

**CANADIAN CHIROPRACTIC EXAMINING BOARD**  
**“CCEB”**  
**Policy**

## **PRIVACY**

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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 operation. 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.

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. The following is the web site at: <http://laws.justice.gc.ca/en/P-21/94401.html#rid-94449>.

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 CCEB Needs Personal Information:***

CCEB has a number of functions. Its primary mandate is to test future chiropractors. It also functions as a research facility and 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 that is necessary to be received by regulatory bodies, chiropractic institutions and others who require information related to the operation of the CCEB.

***How does the CCEB collect personal information?***

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;
- from health agencies in the event of an appeal;

**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***

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 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***

Under certain circumstances, CCEB will disclose your personal information:

- when an applicant or registrant has consented to the disclosure;
- when the CCEB is required or authorized by law to do so, for example if a court issues a subpoena;
- when 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);
- where 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;
- if the CCEB engages proctors on a contract basis;
- if the CCEB undergoes any accreditation process for the purposes of continuing to carry out the services which it provides;
- if 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. If, as an applicant or registrant any information changes, it is important that the CCEB be advised of any changes so that its records can be updated.

### ***Is Personal Information Secure?***

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 file 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 the 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 CCEB holds information about an individual and he or she 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. 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 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***

Individuals should be aware that e-mail and voice mail are not 100% secure mediums, and should be aware of this when contacting the CCEB to send personal or confidential information.

***Changes to this Privacy Policy***

Since CCEB regularly reviews all of its policies and procedures, it may change its Privacy Policy from time to time.

***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 103, 1144 29<sup>th</sup> Avenue NE  
Calgary, Alberta  
T2E 7P2  
Attention: Privacy Officer

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

112 Kent Street  
Ottawa, Ontario  
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 determines 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's records.

***Website***

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