



<b>Policy Title:</b> CONFIDENTIALITY, PRIVACY, AND DATA PROTECTION		<b>Policy Section: I</b> General Policies	<b>Policy Number:</b> I-07
<b>Approved By:</b> CAMLPR Board of Directors	<b>Date Approved:</b> Oct 30, 2024	<b>Date Reviewed/ Revised:</b> June 17, 2025	<b>Executive Director's Signature:</b>  Adam Chrobak

## 1.0 PURPOSE

The purpose of this policy is to ensure the confidentiality, privacy, and protection of personal information collected and managed by CAMLPR. CAMLPR is committed to maintaining the highest standards of privacy and data security in compliance with applicable data protection laws and regulations.

## 2.0 POLICY STATEMENT

CAMLPR is dedicated to complying with all relevant data protection laws and regulations while safeguarding the privacy and security of personal data throughout the collection, processing, and retention stages.

## 3.0 SCOPE

This policy applies to all personal information collected, processed, stored, and managed by CAMLPR. It governs the practices of all employees, contractors, and third-party service providers acting on behalf of CAMLPR who have access to this information.

## 4.0 DEFINITIONS:

- **Personal Information:** Any information that relates to an identified or identifiable individual, including but not limited to name, address, email, phone number, date of birth, education, employment history, and immigration status.
- **Data Processing:** Any operation performed on personal data, whether automated or manual, including collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination, erasure, or destruction.
- **Data Subject:** An individual whose personal information is processed by CAMLPR.

## 5.0 PRINCIPLES:



- **Lawfulness, Fairness, and Transparency:** Personal information shall be processed lawfully, fairly, and in a transparent manner.
- **Purpose Limitation:** Personal information shall be collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.
- **Data Minimization:** Personal information shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- **Accuracy:** Personal information shall be accurate and, where necessary, kept up to date.
- **Storage Limitation:** Personal information shall be kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed.
- **Integrity and Confidentiality:** Personal information shall be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

#### **Data Collection and Use:**

- **Collection:** CAMLPR shall collect personal information from individuals through various means, including but not limited to forms, correspondence, inquiries, and applications.
- **Purpose:** Personal information shall be collected and used solely for defined purposes, including but not limited to responding to inquiries, evaluating applications, verifying credentials, administering assessments or events, managing stakeholder relationships, and improving services and communications.
- **Consent:** Individuals shall be informed of the purposes for which their personal information is collected and processed, and their consent shall be obtained where required by law.

#### **Data Protection Measures:**

- **Access Control:** Access to personal information shall be restricted to authorized personnel who require the information to perform their duties.
- **Encryption:** Personal information shall be encrypted during transmission and storage to protect against unauthorized access.



- **Physical Security:** Physical access to data storage areas shall be restricted to authorized personnel and protected by security measures such as locked cabinets and secure facilities.
- **Technical Security:** CAMLPR shall implement technical security measures, including firewalls, anti-virus software, and regular security audits, to protect personal information.

#### **Data Subject Rights:**

- **Access:** Data subjects have the right to request access to their personal information held by CAMLPR.
- **Correction:** Data subjects have the right to request the correction of inaccurate or incomplete personal information.
- **Erasure:** Data subjects have the right to request the erasure of their personal information when it is no longer necessary for the purposes for which it was collected, or when they withdraw their consent.
- **Objection:** Data subjects have the right to object to the processing of their personal information on legitimate grounds.
- **Data Portability:** Data subjects have the right to request the transfer of their personal information to another organization in a structured, commonly used, and machine-readable format.

#### **Data Retention:**

- **Retention Period:** Personal information shall be retained only for as long as necessary to fulfill the purposes for which it was collected and to comply with legal and regulatory requirements.
- **Destruction:** Personal information that is no longer needed shall be securely destroyed using methods such as shredding, degaussing, or secure electronic deletion.

#### **Breach Notification:**

- **Incident Reporting:** All employees, contractors, and third-party service providers must report any data breach or suspected data breach to the designated data protection officer immediately.



- **Investigation:** CAMLPR shall promptly investigate any reported data breach and take appropriate measures to mitigate the impact and prevent recurrence.
- **Notification:** Data subjects shall be notified of any data breach that is likely to result in a high risk to their rights and freedoms, and regulatory authorities shall be notified as required by law.

## 6.0 DOCUMENT HISTORY

Date	Action(s) Taken
Oct 30, 2023	Policy approved
June 10, 2025	Policy revised / Approved by Executive Director
June 17, 2025	Policy revised / Approved by Executive Director