



POLICY ID	GENERAL #1	SUBJECT	PRIVACY POLICY
SECTION	GENERAL		
EFFECTIVE DATE	NOVEMBER 9, 2005	REVIEW CYCLE	ANNUALLY
DATE AMENDED	JANUARY 24, 2019	NEXT REVIEW	2020

The CCEB recognizes the importance of privacy and the sensitivity of personal information. As an organization that tests potential licensed practitioners, CCEB acknowledges its obligation to serve a number of constituencies while ensuring that matters of confidentiality are recognized and adhered to. The protection of private information has always been an important part of the CCEB's operations. CCEB is committed to protecting any personal information that it holds. The employees and representatives of CCEB have been instructed as to the policy which the organization has established to handle personal information. This Privacy Policy outlines how CCEB manages personal information and safeguards privacy.

The CCEB's Privacy Policy sets out the CCEB's commitment to, and the policy on, privacy. It sets out the ways the organization ensures privacy and the confidentiality of the personal information that is collected by the CCEB.

#### Privacy Rights:

From January 1, 2004, all businesses engaged in commercial activities must comply with the Personal Information Protection and Electronic Documents Act, and the Canadian Standards Association Model Code for the Protection of Personal Information, which it incorporates. These obligations extend to testing organizations. The Act sets out rights concerning the privacy of your personal information. It may be found at the following website: <https://laws-lois.justice.gc.ca/eng/acts/P-8.6/>.

The CCEB is responsible for the personal information that it collects and holds. To ensure this accountability, it has developed this policy, and trained its staff and administration about its policies and practices.

#### Why the CCEB Needs Personal Information:

CCEB has a number of functions. Its primary mandate is to test future chiropractors. It also provides information related to the chiropractic profession. In doing so, it produces applicant and registrant lists, annual reports and a web site.

#### What personal information is collected?

Personal information is any information that identifies a person, or by which an individual's identity could be deduced.

If the CCEB did not collect and use personal information it could not test, hire staff or report information must be received by regulatory bodies, chiropractic institutions and others who require information related to the operations of the CCEB.

## How does the CCEB collect personal information?

The CCEB collects information only by lawful and fair means and not in an unreasonably intrusive way.

Wherever possible, it collects personal information directly from an individual at the application process, during the testing process, during the appeal process, and at the time of hiring of staff.

Sometimes information is obtained from other sources. For example,

### With respect to Examination Applicants:

- educational institutions
- health agencies in the event of an appeal or accommodation request

### With respect to Employees and Proctors:

- previous employers
- licensing boards

## Consent

In most cases, the CCEB will ask individuals for specific consent if it collects, uses, or discloses personal information. Normally, the CCEB will ask for consent in writing, but in some circumstances, it may accept oral consent. Sometimes, consent may be implied through conduct with the CCEB.

## Use of Information

The CCEB uses personal information to provide services with respect to such matters as testing, registration, and notice to licensing boards of successful completion of the CCEB examinations and information relating to such examinations. If the CCEB is advised that an individual or organization no longer wishes to receive information from the CCEB, it will not send any further material.

## Disclosure of Personal Information

The CCEB will disclose your personal information if, when, or where:

- an applicant or registrant has consented to the disclosure;
- the CCEB is required or authorized by law to do so, for example if a court issues a subpoena;
- the services the CCEB is providing requires it give personal information to third parties (for example, as directed in an application) consent will be implied, unless the CCEB is advised otherwise);
- it is necessary to collect applicant fees;
- if the CCEB engages a third party to provide administrative services to us (example, computer backup services or archival file storage) and the third party is bound by the CCEB privacy policy;
- the CCEB engages proctors on a contract basis;
- the CCEB undergoes any accreditation process for the purposes of continuing to carry out the services which it provides;
- the information is already public knowledge.

## Updating Information

Since the CCEB uses personal information to provide services, it is important that the information be accurate and up-to-date. It is important that the CCEB be advised of any applicant or registrant information changes so that its records can be updated.

## Is Personal Information Secure?

The CCEB takes all reasonable precautions to ensure that personal information is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect the information are:

- premises security;
- restricted access to personal information;
- deploying technological safeguards such as security software and firewalls to prevent hacking or unauthorized computer access;
- internal password and security policies.

## Access to Personal Information

An individual may ask for access to any personal information that the CCEB holds about said individual.

Summary information is available on request. More detailed requests which require archive or other retrieval costs may be subject to professional and disbursement fees.

## Correcting Errors

If the CCEB holds information about an individual who can establish that it is not accurate, complete and up-to-date, CCEB will take reasonable steps to correct it.

## Can Access to Personal Information be Denied?

An individual's right to access personal information is not absolute.

The CCEB may deny access when:

- denial of access is required or authorized by law (for example, when a record containing personal information about an individual is subject to a claim of legal professional privilege);
- information relates to existing or anticipated legal proceedings against an individual;
- granting an individual access would have an unreasonable impact on other people's privacy;
- doing so would prejudice negotiations with an individual;
- protecting the CCEB's rights and property
- the request is frivolous or vexatious.

If the CCEB denies a request for access to, or refuses a request to correct information, it shall explain why.

### Communicating with the CCEB

When contacting the CCEB to send personal or confidential information, individuals should be aware that email and voicemail are not 100% secure.

### Changes to this Privacy Policy

Since CCEB regularly reviews all its policies and procedures, it may periodically modify its Privacy Policy.

### Requests for Access

For the purposes of dealing with any questions, or with respect to access to personal information, please write to the CCEB's Privacy Contact at:

Canadian Chiropractic Examining Board  
Suite 230, 1209 - 59 Avenue SE  
Calgary, Alberta  
T2H 2P6  
Attention: Privacy Officer

If you are not satisfied with our response, the Privacy Commissioner of Canada can be reached at:

30, Victoria Street  
Gatineau, Quebec  
K1A 1H3  
1 (800) 282-1376

### Employment, Consultant and Volunteer Inquiries

If you apply to CCEB for employment, the CCEB will need to consider an applicant's personal information as part of its review process. The CCEB normally retains information from applicants after a decision has been made, unless it is asked to not retain the information and the CCEB deems it appropriate to refrain from retaining the information. If an offer of a position is provided to an individual who accepts same, the information will be retained in accordance with the CCEB's privacy procedures for employee, consultant and volunteer records.

### Website

The CCEB website contains links to other sites which are not governed by this privacy policy. Like most other websites, the CCEB website monitors traffic patterns, site usage and related site information in order to optimize web service. While the CCEB may provide aggregated information to third parties, these statistics do not include any identifiable personal information.

### Scope

This Policy applies to all CCEB examination Candidates.

### Responsibility

Approval (Policy): Changes to this policy must be approved by the CCEB Board of Governors.

