

# Strategic Communications Inc.

## Corporate Privacy Policy

### Overview

At Strategic Communications, respecting privacy is an important part of our commitment to our clients, their supporters, research respondents and the general public. You can be confident that any personal information that you share with us will stay with us.

Any time you participate as a respondent in one of our surveys, or give a donation to one of our clients, whether in person or by telephone, mail or Internet, you can be assured that your individual information will be kept confidential and never linked to your personal identifying information without your express permission. Your personal identifying information will never be sold to anyone. You are free to choose whether or not to support our client's work, participate in a survey, free to choose not to answer any specific questions and free to discontinue participation at any time.

The Strategic Communications Privacy Policy is a statement of principles and guidelines describing the level of protection of personal information provided by Strategic Communications to respondents and the general public. The objective of the Strategic Communications Privacy Policy is to promote responsible and transparent personal information management practices in a manner consistent with the provisions of the *Personal Information Protection and Electronic Documents Act (Canada)*.

Strategic Communications will continue to review its Privacy Policy to make sure that it is relevant and remains current with changing industry standards, technologies and laws.

If you have any concerns about how your privacy is protected at Strategic Communications, please contact our Privacy Officer by e-mail at [privacy@stratcom.ca](mailto:privacy@stratcom.ca), or by mail to:

**Privacy Officer**

1770 West 7th Ave, Suite 305  
Vancouver, BC  
V6J 4Y6

# The Detailed Strategic Communications Corporate Privacy Policy

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## Scope and Application

The ten principles that form the basis of The Strategic Communications Privacy Policy are interrelated and Strategic Communications shall adhere to the ten principles as a whole. Each principle must be read in conjunction with the accompanying commentary. As permitted by the *Personal Information Protection and Electronic Documents Act* (Canada), the commentary in The Strategic Communications Privacy Policy has been drafted to reflect personal information issues specific to Strategic Communications.

The scope and application of The Strategic Communications Privacy Policy are as follows:

- The Strategic Communications Privacy Policy applies to personal information collected, used, or disclosed by Strategic Communications in the course of commercial activities.
- The Strategic Communications Privacy Policy applies to the management of personal information in any form whether oral, electronic or written.
- The Strategic Communications Privacy Policy does not impose any limits on the collection, use or disclosure of the following information by Strategic Communications:
  - (a) non-personally identifiable information;
  - (b) the name, title, business address and/or telephone number of an employee of an organization;
  - (c) other information about an individual that is publicly available and is specified by regulation pursuant to the *Personal Information Protection and Electronic Documents Act* (Canada).
- The application of The Strategic Communications Privacy Policy is subject to the requirements and provisions of the *Personal Information Protection and Electronic Documents Act* (Canada), the regulations enacted thereunder, and any other applicable legislation or regulation.

## Definitions

**collection:** The act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

**consent:** Voluntary agreement for the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing, but is always unequivocal and does not require any inference on the part of Strategic Communications. Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

**disclosure:** Making personal information available to a third party.

**employee:** An employee of or independent contractor to Strategic Communications.

**personal information:** Information about an identifiable individual, but does not include the name, title, business address or telephone number of an employee of an organization, and does not include descriptive, factual information about an organization.

**Supporter or member:** a member of the public who provides personal information to Strategic Communications in the course of a fundraising, sales or advocacy call.

**respondent:** A member of the public who provides personal information to Strategic Communications in the course of a survey conducted by Strategic Communications. For example, a respondent is an individual who discloses personal information to Strategic Communications in the course of quantitative or qualitative marketing or social research.

**third party:** An individual or organization outside of Strategic Communications.

**use:** The treatment, handling, and management of personal information by and within Strategic Communications or by a third party with the knowledge and approval of Strategic Communications.

## The Ten Principles of Privacy

### Principle 1 – Accountability

*Strategic Communications is responsible for personal information under its control and shall designate one or more persons who are accountable for Strategic Communications compliance with the following principles.*

Responsibility for compliance with the provisions of the Strategic Communications Privacy Policy rests with the Strategic Communications Privacy Officer who can be reached by e-mail at dsmith@stratcom.ca or by mail at 1770 West 7th Ave, Suite 305, Vancouver BC V6J 4Y6. Other individuals within Strategic Communications may be delegated to act on behalf of the Privacy Officer or to take responsibility for the day-to-day collection and/or processing of personal information.

Strategic Communications is responsible for personal information in its possession or control and shall use contractual or other means to provide a comparable level of protection while information is being processed or used by a third party.

### Principle 2 – Identifying Purposes for Collection of Personal Information

*Strategic Communications shall identify the purposes for which personal information is collected at or before the time the information is collected.*

Strategic Communications collects personal information from the public only for the following purposes:

- (a) to conduct quantitative or qualitative marketing and social research;
- (b) to understand respondent opinions to establish suitability for further quantitative and qualitative marketing and social research;
- (c) for fundraising, sales, political or advocacy campaigns; and
- (d) to meet legal and regulatory requirements.

Further reference to “identified purposes” mean the purposes identified in this principle.

Strategic Communications shall specify orally, electronically or in writing the identified purposes to the individual being contacted at or before the time personal information is collected. Upon request, persons collecting personal information shall explain these identified purposes or refer the individual to a designated person within Strategic Communications who can explain the purposes.

When personal information that has been collected is to be used or disclosed for a purpose not previously identified, the new purpose shall be identified prior to use. Unless the new purpose is permitted or required by law, the consent of the individual will be acquired before the information will be used or disclosed for the new purpose.

Strategic Communications may provide clients or other third parties with information from any survey, in aggregate form. In aggregate form it is impossible to identify an individual’s personal information

### **Principle 3 – Obtaining Consent for Collection, Use or Disclosure of Personal Information**

*The knowledge and consent of an individual are required for the collection, use, or disclosure of personal information, except where inappropriate.*

Participation by individuals in survey research, focus groups, fundraising or communications campaigns is always voluntary. When an individual agrees to donate money, buy a product or service or participate in a survey or advocacy campaign, he/she gives consent to the collection of personal information by participating (through making a donation, participating in an interview, or signing a petition or action card).

Personal information collected is not disclosed to third parties except where it is appropriate for the project, for example the disclosure of member donation information to a client. Occasionally, a client sponsoring a research project may want to contact respondents directly. In these cases, Strategic Communications always explains the reason for the disclosure to the respondent and obtains express permission from the respondent before making any such disclosure.

Individuals are always free to choose whether or not to participate in fundraising calls, surveys etc. They are also free to choose not to answer any specific questions and free to discontinue participation at any time.

In obtaining consent, Strategic Communications shall use reasonable efforts to ensure that individuals are advised of the identified purposes for which personal information will be used or disclosed. The identified purposes shall be stated in a manner that can be reasonably understood by the individual.

Generally, Strategic Communications shall seek consent to use and disclose personal information at the same time it collects the information. However, Strategic Communications may seek consent to use and/or disclose personal information after it has been collected, but before it is used and/or disclosed for a new purpose.

In determining the appropriate form of consent, Strategic Communications shall take into account the sensitivity of the personal information and the reasonable expectations of its respondents.

The participation of a respondent in a quantitative or qualitative marketing or social research study, or a fundraising or advocacy campaign, may constitute implied consent for Strategic Communications to collect, use and disclose personal information for the identified purposes.

Strategic Communications acknowledges and agrees that all fundraising, sales, advocacy and research data are the property of the client commissioning the research project, and are confidential and shall be used for no other purpose without the explicit permission of the client.

All survey respondents and focus group participants are guaranteed anonymity by Strategic Communications. Survey results are provided to the client in aggregate, or in a format that does not identify full names or contact information of individual respondents.

### **Principle 4 – Limiting Collection of Personal Information**

*Strategic Communications shall limit the collection of personal information to that which is necessary for the purposes identified by Strategic Communications. Strategic Communications shall collect personal information by fair and lawful means.*

In conducting its business, Strategic Communications limits the amount and type of personal information it collects. We collect only the amount and type of information needed for the purposes identified to individuals.

Strategic Communications collects personal information about an individual primarily from that individual or a member of that individual's household. Except as permitted by law, Strategic Communications will only collect personal information from external sources, such as client organizations, if individuals have consented to such collection.

## **Principle 5 – Limiting Use, Disclosure, and Retention of Personal Information**

*Strategic Communications shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.*

Strategic Communications may disclose an individual's personal information to:

- (a) a client of Strategic Communications where the respondent has consented to such disclosure;
- (b) a third party engaged by Strategic Communications to perform functions on its behalf;
- (c) a public authority or agent of a public authority if, in the reasonable judgment of Strategic Communications, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information; or
- (d) a third party or parties, where the respondent consents to such disclosure or disclosure is required or permitted by law.

Only Strategic Communications's employees with a business need-to-know, or whose duties reasonably so require, are granted access to personal information about respondents, supporters or members.

Strategic Communications shall keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where a respondent, supporter or member may have to be re-contacted for purposes of clarifying responses to a survey, or to seek additional responses, Strategic Communications shall retain the personal information for a period of time that is reasonably sufficient to allow this re-contact.

Strategic Communications shall maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased or made anonymous.

## **Principle 6 – Accuracy of Personal Information**

*Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.*

Personal information used by Strategic Communications shall be sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about an individual.

Strategic Communications shall update personal information about respondents, members, supporters and employees as necessary to fulfill the identified purposes or upon notification by the individual.

## **Principle 7 – Security Safeguards**

*Strategic Communications shall protect personal information by security safeguards appropriate to the sensitivity of the information.*

Strategic Communications shall protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures, regardless of the format in which it is held.

Strategic Communications shall protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

All of Strategic Communications's employees with access to personal information shall be required to respect the confidentiality of that information.

## **Principle 8 – Openness Concerning Policies and Procedures**

*Strategic Communications shall make readily available to individuals specific information about its policies and procedures relating to the management of personal information.*

Strategic Communications shall make information about its policies and procedures easy to understand, including:

- (a) the title and address of the person or persons accountable for Strategic Communications's compliance with its Privacy Policy and to whom inquiries and/or complaints can be forwarded;
- (b) the means of gaining access to personal information held by Strategic Communications;
- (c) a description of the type of personal information held by Strategic Communications, including a general account of its use; and
- (d) a description of what personal information is made available to related organizations (e.g. subsidiaries).

## **Principle 9 – Individual Access to Personal Information**

*Upon request, Strategic Communications shall inform an individual of the existence, use, and disclosure of his or her personal information and shall give the individual access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.*

Upon written request to the Privacy Officer, Strategic Communications will inform an individual of the existence, use and disclosure of his/her personal information and shall be given access to that information.

In certain situations, Strategic Communications may not be able to provide access to all the personal information that it holds about a respondent, supporter or member. For example, Strategic

Communications may not provide access to information if doing so would likely reveal personal information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, Strategic Communications may not provide access to information if disclosure would reveal confidential commercial information.

In order to safeguard personal information, a respondent, supporter or member may be required to provide sufficient identification information to permit Strategic Communications to account for the existence, use and disclosure of personal information and to authorize access to the individual's file. Any such information shall be used only for this purpose.

Strategic Communications shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, Strategic Communications shall transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.

Respondents supporters, members and employees can obtain information or seek access to their individual files by contacting the Strategic Communications Privacy Officer.

## **Principle 10 – Challenging Compliance**

*An individual shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for Strategic Communications's compliance with the Strategic Communications Privacy Policy.*

Strategic Communications shall maintain procedures for addressing and responding to all inquiries or complaints from its respondents regarding Strategic Communications's handling of personal information.

Strategic Communications shall, on written request, inform its respondents about the existence of these procedures as well as the availability of complaint procedures.

The person or persons accountable for compliance with the Strategic Communications Privacy Policy may seek external advice where appropriate before providing a final response to individual complaints.

Strategic Communications shall investigate all complaints concerning compliance with its Privacy Policy. If a complaint is found to be justified, Strategic Communications shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. The complainant shall be informed of the outcome of the investigation regarding his or her complaint.

## **Additional Information**

For more information regarding the Strategic Communications Privacy Policy, please contact the Strategic Communications Privacy Officer by e-mail at [privacy@stratcom.ca](mailto:privacy@stratcom.ca), or by mail at

1770 West 7th Ave, Suite 305  
Vancouver, BC  
V6J 4Y6

Please visit the Privacy Commissioner of Canada's website at [www.privcom.gc.ca](http://www.privcom.gc.ca)