ON K1P 6M6  
Tel: (613) 230-5200  
Fax: (613) 230-5801

## **Complaints Process**

An accessible and straightforward complaint procedure (see forms below) is established for individuals wishing to bring forward any concerns about the CEP's handling of his or her personal information. This process will include, in addition to written communication with the CEP Privacy Officer, an appeal of the Privacy Officer's decision to the President of the CEP.



**COMMUNICATIONS, ENERGY AND PAPERWORKERS UNION OF CANADA**

**ACCESS REQUEST  
CEP PRIVACY POLICY**

I, \_\_\_\_\_, request access to the following personal information \_\_\_\_\_, held by the Communications, Energy and Paperworkers Union of Canada.

Signature: \_\_\_\_\_ Telephone (h) \_\_\_\_\_

Address: \_\_\_\_\_ Telephone (w) \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Email: \_\_\_\_\_ Date: \_\_\_\_\_

**For office use**

Date received \_\_\_\_\_ by \_\_\_\_\_

Date acknowledged \_\_\_\_\_ by \_\_\_\_\_

Date of response \_\_\_\_\_ by \_\_\_\_\_  
(attach copy of response)



**COMMUNICATIONS, ENERGY AND PAPERWORKERS UNION OF CANADA**

**STATEMENT OF DISAGREEMENT  
CEP PRIVACY POLICY**

I, \_\_\_\_\_, assert that the information contained in the following document(s) is incorrect and/or incomplete for the following reasons.

*(Please provide as much detail as possible to assist us in correcting your personal information – use additional pages if necessary.)*

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\_\_\_\_\_

Signature: \_\_\_\_\_ Telephone (h) \_\_\_\_\_

Address: \_\_\_\_\_ Telephone (w) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Email: \_\_\_\_\_ Date: \_\_\_\_\_

**For office use**

Date received \_\_\_\_\_ by \_\_\_\_\_

Date acknowledged \_\_\_\_\_ by \_\_\_\_\_

Date of response \_\_\_\_\_ by \_\_\_\_\_  
(attach copy of response)



**COMMUNICATIONS, ENERGY AND PAPERWORKERS UNION OF CANADA**

**STATEMENT OF COMPLAINT  
CEP PRIVACY POLICY**

I, \_\_\_\_\_, wish to file a complaint under the CEP Privacy Policy.

*Please provide as much details as possible to assist us in investigating your complaint. For instance please tell us how your privacy rights were violated (release of confidential information to third party; improper storage of personal information, etc?) Attach any relevant documents to your complaint. Use additional pages if needed.*

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\_\_\_\_\_  
\_\_\_\_\_

Signature: \_\_\_\_\_ Telephone (h) \_\_\_\_\_

Address: \_\_\_\_\_ Telephone (w) \_\_\_\_\_  
\_\_\_\_\_

Email: \_\_\_\_\_ Date: \_\_\_\_\_

**For office use**

Date received \_\_\_\_\_ by \_\_\_\_\_

Date acknowledged \_\_\_\_\_ by \_\_\_\_\_

Date of response \_\_\_\_\_ by \_\_\_\_\_  
(attach copy of response)

