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## Privacy Policy

(February 19, 2020)

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### External Reference Material:

- **CUCommunity**  
<https://cucommunity.ca/Pages/default.aspx>
- **PIPEDA Legislation and related Regulations**  
[https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/p\\_principle/](https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/p_principle/)
- **Office of the Privacy Commissioner of Canada**  
<https://www.priv.gc.ca/en/>

### Internal Related forms:

- **Annual Declaration of Compliance with Rules of Conduct**
- **Conflict of Interest and Confidentiality Policy**

Reviewed: February 18, 2020  
Approved by the Board: March 4th, 2020  
Review Frequency Bi-Annual  
Next Review Date November 2020

## **Foreword**

Sunrise Credit Union Limited is a member-owned and controlled financial institution and, as such, has an inherent responsibility to be open and accessible while, at the same time, adhering to the highest standards for the protection of members' personal privacy.

## **Purpose and Scope**

The Board of Directors and the Management of Sunrise Credit Union are committed to ensuring the successful application of this policy in relation to the collection, usage, disclosure, and processing of personal data.

This policy defines Sunrise Credit Union Limited's Privacy Code, which provides guidelines that Sunrise Credit Union uses to protect the privacy of personally identifiable member and employee data that is collected, used, disclosed or communicated to Sunrise Credit Union in the course of its business.

This Code is based on the privacy protection principles laid out in the Canadian Standards Association (CSA) *Model Code for the Protection of Personal Information* and applies to all aspects of information handling within Sunrise Credit Union and informs the public of our commitment to member privacy.

In adopting this Code for the Protection of Personal Information, what has been accepted practice becomes a documented commitment to the member.

This document and its contents are also the guiding principles for all vendor contracts.

## **Appoint Privacy Officer**

Sunrise Credit Union Executive team will designate a Privacy Officer and his/her designate who is accountable for Sunrise Credit Union's compliance with the principles of this Code.

Sunrise Credit Union shall identify internally and to the system, the designated individual who is responsible for the organization's day-to-day compliance with the principles. However, this does not, in any way, relieve any other Sunrise Credit Union employee or Board Member from an obligation to comply with the law.

The Privacy Officer will source and develop information and training materials to ensure employees clearly understand their obligations to protect personal information and the procedures to be employed under the Sunrise Credit Union Privacy Code.

## **Annual Review of Privacy Code**

On a minimum of an annual basis, the Privacy Officer will monitor the Privacy Code for any amendments requiring policy, procedure and/or additional training updates. He/she will present these legislative changes to senior management at the time of discovery and to the Board of Directors at the next scheduled board meeting.

Reviewed: February 18, 2020

Approved by the Board: March 4th, 2020

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## **Board Member and Employee Responsibilities**

All board members and employees are responsible for maintaining the confidentiality of all personal information to which they have access.

All board members and employees are required to successfully complete the annual online Privacy course offered by CUSource in addition to regular communications and training provided by the credit union. The completion of said training is tracked and recorded to ensure compliance.

All board members are required to annually sign the “Conflict of Interest and Confidentiality Policy” as a condition of their term, which, among other practices, confirms board member’s commitment to the safeguarding of all confidential information.

All employees are required to annually sign a “Rules of Conduct” agreement as a condition of employment, which, among other practices, confirms employee’s commitment to the safeguarding of all confidential information.

## **Breach Notification and Reporting**

- **Risk evaluation**

The Privacy Officer or the designate will assess all breaches to determine if the breach is a real risk of significant harm. If the breach is deemed a Real Risk of Significant Harm, the breach will be reported immediately to the Privacy Commissioner.

- **Reports to Commissioner**

The Privacy Officer will report to the Privacy Commissioner any breach of security safeguards that results in a real risk of significant harm.

- **Notification to Individuals**

The Privacy Officer or designate will notify affected individuals of any breach of security safeguards that result in a real risk of significant harm.

- **Notification to Other Organizations**

The Privacy Officer will notify any other organization or government institutions of the breach in order to reduce the risk of significant harm.

Where escalation to the Privacy Commissioner or other government institutions is required, the Privacy Officer will continue to brief the Executive team and the President and CEO will liaise with the Board Chair.

**Sunrise Credit Union Limited will keep a record of all breaches and retain these records for a minimum of 2 years.**

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## **External Audits**

Every two years, at minimum, the credit union will contract an external service provider to test and report on the effectiveness of the Privacy Code as implemented at Sunrise Credit Union. The results will be provided to the Board along with the Privacy Officers response within thirty (30) days of receipt of the report.

## **Board Reporting**

The Privacy Officer will report to the Board annually on the disposition of all inquiries to Sunrise Credit Union from their members, the public, other organizations, and government agencies. Any significant breaches will be reported immediately to the President and CEO who will act as the liaison with the Board of Directors within the reporting period.

## **Policy Statement**

Sunrise Credit Union takes compliance with all aspects of Privacy very seriously. Sunrise Credit Union Limited is committed to keeping members' personal information accurate, confidential, secure and private. Sunrise Credit Union's goal is to protect the right to privacy for our members, our contacts and our credit union

This policy sets forth the protective measures necessary to fully incorporate privacy practices into all information handling activities, and to foster the necessary levels of board member and employee awareness and engagement.

Sunrise Credit Union Limited will publish this Privacy Policy both internally and externally to show its commitment to compliance with the federal legislation.

**Sunrise Credit Union Limited's Board of Directors understands that failure to comply with the Privacy Code can lead to criminal charges against the credit union.**