



London Training Centre (LTC) conforms to and follows the code for the protection of personal information included in Canada's Personal Information Protection and Electronic Documents Act, (PIPEDA) as Schedule 1.

The 10 principles established in the code are as follows:

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

The designated Privacy Official for London Training Centre Inc. is Cathy Neely, Office Administrator.

Privacy Code

This *Privacy Code* is the privacy policy of London Training Centre

COMMITMENT TO PRIVACY

Protecting your privacy and the confidentiality of your personal information has always been an important aspect of London Training Centre's operations. The collection and use of your personal information is fundamental to and essential for the provision of training services and Employment Ontario programs.

We treat your personal information fairly and with respect. Each LTC employee and clients must abide by our commitment to privacy in the handling of personal information.

Our *Privacy Code* informs you of our commitment to, and policy on, privacy. It tells you the ways LTC ensures that your privacy and the confidentiality of your personal information are protected.

WHAT IS PERSONAL INFORMATION?

Personal information is any piece of information, either factual or subjective, about an identifiable individual. Personal information does not include the name, title, business address, or telephone number of an employee of an organization.

London Training Centre's *Privacy Code* consists of the following ten key principles:

1. Accountability

LTC takes our commitment to securing your privacy very seriously. Each employee of the LTC and its associated entities is responsible for the personal information under his or her control. Our employees are informed about the importance of privacy and receive information periodically to update them about our *Privacy Code* and related policies.

In addition to establishing this *Privacy Code*, we have appointed Cathy Neely as the organization's Privacy Official. Cathy is responsible for analyzing all personal information handling practices and ensuring that our privacy policy is up-to-date and in force at all times.

2. Identifying Purposes: Why We Collect Information?

We ask you for information to establish a relationship and serve you as a client. We obtain most of our information about you directly from you. Whenever we collect information about you, we will explain how we intend to use it, either at that time or earlier. We will limit the information we collect to what we need for those purposes, and we will use it only for those purposes. We will obtain your consent if we wish to use your information for any other purpose.

3. Consent

We seek and confirm your consent to use your personal information at the time of collection or in advance. We will endeavor to employ clear, understandable language when we obtain your consent. Consent may be expressed in writing, and in some cases, you may provide it verbally or electronically. Written consent includes completing and signing a consent form. The choice to provide us with personal information is always yours. Upon request, we will explain your options of refusing.

In order to provide services and programs, LTC in accordance with signed agreements with funding organizations, must collect and report client information to comply with reporting requirements specific to those agreements. This collection and reporting will only be done with your signed consent.

From time to time, LTC may provide to government agencies statistical data that is drawn from the personal information provided by individuals (for example, information about numbers of clients, demographics or employment outcomes). In the provision of such statistical information, LTC will not provide any information that will permit the personal identification of individuals.

4. Limiting Collection

Information is not collected without a specific, limited requirement.
We collect information by fair and lawful means.

5. Limiting Use, Disclosure and Retention

The information we request from you is used for the purposes defined.
We will seek your consent before using the information for purposes beyond the scope of your original consent.

Under no circumstances do we sell client lists or other personal information to third parties. Our policy is to use and disclose personal information only to further communications necessary or appropriate to the fulfillment of our obligations and delivery of employment/training services to you.

6. Accuracy

All decisions involving personal information should be based on accurate and timely information. While we will do our best to base our decisions on accurate information, we rely on our clients to disclose all material information (i.e. Immigration status, work permits, letters of decision, program eligibility etc.) and to inform us of any relevant changes. We will make reasonable efforts to keep your information accurate and up-to-date, based upon satisfactory evidence provided by you and to the extent updated information is relevant to the purpose for which it was originally collected.

7. Safeguards: Protecting Your Information

We will protect your information with appropriate safeguards and security measures, such as our computer usage and security policies. All LTC computer workstations and our server containing electronic files are password protected with firewalls activated. Our computer systems, are password-secured and constructed in such a way that only authorized individuals can access secure systems and databases.

All hard copy files and client information are held in locked file drawers on site. We audit our procedures and security measures regularly to ensure that they are being properly administered and that they remain effective and appropriate.

Access to personal information will be authorized only for our employees, who require access in the performance of their duties, and to those otherwise authorized by law.

LTC may be required during audits to access personal information in order to fulfill its obligations to government.

When providing information to auditors or others, we will require such organizations or individuals to abide by our *Privacy Code*. We will give them only the information necessary to perform the services for which they are engaged, and will require that they not store, analyze or use that information for purposes other than to carry out those services.

If you send us an e-mail message that includes personal information (such as your name included in the "address"), we will use that information to respond to your inquiry. Please

remember that e-mail is not necessarily secure against interception. If your communication is very sensitive, you should not send it electronically.

8. Openness: Keeping You Informed

This *Privacy Code* is available to you in paper form. If you have any additional questions or concerns about privacy, we invite you to contact us by phone, fax, mail, e-mail, or our web site (www.londontraining.on.ca), and we will address your concerns to the best of our ability.

9. Providing Individual Access

We will give you access to the information we retain about you within a reasonable time, with a written request, satisfactory identification and proof of entitlement. You also have the right to know:

- how we collected your personal information;
- how we are using it; and
- to whom it may have been disclosed, except where such disclosure was to a governmental body for routine purposes.

10. Providing Recourse: Respecting and Responding to Your Privacy Concerns

We encourage you to contact us with any questions or concerns you might have about your privacy or our *Privacy Code*. We will investigate and respond to your concerns about any aspect of our handling of your information.

In most cases, an issue can be resolved simply. Tell us about your concerns and discussing it with us.

If, after contacting us, you feel that your concerns have not been addressed satisfactorily, please contact our Privacy Officer Cathy Neely. Please be sure to include your name, address, preferred method of communication, the nature of your complaint, and relevant details, including your past communications with us. If the issue is still not resolved satisfactorily, we will provide information on other complaint procedures that may be available to you.

Conclusions

Any changes to our *Privacy Code* and information handling practices shall be acknowledged in this *Privacy Code* in a timely manner. We may add, modify or remove portions of this Code when we feel it is appropriate to do so.