



CPAC
Access/Correction
Guide
May 2020

Note

This document consists of an *Access/Correction* policy as well as guidance for individuals seeking access or correction to Personal Information that has been collected by and is under the control of the Partnership. This document is intended to be “external-facing”. This document supplements CPAC’s Privacy Statement.

Canadian Partnership Against Cancer Access Request/Correction Guide

In the course of its business activities and your relationship with the Canadian Partnership Against Cancer (“CPAC”, “the Partnership”, “us” or “we”), may collect and hold personal information about you (“Personal Information”). Examples of such information would be contact information, information collected as a result of a patient advisor volunteer application, or any information collected in the event you contact us for employment opportunities or inquiries. This guide is to be read in conjunction with CPAC’s Online Privacy Statement.

Please note this Guide applies only to requests for access or correction to Personal Information. Any other inquiries or concerns related to how the Partnership handles your Personal Information should be directed to the Partnership’s Chief Privacy and Security Officer (“CPSO”).

Our Policy on Accessing or Correcting Personal Information

Where Personal Information is in the custody or control of the Partnership, we provide a right of access and correction and will endeavour to provide the Personal Information in question within a reasonable time, generally within 30 days of the date your request is received.

Depending on the nature of the request, it may be necessary to extend our response time if, for example, meeting that deadline would unreasonably interfere with the Partnership’s business activities or if we need to consult with service providers or third parties. In the event an extension is needed, the Partnership will endeavour not to take longer than a further 60 days to provide a response.

The CPSO is responsible for responding to requests for access or correction of Personal Information. The Partnership’s policy is to respond promptly and efficiently to such requests and all our staff and service providers are required to assist the CPSO in processing any request to access or correct Personal Information.

Generally, the Partnership will not charge a fee for any access request but reserves the right to do so. For example, we may also charge a reasonable fee to comply with requests for further copies of the same information. If there are charges to provide you with the specific information that you have requested, we will advise you of the charges and obtain your authorization before proceeding.

This right of access is provided to the person whom the Personal Information is about or an authorized representative. You may be asked for identification so that we may verify your

identity before providing you with your Personal Information. In the case of authorized representatives, the Partnership may also require further information to allow us to confirm that the person making the request is authorized to do so before granting access or considering corrections.

If you require documents in an alternative format, we will make reasonable efforts to provide you with your Personal Information in that format.

The Partnership reserves the right not to change any Personal Information in our custody but may append any alternative text you believe to be appropriate.

We may decline access to, or correction of, Personal Information in certain circumstances. This occurs generally if applicable law allows or requires us to do so and is determined on a case-by-case basis. Where permitted to do so, the Partnership will provide to you our reasons for any decision to not provide access or make any correction.

The Partnership may refuse to address access or correction requests where they are unfounded, excessive or repetitive.

The CPSO will document all requests, extensions, accesses and refusals to access or correction of records of Personal Information.

How to Access Your Personal Information

The greater the degree of specificity in your request, the easier it is for the Partnership to respond. Please note that the Partnership may contact you to clarify your request.

In providing any information in a request to access or correct Personal Information you agree and consent that the Partnership may use this information only for the purposes of responding to your request.

Who You Are

We need to know who you are in order to respond. Accordingly, in contacting the Partnership, please provide:

- Your Name.
- Your contact phone number and/or email address.
- Your mailing address.
- If you are seeking access to information about another person, information to confirm your authority to make the request. This may occur in the case of a legal representative, a

guardian or a person holding a Power of Attorney.

Where to Send Your Request

You may address your request in writing (including by email) or verbally to the Partnership's CPSO, who is responsible for responding to your request:

By e-mail

info@partnershipagainstcancer.ca

By mail

Chief Privacy and Security Officer
Canadian Partnership Against Cancer
145 King Street West, Suite 900
Toronto, ON M5H 1J8
Tel: (416) 915-9222

Please note that if you send a request by email, you will be contacted by telephone to confirm that you did submit the request.

Providing the Details of Your Request

To ensure we provide the information you really want, please be as specific as possible. For example, if you want information collected between certain dates, this will permit us to respond more quickly than a general request for "all information".

What CPAC Will Do

Upon receipt of a request, the CPSO will examine the request to determine the scope and complexity and then verify, using Partnership records, that the contact information is correct and that the individual is authorized to make the request. If a request was made by email, the CPSO will contact the individual to confirm the request.

If the contact information provided does not match our records, we may ask you to confirm information about you that we hold in order to verify your identity and subsequently update our records.

The CPSO will then:

- Contact the appropriate CPAC personnel to find the information requested or

- determine the number and form (e.g. paper, electronic) of all relevant records that hold your Personal Information.
- Determine whether it is appropriate to charge a fee.
 - Estimate the fee (if any) and advise you of the amount of the fee before any processing will occur.
 - Obtain copies of relevant records and/or information.
 - Determine whether there is a need to consult with third parties or legal counsel and advise you as to whether a time extension is required as a result of these further consultations.
 - If access cannot be completed within 30 days, advise you of the estimated timeframe for completion of your request.
 - Review the information and/or records to conduct a line-by-line review and determine if any information needs to be redacted.
 - As a result of this information/record review and any consultations, make a determination as to the release or correction or refusal to release or correct information or records.
 - Consult with the Partnership's external counsel in the event of any question as to whether a record or information should be released or corrected.
 - Document the decision to accept, reject or change the determination.
 - Prepare the information and/or records (if any) for disclosure to you.
 - Collect the required fees, if any.
 - Transmit the Partnership's response to your access or correction request to you together, if applicable with the information and/or records requested.

What You Can Do If You Are Not Satisfied With CPAC's Response

If you are not satisfied with the Partnership's response to your request, please let us know. You may contact the Partnership's CPSO to further elaborate on your concerns, and ensure we fully address your concerns. If we are still unable to resolve the matter to your satisfaction, and to the extent that the Partnership may be engaged in a commercial activity, you may subsequently bring it to the attention Office of the Privacy Commissioner of Canada. The Partnership's CPSO will provide you with the appropriate contact information if it has been determined by the Privacy Officer that CPAC has been engaged in a commercial activity.

Changes to This Guide

We may modify or amend this Guide from time to time. When we make changes to this Guide, the Partnership will indicate the date of last update. The new modified or amended Guide will apply from that revision date and we encourage you to periodically review this Guide for the latest information.

Date of Last Update: May 2020