

[Company Name]
Privacy and Confidentiality Policy

Approval Date	Effective Date	Last Review Date
Pending	Pending	April

Policy Number:	
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Approved by:	xx Executive Board
Responsibility:	xx Executive Board
Applies to:	xx Employees, xx Executive Board, xx Members

1. PURPOSE

- a. The purpose of this policy is to provide guidelines on the practices and standards regarding the collection, use, and disclosure of personal information in the course of activities carried out at [Company Name].
- b. This policy intends to guide xx personnel and third who have been given access to personal information in xx’s possession. [Company] requires that every personnel or third party who collects, uses, or discloses personal information on behalf of the company to comply with the provisions of this policy regarding the performed work.

2. APPLICATION OF THE POLICY

- a. This policy applies to xx employees, Executive Board Members, and xx members.

3. DEFINITIONS

- a. xx Employees
 - i. Persons hired or appointed by the Business Manager or Authorized Designate to perform work related explicitly to servicing the membership and who receive remuneration in the form of a payroll check from the Local Union.
- b. Executive Board Members

- i. Persons elected by the membership or otherwise appointed to the Executive Board as may be permitted by the IUOE Constitution or By-Laws of the Local Union.
- b. xx Members
 - i. Persons associated with xx in various capacities, mainly through membership, in many cases through agencies or individual level. [Company] is mandated by virtue of its core values to defend and promote social justice for its members.
- c. Personal information
 - i. Any information about an identifiable person that does not entail information that cannot be tracked back to a given person.
- d. Privacy
 - i. The right to be let alone, or freedom from intrusion or interference. Being free from being disturbed or observed by others.
- e. Privacy policy
 - i. A legal document or a statement that discloses approaches used by a company to gather, use, disclose, and manage data collected. It documents the manner in which employers monitor and collect information on the communication, activities, and private lives of employees.
- f. Confidentiality
 - i. Obligations of individuals and institutions to use information disclosed to them and under appropriate control. Preserving authorized restrictions on access and disclosure.
- g. Confidentiality policy
 - i. Measures a company use to protect its valuable information. Set of rules guiding the restrictions on the use of various types of information.

4. PRIVACY AND CONFIDENTIALITY PRINCIPLES

- a. Accountability
 - i. [Company] is obliged to protect the personal information under its control. To be accountable for this, xx receives and works on inquiries and complaints from persons about their personal data. [Company] explains the Privacy and Confidentiality Policy to its personnel and members to avoid a breach of the policy and practices and take necessary actions if a violation occurs.
- b. Identification of reasons

- i. [Company] identifies the reason(s) for collecting personal information, which is communicated before or during the collection period. The collected information is to be used for the said reason(s), and if there is a need to use it for other reason(s), the person is notified to obtain their consent.
 - c. Consent
 - i. [Company] obtains the consent of persons before collecting, using, or disclosing personal information.
 - ci. Limitations
 - i. [Company] limits the collection of personal information to suit only the reason(s) required and specified by xx. [Company] collects information lawfully and does not harass persons during the process.
 - cii. Usage, disclosure, and retention
 - i. Solely, personal information will neither be disclosed nor used for reason(s) not intended to, unless another reason(s) is required and the client gives the go-ahead. Retaining personal information is done if it's required to fill in the reason(s).
 - ciii. Third parties
 - i. [Company] may use third parties to conduct operations on its behalf. The third parties can store, process, and transfer information on their servers; thus, the information is at risk for request. [Company] ensures and guarantees the protection of the information.
 - civ. Compliance inquiries and reports
 - i. Any individual who wants to make inquiries or report violations of the xx's compliance with its Privacy and Confidentiality Policy can do so to the Business Manager or Authorized Designate, and investigations on the inquiries and issues raised will be done, and actions are taken based on the findings.
 - cv. Monitoring and compliance
 - i. The xx Executive Board will lead the monitoring and compliance of this Privacy and Confidentiality Policy. xx Executive Board, Employees, and Members will acknowledge compliance with this Privacy and Confidentiality Policy annually.

SIGN-OFF ([Company]– Privacy and Confidentiality Policy)

Employee / Executive Board Member
(Please Print)

Employee / Executive Board Member
(Signature)

Witness

Date