



Data Privacy Policy

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Version: 1

Approved by the Board on: March 17, 2025

Responsible Person: Director, Operations

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Commitment Statement

The NCIME is committed to protecting the privacy and security of personal information. This Data Privacy Policy outlines our practices for collecting, using, disclosing, retaining, and disposing of personal information in compliance with applicable privacy legislation.

Scope

This policy applies to all NCIME employees, contractors, volunteers, and third-party service providers who handle personal information on behalf of NCIME.

Definitions

- **Personal Information:** Information about an identifiable individual, including but not limited to name, contact details, identification numbers, and any other data that can be used to identify a person.
- **Privacy Officer:** The designated individual responsible for overseeing the implementation and maintenance of this policy and ensuring compliance with applicable privacy laws.
- **Consent:** Voluntary agreement by an individual to the collection, use, or disclosure of their personal information.
- **De-identified Information:** Information from which personal identifiers have been removed so that the individual cannot be readily identified.
- **Aggregate Data:** Data that is compiled and summarized in a way that does not identify individuals.

Governance and Accountability

- **Privacy Officer:** NCIME CEO will appoint a Privacy Officer responsible for overseeing the implementation and maintenance of this policy, ensuring compliance with applicable laws, and addressing privacy-related inquiries and complaints.



- **Roles and Responsibilities:** All employees and agents are responsible for protecting personal information and complying with this policy.

Legal Framework

NCIME adheres to the Indigenous Data Sovereignty principles and Personal Information Protection and Electronic Documents Act (PIPEDA) and other relevant privacy legislation. We follow the ten fair information principles established by the Canadian Standards Association (CSA) Model Code for the Protection of Personal Information.

Collection of Personal Information

- **Purpose:** Personal information will be collected only for purposes that are clearly communicated to individuals at the time of collection.
- **Consent:** NCIME will obtain informed consent from individuals before collecting, using, or disclosing their personal information.
- **Limitation:** Only the minimum amount of personal information necessary to achieve the identified purpose will be collected.

Use and Disclosure of Personal Information

- **Use:** Personal information will be used only for the purposes for which it was collected, unless additional consent is obtained.
- **Disclosure:** Personal information will not be disclosed to third parties without the individual's consent, except as required by law.

Retention and Disposal

- **Retention:** Personal information will be retained only as long as necessary to fulfill the identified purposes or as required by law.
- **Disposal:** Personal information will be securely disposed of when no longer needed, using methods such as shredding paper records and securely deleting electronic records.

Safeguards

NCIME will implement administrative, physical, and technical safeguards to protect personal information against loss, theft, unauthorized access, disclosure, copying, use, or modification.

Access and Correction



- **Access:** Individuals have the right to access their personal information held by NCIME and to request corrections if the information is inaccurate or incomplete.
- **Correction:** NCIME will correct or update personal information upon request and notify any third parties to whom the information was disclosed.

Privacy Impact Assessments

NCIME will conduct privacy impact assessments for new or significantly modified programs, systems, or processes that involve the collection, use, or disclosure of personal information.

Training and Awareness

NCIME will provide regular privacy training and awareness programs to all employees and agents to ensure they understand their responsibilities under this policy.

Breach Response

In the event of a privacy breach, NCIME will take immediate steps to contain the breach, assess the risks, notify affected individuals and relevant authorities, and implement measures to prevent future breaches.

Complaints and Inquiries

Individuals can direct privacy-related inquiries or complaints to the NCIME Privacy Officer. Complaints will be investigated promptly, and appropriate measures will be taken to resolve any issues.

Review and Updates

This policy will be reviewed annually and updated as necessary to ensure continued compliance with applicable privacy legislation and best practices.

References

- Personal Information Protection and Electronic Documents Act (PIPEDA)
- Canadian Standards Association (CSA) Model Code for the Protection of Personal Information
- Office of the Privacy Commissioner of Canada (OPC) guidelines and best practices

Keywords

- Data Privacy
- Personal Information
- Consent



- Privacy Officer
- De-identified Information
- Aggregate Data
- Safeguards
- Privacy Impact Assessment
- Breach Response