

## Privacy Statement

### Our Commitment to Privacy

Protecting the privacy and confidentiality of personal information is an important aspect of the way Windsor Essex Community Housing Corporation (CHC) conducts its business. Collecting, safeguarding, limiting use and disclosure and destruction of personal information in an appropriate, responsible, and ethical manner is fundamental to Windsor Essex Community Housing Corporation (CHC)'s daily operations.

CHC strives to protect and respect personal information of its customers, employees, business partners, and so on in accordance with all applicable regional and federal laws. Each staff member of Windsor Essex Community Housing Corporation (CHC) must abide by this organization's procedures and practices when handling personal information.

### Applicability

This Privacy Statement informs everyone of Windsor Essex Community Housing Corporation's (CHC's) commitment to privacy and establishes the methods by which privacy is ensured. This Privacy Statement applies to all personal information within Windsor Essex Community Housing Corporation's (CHC's) possession and control.

**Personal information** is defined as any identifying information about an individual or group of individuals, including name, date of birth, address, and phone number, e-mail address, social insurance number, nationality, gender, health history, financial data, credit card numbers, bank account numbers, assets, debts, liabilities, payment records, credit records, loan records, opinions, and personal views.

**Business information** is defined as business name, business address, and business telephone number, name of owner, executive-officer, and director, job titles, business registration numbers, and financial status. Business information is treated and handled with the same level of confidentiality, privacy, and respect as personal information.

Consent occurs and is obtained when an individual signs an application or other form containing personal information, or provides consent in person, by phone, by mail, via the Internet, thereby authorizing Windsor Essex Community Housing Corporation (CHC) to collect, use, and disclose the individual's personal information for the purposes stated on the form or in the Appropriate Use section of this policy.

- Implied consent is granted by the individual when he/she signs the application or form. This allows Windsor Essex Community Housing Corporation (CHC) to obtain or verify information from third parties (such as banks, credit bureaus, lenders, or insurance companies) in the process of assessing the eligibility of an individual, customer, client, job applicant, or business partner.

### Appropriate Use

Windsor Essex Community Housing Corporation (CHC) collects and uses personal information solely for the purpose of conducting business and is limited to that which is necessary for the purposes identified by CHC. Information is to be collected by fair and lawful means. Windsor Essex Community Housing Corporation (CHC) hereby asserts that personal information will only be used for the following purposes:

1. Delivery of services
2. Protecting tenants and CHC staff and property
3. Quality management

4. Research
5. Such other purposes required or permitted by law

## Policy Statements

1. Windsor Essex Community Housing Corporation (CHC) assumes full accountability for the personal information within its possession and control. This organization has appointed Director, Corporate Services or designate as custodian of all privacy matters and legal compliance with privacy laws.
2. Generally, Windsor Essex Community Housing Corporation (CHC) obtains personal information directly from the individual to which the information belongs or someone acting on their behalf. Sometimes CHC collects personal information by recording how individuals interact with us. More specifically:
  - CHC employs video surveillance systems at our housing locations, capturing imagery of both the exterior and interior common areas, as well as at our office locations. While these video surveillance systems may not be operational at all times and may be monitored on a live or recorded basis, CHC does not guarantee that they will be operational, monitored or recorded at all times or at any particular time. If CHC is alerted to criminal activities through our surveillance systems, generally it is CHC's practice to alert law enforcement authorities but we are not obligated in that regard and do not guarantee that reports will be made.
  - When you view our website your internet protocol (IP) address, your browser type and the date and time of your visit are automatically logged. IP addresses are unique numbers assigned by internet service providers to all devices used to access the Internet. The IP address on its own does not identify you and while we generally do not try to link it with other data, it is possible. We also employ digital markers. A digital marker is a small file placed on your computer. A "cookie" is an example of a digital marker. Our digital markers allow us to recognize a previous visitor to our website. They also allow us to track what information is viewed, for how long, the sequence and other information. Further, we offer certain features on our website. For example, you can send us an email and register a contractor account. Our features change from time to time as we make improvements to our website. Depending on the feature you use, we collect a variety of additional personal information, such as for examples, your name and email address.
3. Under no circumstances will Windsor Essex Community Housing Corporation (CHC) sell, distribute, or otherwise disclose personal information or contact lists to third parties. However, limited disclosure may be required as part of Windsor Essex Community Housing Corporation (CHC) fulfilling its stated business duties and day-to-day operations. This may include consultants, suppliers, or business partners of Windsor Essex Community Housing Corporation (CHC), but only with the understanding that these parties obey and abide by this Privacy Policy, to the extent necessary of fulfilling their own business duties and day-to-day operations.
4. Windsor Essex Community Housing Corporation (CHC) will retain personal information for as long as reasonably necessary for us to complete our dealings with you or as required by law, whichever is longer. Once personal information is no longer required, it will be destroyed in a safe and secure manner.
5. Windsor Essex Community Housing Corporation (CHC) will protect personal information with the appropriate security measures, physical safeguards, and electronic precautions. CHC maintains personal information through a combination of paper and electronic files. Where required by law or disaster recovery/business continuity policies, older records may be stored in a secure, offsite location.
  - Access to personal information will be authorized only for the employees including students and other agents of Windsor Essex Community Housing Corporation (CHC) who require the information to perform their job duties, and to those otherwise authorized by law.

- Windsor Essex Community Housing Corporation (CHC)'s computer and network systems are secured. Only authorized individuals may access secure systems and databases.
  - Active files are kept in locked filing cabinets.
  - Routers and servers connected to the Internet are protected by a firewall, and are further protected by virus attacks or "snooping" by sufficient software solutions
6. In most instances, Windsor Essex Community Housing Corporation (CHC) will grant individuals access to their personal information upon presentation of a written request and satisfactory identification. If an individual finds errors of fact with his/her personal information, please notify Windsor Essex Community Housing Corporation (CHC), Director of Corporate Services, as soon as possible to make the appropriate corrections. Should Windsor Essex Community Housing Corporation (CHC) deny an individual's request for access to his/her personal information, (CHC) will advise in writing of the reason for such a refusal. The individual may then challenge the decision.
7. Windsor Essex Community Housing Corporation (CHC) may use personal information without the individual's consent under particular circumstances. These situations include, but are not limited to:
- Windsor Essex Community Housing Corporation (CHC) is under obligation by law to disclose personal information in order to adhere to the requirements of an investigation of the contravention of a regional or federal, under the purview of the appropriate authorities.
  - An emergency exists that threatens an individual's life, health, or personal security.
  - The personal information is for in-house statistical study or research.
  - The personal information is already publicly available.
  - Disclosure is required to investigate a breach of contract.

## **Conclusion**

Any questions or concerns regarding this Privacy Statement can be addressed by contacting us at:

Windsor Essex Community Housing Corporation  
945 McDougall Street  
Windsor, Ontario  
N9A 1L9  
Attn: Director of Corporate Services

You may call us at 519-254-1681 extension 3030 or email us at [info@wehc.com](mailto:info@wehc.com)

Windsor Essex Community Housing Corporation (CHC) will investigate and respond to concerns about any aspect of the handling of personal information. This organization will address concerns to the best of its abilities.

## **Notice**

CHC may amend this Privacy Statement at any time by posting amended terms.