



# Privacy Policy

Sault Ste. Marie Economic Development Corporation (SSMEDC), and its divisions Development Sault Ste. Marie (DSSM), Enterprise Centre Sault Ste. Marie (ECSSM) and Tourism Sault Ste. Marie (TSSM) are committed to maintaining the privacy of its clients. Personal information of its clients will be kept *accurate, confidential, secure and private*.

SSMEDC is committed to meeting or exceeding the privacy standards established by federal and provincial regulations and industry bodies, and complies with the full requirements of the Federal Personal Information Protection and Electronic Documents Act (PIPEDA) effective, January 1, 2004.

The principles that SSMEDC follows ensure that it protects employees, volunteers and clients personal information when it collects, uses, or discloses it, in the course of carrying on commercial activities in Canada.

- SSMEDC gathers and uses personal information in order to provide clients with the requested services.
- Providing personal information is the client's choice. However, SSMEDC may not be able to provide clients with certain services if they do not have adequate contact information.

## What is Personal Information?

Personal information that is protected under the Personal Information, Protection and Electronic Documents Act includes factual or subjective information about identifiable individuals. It includes such factors as age, name, income, ethnic origin and blood type. It does not include the name, title, business address or business telephone number of an employee of an organization.

### Special points of interest:

- **How Information is Used**
- **How We Safeguard Information**
- **The Ten Privacy "PIPEDA" Principles**
- **Recourse—Questions, Concerns, Complaints**

## What Kind of Information SSMEDC Collects:

Providing personal information is the client's choice. However, SSMEDC may not be able to provide certain services if they do not have adequate contact information.

- The nature of the client's request will determine the kind of personal information SSMEDC might ask for. Information that is typically required to provide services may include such things as: name, address and phone number(s).
- When applying for services, clients may also be asked for specific financial credit history information
- SSMEDC may keep a file with client contact history—to be used for client inquiry purposes. This file would ensure client satisfaction with provided services.
- SSMEDC does *not* collect personally identifiable information about its clients at its website unless the clients provide it. All information supplied by clients is securely maintained and kept strictly confidential.

## How Information is Used:

SSMEDC uses personal information to communicate with clients in order to provide them with services. SSMEDC will only use personal information for the purpose disclosed to customers. If SSMEDC wants to use client information for a different purpose, clients will be notified and asked for consent first.

## How We Safeguard Information:

SSMEDC has extensive controls in place to maintain the security of its information and information systems.

Appropriate policies and controls (such as restricted access) are placed on SSMEDC's computer systems and data processing procedure. Physical access to areas, where personal information is gathered, processed or stored, is limited to authorized employees.

When a client telephones a SSMEDC employee (i.e., in the Enterprise Centre) to speak about his/her file, he/she may be asked for some personally identifiable information. This type of safeguard is designed to ensure that only the client or employee, or someone authorized by them, has access to the client's file.

# The Ten Principles of PIPEDA:

## PRINCIPLE 1: ACCOUNTABILITY

SSMEDC is accountable for all personal information in its possession or custody, including personal information disclosed to third parties for purposes of providing services requested by its customers. SSMEDC has designated an individual (“Privacy Compliance Officer”) who is accountable for SSMEDC’s compliance with the Ten Privacy Principles.

## PRINCIPLE 2: IDENTIFYING PURPOSES

SSMEDC will inform clients of the purposes for which it is collecting any personal information, before, or at the time the information is collected.

## PRINCIPLE 3: CONSENT

SSMEDC will obtain consent from its clients before, or when it collects, uses or discloses his/her personal information.

A client’s consent can be expressed, implied, or given through an authorized representative. A client can withdraw consent at any time, with certain exceptions. SSMEDC, however, may collect, use or disclose personal information without the client’s knowledge or consent in exceptional circumstances where such collection, use or disclosure is permitted or required by law.

## PRINCIPLE 4: LIMITING COLLECTION

The information collected from clients will be limited to those details necessary for the purposes SSMEDC has identified to them. Information will be collected by fair and lawful means.

## PRINCIPLE 5: LIMITING USE, DISCLOSURE AND RETENTION

Personal information will only be used or disclosed for the purpose for which it was collected, unless the customer has otherwise consented, or when it is required or permitted by law. Personal information may only be retained for the amount of time needed to fulfill the purpose for which it was collected.

## PRINCIPLE 6: ACCURACY

SSMEDC will keep personal information as accurate, complete and up-to-date as necessary, to fulfill the identified purposes for which it was collected. Where it is found to be inaccurate or incomplete, customers may have this information corrected.

## PRINCIPLE 7: SAFEGUARDING PERSONAL INFORMATION

Personal information is safeguarded using measures appropriate to the sensitivity of the information.

## PRINCIPLE 8: OPENNESS

SSMEDC will make information available to its clients about the policies and procedures it uses to manage personal information.

## PRINCIPLE 9: INDIVIDUAL AND EMPLOYEE ACCESS

Upon written request, a client will be informed of the existence, use and disclosure of his/her personal information, and will be given to it. Clients may verify the accuracy and completeness of his/her information and, if appropriate, may request that it be corrected.

SSMEDC will respond to such requests as efficiently as possible (within 3 working days after receipt of request).

## PRINCIPLE 10: PROVIDE RECOURSE

(Addressing Customer’s Complaints and Suggestions—Challenging PIPEDA Compliance)

Clients may direct any questions or enquiries with respect to the privacy principles outlined above, or about SSMEDC’s practices, by contacting SSMEDC’s Privacy Compliance Officer.

## Recourse—Questions, Concerns, Complaints:

If clients have any questions, concerns or complaints about our Privacy Policy, they may contact SSMEDC's Privacy Compliance Officer:

Manager, Corporate Services  
Sault Ste. Marie Economic Development Corporation  
Civic Centre, Level Three  
99 Foster Drive  
Sault Ste. Marie, Ontario P6A 5X6  
Phone: 705.759.5432  
Toll-free: 1.800.461.6020  
E-Mail: [info@ssmedc.ca](mailto:info@ssmedc.ca)

If a client has contacted SSMEDC's Privacy Compliance Officer, and is still not satisfied with the manner in which SSMEDC has dealt with his/her privacy concerns, he/she should contact an ombudsman—The Privacy Commissioner of Canada—at the Office of the Privacy Commissioner of Canada:

### **The Office of the Privacy Commissioner of Canada**

112 Kent Street  
Ottawa, Ontario K1A 1H3  
Phone: 613.995.8210  
Toll-Free: 1.800.947.6850  
Fax: 613.947.6850  
TTY: 613.992.9190  
Website: <http://privcom.gc.ca>  
E-Mail: [info@privcom.gc.ca](mailto:info@privcom.gc.ca)

**SAULT STE. MARIE ECONOMIC  
DEVELOPMENT CORPORATION**

Civic Centre, Level Three  
99 Foster Drive  
Sault Ste. Marie, Ontario P6A 5X6

Phone: 705.759.5432  
Fax: 705.759.2185  
Email: [info@ssmedc.ca](mailto:info@ssmedc.ca)

Open for Business

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