

Film Nova Scotia Privacy Policy

Approval Date: March 27, 2009

Effective Date: March 31, 2009

Approved By: Ann MacKenzie, President & CEO

I POLICY STATEMENT

It is the policy of Film Nova Scotia that it will ensure adherence to the privacy protection provisions of the Freedom of Information and Protection of Privacy Act, the Personal Information International Disclosure Protection Act, the Government Privacy Policy and other applicable legislation. Film Nova Scotia will uphold the principles of transparency, custodianship and shared responsibility established in the Government Privacy Policy, as it relates to the collection, use and disclosure of personal information.

II DEFINITIONS

For the purposes of this policy, the following definitions shall apply.

Administrator The officer responsible for receiving and responding to applications made to Film Nova Scotia under the FOIPOP Act

employee an individual in the employ of, seconded to, or under personal service contract to the Government entity and their volunteers, students, and interns who have access to records.

FOIPOP *NS Freedom of Information and Protection of Privacy Act*

personal information as defined in clause 3(1)(I) of the FOIPOP Act, "recorded information about an identifiable individual, including:
(I) the individual's name, address or telephone number,
(ii) the individual's race, national or ethnic origin, colour, or religious or political beliefs or associations,
(iii) the individual's age, sex, sexual orientation, marital status or family status,
(iv) an identifying number, symbol or other particular assigned to the individual,

- (v) the individual's fingerprints, blood type or inheritable characteristics,
- (vi) information about the individual's health-care history, including a physical or mental disability,
- (vii) information about the individual's educational, financial, criminal or employment history,
- (viii) anyone else's opinions about the individual, and
- (ix) the individual's personal views or opinions, except if they are about someone else”

privacy breach the event of unauthorized collection, access, use, disclosure, or alteration of personal information

PIA a Privacy Impact Assessment is a due diligence exercise which identifies and addresses potential privacy risks that may occur in the course of the operations of a public body

record as defined in clause 3(1)(k) of the FOIPOP Act, includes books, documents, maps, drawings, photographs, letters, vouchers, papers and any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means, but does not include a computer program or any other mechanism that produces records

III POLICY OBJECTIVES

The policy is designed to ensure that government meets its legislated obligations in the management of personal information throughout its life cycle. This includes ensuring the protection of personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

IV APPLICATION

This policy applies to:

- all employees
- all personal information in the custody and control of Film Nova Scotia

V POLICY DIRECTIVES

- Film Nova Scotia shall only collect, access, store, use, disclose and dispose of personal information where authorized by law, regulation, or authorized policy.

- The President and CEO of Film Nova Scotia shall identify those individuals with designated or delegated responsibilities for making reasonable security arrangements for personal information in keeping with the provisions of applicable legislation.
- Film Nova Scotia shall have a privacy breach protocol, per the template maintained by the NS Information Access and Privacy Office (located at the Department of Justice).
- Film Nova Scotia shall complete a privacy impact assessment for any new program or service or for a significant change to a program or service, as per the template maintained by the NS Information Access and Privacy Office (located at the Department of Justice).
- All employees shall be advised of the policy coming into force.
- This policy shall be made readily available and will be posted on the Film Nova Scotia Internet Website.
- Requests for correction of personal information or to express concern regarding compliance shall be directed to the Administrator.

VI POLICY GUIDELINES

Personal information will be secured and access will be controlled by adhering to the following:

- Filing cabinets are locked; access is limited to individuals who need access only for the purpose of carrying out a program or service;
- Databases containing personal information are password protected; and passwords will only be issued to staff that require access to deliver the program or service;
- Files containing personal information are not removed from offices or left unattended, and disposal of both transitory or master records containing personal information will only be carried out using secure methods, such as shredding;
- Access to the server, e-mail accounts, and electronic devices are password protected;
- Contracts with external service providers shall contain privacy provisions;
- Training and awareness will be provided to all staff on the privacy protection of personal information. Film Nova Scotia shall ensure that all new employees receive a copy of this policy in an orientation package;
- The Administrator will coordinate responses to privacy policy request regarding Film Nova Scotia and in compliance with the Privacy Policy;
- Concerns about compliance with the privacy policy shall be made in writing;
- Staff who receive privacy concerns or complaints must forward them without delay to the Administrator for response;
- Best efforts will be applied to respond to privacy concerns or complaints within 30 days of receipt of the written application/request by the office of the Administrator.

VII ACCOUNTABILITY & SECURITY

1. The President and CEO shall be accountable for compliance with this policy.
2. Each employee is responsible for complying with this policy and the privacy policies of Film Nova Scotia and the Government of Nova Scotia.

VIII MONITORING

1. Compliance with the policy directives will be monitored on an ongoing basis by the Administrator.
2. The policy will be formally evaluated and reviewed on an annual basis by the Board of Directors and the President and CEO.

IX REFERENCES

- Freedom of Information & Protection of Privacy Act and Regulations
- Personal Information International Disclosure Protection Act
- Government Records Act
- Management Manual 300: Common Services, Chapter 4, Policy 4.7, Website Privacy Policy
- Management Manual 100: Management Guide, Chapter 1, Policy 1.2 Management Manuals Policy
- Privacy Impact Assessment for Film Nova Scotia
- Privacy Breach Protocol for Film Nova Scotia

X ENQUIRIES

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