



Ten Principles of Fair Information Practices for Businesses

The Personal Information Protection and Electronic Documents Act (PIPEDA) reflects the realities of the business world. It's based on the Canadian Standards Association's Model Code for the Protection of Personal Information, which is incorporated into the legislation.

The 10 principles of fair information practices are summarized as follows:

1. **Accountability:** Appoint an individual (or individuals) to be responsible for your organization's compliance; protect all personal information held by your organization or transferred to third party for processing; and develop and implement personal information policies and practices.
2. **Identifying purposes:** Your organization must identify the reasons for collecting personal information before or at the time of collection. Before or when any personal information is collected, identify why it is needed and how it will be used; document why the information is collected; inform the individual from whom the information is collected why it is needed; identify any new purpose for the information and obtain the individual's consent before using it.
3. **Consent:** Inform the individual in a meaningful way of the purposes for the collection, use or disclosure of personal data; obtain the individual's consent before or at the time of collection, as well as when a new use is identified.
4. **Limiting collection:** Do not collect personal information indiscriminately; do not deceive or mislead individuals about the reasons for collecting personal information.
5. **Safeguards:** Protect personal information against loss or theft; safeguard the information from unauthorized access, disclosure, copying, use or modification; protect personal information regardless of the format in which it is held.

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as:

- age, name, ID numbers, income, ethnic origin, or blood type;
- opinions, evaluations, comments, social status, or disciplinary actions; and
- employee files, credit records, loan records, medical records, existence of a dispute between a consumer and a merchant, intentions (for example, to acquire goods or services, or change jobs).



Privacy

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6. **Limiting use, disclosure, and retention:** Use or disclose personal information only for the purpose for which it was collected, unless the individual consents, or the use or disclosure is authorized by the Act; keep personal information only as long as necessary to satisfy the purposes; put guidelines and procedures in place for retaining and destroying personal information; keep personal information used to make a decision about a person for a reasonable time period. This should allow the person to obtain the information after the decision and pursue redress; destroy, erase or render anonymous information that is no longer required for an identified purpose or a legal requirement.
7. **Accuracy:** Minimize the possibility of using incorrect information when making a decision about the individual or when disclosing information to third parties.
8. **Openness:** Inform your customers, clients and employees that you have policies and practices for the management of personal information; make these policies and practices understandable and easily available.
9. **Individual access:** When requested, inform individuals if you have any personal information about them; explain how it is or has been used and provide a list of any organizations to which it has been disclosed; give individuals access to their information; correct or amend any personal information if its accuracy and completeness is challenged and found to be deficient; provide a copy of the information requested, or reasons for not providing access, subject to exception set out in Section 9 of the Act; an organization should note any disagreement on the file and advise third parties where appropriate.
10. **Provide recourse:** Develop simple and easily accessible complaint procedures; inform complainants of avenues or recourse. These include your organization's own complaint procedures, those of industry associations, regulatory bodies and the Privacy Commissioner of Canada; investigate all complaints received; take appropriate measures to correct information handling practices and policies.