

POL012

Personal Information Protection

The printed copy of this document may be superseded without notice.
Please refer to the on-line electronic version on the Canadian Blood Services Intranet for the most current version.

Purpose

The purpose of this policy is to govern the collection, use, retention and disclosure of personal information and personal health information (collectively referred to as personal information) by Canadian Blood Services.

Policy

Canadian Blood Services shall:

- Collect, use, retain and disclose personal information in accordance with legal obligations and good privacy practices.
- Identify the purposes for which personal information is collected at or before the time the information is collected, unless otherwise authorized by applicable laws.
- Obtain the consent of the individual about whom personal information is collected, or someone authorized to provide consent on behalf of the individual. Consent may be express, implied, or deemed, depending on the circumstances.
- In some instances, indirectly collect personal health information about an individual who donates, or attempts to donate blood, plasma, stem cells, organs or tissues, if the information is reasonably necessary to ensure the safety of the blood system and it is not reasonably possible to collect directly from the individual.
- Cease continued use of personal information in some circumstances where an individual's consent is withdrawn.
- Limit the collection of personal information to that which is required to fulfill the identified purposes.
- Limit the use, retention and disclosure of personal information to the identified purposes, as outlined in Canadian Blood Services' Privacy Notices, or as authorized by law, except where consent has been provided.
- Retain personal information in accordance with approved records retention schedules and legislated requirements.
- Employ reasonable measures to ensure the personal information collected, used, retained or disclosed is accurate and complete.
- Protect personal information by employing security safeguards appropriate to the sensitivity of the information.

Access to Personal Information

Canadian Blood Services respects individuals' right of access to their personal information and shall:

- Respond to requests for personal information within 30 business days after a sufficiently detailed request is received. Responses shall state that:
 - The information requested can be released; or
 - Part or all of the request has been denied, with a reasonable explanation for the denial; or
 - The information, or part of it, is not in the custody or under the control of Canadian Blood Services.
- Extend the time for response for up to 30 business days by providing notice to the applicant if a large number of records is requested or must be searched, or meeting the time line would interfere with the operations of Canadian Blood Services.

Policy Scope

This policy applies to any business area of Canadian Blood Services that maintains custody or control of personal information, including personal health information. This policy does not apply to Canadian Blood Services employee personal information.

Roles and Responsibilities

The **Chief Privacy Officer** is responsible for developing, implementing and maintaining operational policies, processes and practices to give effect to this policy; and for ensuring practices are in place to address concerns or complaints regarding Canadian Blood Services' collection, use, retention or disclosure of personal information.

Management is responsible for ensuring that appropriate physical, technical and administrative controls are in place for safeguarding personal information in their business areas; for promoting privacy awareness; reporting privacy-related concerns and issues to the Privacy & Access to Information Office; and for ensuring that all new employees receive privacy and access to information training.

All Employees are responsible for adhering to policies and procedures for the collection, use, retention and disclosure of personal information; for reporting privacy-related concerns and issues to the Privacy & Access to Information Office; and for accessing and using only the personal information required to perform their job functions.

Compliance

Failure to comply with this policy, including the unauthorized access, use, disclosure, modification or destruction of personal information may result in disciplinary action, up to and including termination of employment, as determined by Canadian Blood Services.

Definitions

Personal information is information that identifies an individual, or could be used, either alone or with other information, to identify or describe a particular person.

Personal Information does **not** include work contact information for an employee such as an employee's name, position title, business telephone number, business address, business e-mail or business fax number.



Personal health information is identifying information about an individual, whether living or deceased, including:

- a) the physical or mental health of the individual, family history or health care history, including genetic information about the individual,
- b) the provision of health care to the individual, including the identification of a person as a provider of health care to the individual,
- c) the donation by the individual of any body part or bodily substance of the individual or is derived from the testing or examination of any such body part or bodily substance,
- d) the individual's provincial health number,
- e) an identifying number, symbol or particular assigned to an individual that may be used in conjunction with other information to identify the individual, or
- f) an individual's substitute decision-maker.

References

POL013 Employee Personal Information Protection
POL064 Privacy Breach Management
002 Information Classification Standard
Access to Information (ATI) Guidelines for Employees

Approval

Approved By: 

Approver Name and Title: Judie Leach Bennett, Vice-President, General Counsel & Corporate Secretary

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