

PRIVACY POLICY

Anishinabek Employment and Training Services (“AETS”)

(Last Updated on April 19, 2024)

Introduction

Protecting your privacy and the confidentiality of your information -- over the Internet, on the telephone, or through our offices – has always been fundamental to the way we do business at AETS. We operate on the basis of a Privacy Policy and related procedures that guide the handling of the personal information we collect. We have created this privacy statement in order to demonstrate our firm commitment to protecting the privacy of our members, partners and potential Web site visitors. This policy and related procedures are consistent with the Canadian Standards Association Model Code for the Protection of Personal Information (herein “CSA Model Code”) and applicable privacy legislation.

Privacy Statement

This policy deals only with personal information handled by AETS. Personal information is information about an identifiable individual, excluding business contact information. The following explains how AETS handles personal information. AETS reserves the right to change this policy and it may be updated periodically. These changes may affect our use of your personal information. Accordingly, please check for changes regularly.

Accountability

AETS is accountable for all personal information under its control. AETS’s privacy officer is the Operations Manager, Kathleen Maletta, who is designated as responsible for AETS’s privacy policy. The privacy officer can be reached by:

- e-mail kathleen.maletta@aets.org
- telephone, at (807) 346-0307 ext. 203
- fax, at (807) 346-0310
- mail, at 285 Red River Road, Thunder Bay, ON P7B 1A9

Any questions about AETS’s handling of personal information should be directed to the privacy officer. Please see below for more information about the process for referring questions about AETS’s handling of personal information.

Purposes for Collection, Use and Disclosure of Personal Information

The purpose for which AETS collects personal information will be identified at or before the time the information is collected. AETS may collect personal information for the purposes of:

- administering AETS programs and providing related services;
- developing and improving AETS programs and services;
- determining eligibility for third party programs or services; and
- processing and administering the above or other purposes as necessary.

AETS will not use personal information for any other purpose than identified at or before the time of collection.

Consent

AETS seeks consent for all personal information we collect, use and disclose through information provided to individuals prior to collection, or at the time of collection.

If you have voluntarily provided information, you have consented to the collection, use and disclosure of your personally identifiable information as described in this privacy policy. As required by the CSA Model Code, AETS will not use personal information for any purpose other than that for which you consented. Should AETS require personal information for a new purpose, we will contact you to seek consent for that new use.

Limits for Collecting, Using, Disclosing and Keeping Personal Information

AETS does not collect, use or disclose personal information of individuals except when individuals give consent and provide the information on a voluntary basis. There may be occasions where more specific personal information is necessary for us to proceed with a request for information or provide you with a product or service. In such cases, we will provide you with a description of the information we need. In all cases, AETS limits the amount and type of information collected to only the personal information that is required to provide the individual with the requested information, product, or service. We collect only information that is voluntarily provided by you and undertake that such information will be kept strictly confidential.

We retain personal information only as long as is necessary to provide the individual with the requested product, service or information and delete or destroy this information after that time. In some cases, however, legal reporting and retention requirements necessitate that AETS retain information for a specific amount of time. In general, AETS retains information for a period no longer than seven years.

AETS does not sell or trade any personal information with third parties. AETS may transfer information to service providers where information processing is outsourced by AETS in the course of its administrative procedures in specific cases. Where personal information is transferred to a service provider for processing, we require the service provider to respect this Privacy Policy and we

restrict them from using or disclosing personal information transferred to them for any purpose other than the provision of services to us.

Any personal information that AETS retains is kept in such a manner as to ensure its security and confidentiality at all times.

Safeguarding Personal Information

AETS respects the privacy of our members, partners, potential website visitors and Internet users and will protect that privacy as vigorously as possible. We store personal information in electronic and physical files that are secure. Our security measures include secure locks on filing cabinets, and using industry standard techniques such as firewalls, and restricted access to records and to equipment, including computers. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot ensure or warrant the security of any information you transmit to us or receive from us electronically. This is especially true for information you transmit to us via e-mail. We have no way of protecting that information until it reaches us. Once we receive your transmission, we make our best efforts to ensure its security on our servers. Internally, access to personal information is restricted to employees who need access to the information in order to do their jobs. These employees are limited in number and are knowledgeable about and committed to our privacy policies.

Accuracy of and Access to Personal Information Collected

AETS makes every effort to keep personal information as accurate, complete, current and relevant as necessary for the identified purposes. AETS does not routinely update personal information.

AETS makes readily available to individuals our Privacy Policy and related procedures for managing personal information. We provide access to the Privacy Policy and related procedures to individuals in written form, upon request or through our website at <https://www.aets.org>. Any questions about the handling of personal information by AETS can be raised with our privacy officer.

At the written request of an individual, he or she may view or edit their personal information as collected by AETS. AETS will inform them of what personal information we have about the individual, what it is being used for and, in cases where it has been disclosed, to whom it has been disclosed. There may be exceptional circumstances as provided by the CSA Model Code under which AETS may not be able to give an individual access to the personal information about her or him held by AETS. In this case AETS will explain the reason for this lack of access, as provided by the CSA Model Code.

To make a request, please send a letter, email or fax addressed to our Privacy Officer at the address indicated above". In your request, please include the

following information: name; contact details; and the nature of your request; including whether you wish to view and/or edit information or inquire regarding use and/or disclosure.

AETS will reply to your request in no later than thirty days after receipt of the request, or if we are not able to respond within this time period, we will send you a notice of extension. If we are not able to disclose all the personal information we hold on you, we will give you a reason for our inability to do so, unless prohibited by law.

Questions

Any questions or comments about AETS's handling of personal information should be directed to our privacy officer.