POLICY – PRP – PRIVACY

Policy Sponsor:	Board of Directors or by delegated authority the Executive Director
Policy Contact:	Executive Director or by delegated authority the Director of HR
Policy Number:	7-8
Effective Date:	May 1, 2013
Approval Group:	Board of Directors or by delegated authority MCIS' HR Committee
Approval Date:	April 4, 2013
Review Date:	This policy will be reviewed annually

Purpose:

- MCIS values the privacy rights of its employees, customers and their clients, language professionals (including interpreters, translators, proofreaders, and editors), and other independent contractors. MCIS is therefore committed to maintaining the accuracy, confidentiality, and security of their personal information.
- This privacy policy explains how MCIS collects, uses, discloses, and safeguards all personal information provided to MCIS.

Definitions:

Personal Information:	It means recorded information about an identifiable individual as specified in the Personal Information Protection and Electronic Documents Act (PIPEDA).

About the Policy:

Our *Privacy Policy* has been designed to inform individuals of MCIS' commitment to protecting personal information and complying with applicable privacy legislation governing the collection, use, disclosure, retention, and safeguarding of personal information.

All MCIS employees, volunteers, Board & Committee members, independent contractors as language professionals (interpreters, translators, proofreaders, and editors), and other contractors who may be privy to this information in their work with/for MCIS, must abide by this Privacy Policy. A violation of the standards set out in this policy constitutes misconduct and appropriate disciplinary measures will be taken.

Policy Statements:

- **Electronic Monitoring:** In accordance with the Employment Standards Act, 2000 (Ontario), MCIS is committed to transparency and respect for employee privacy. MCIS does not engage in the routine or active monitoring of employees' private communications, including private chats, emails, or other communications within employee company accounts, nor is such monitoring a practice that aligns with MCIS' values or culture. The Information Technology team does not have independent authority to access or monitor employee communications except as required for legitimate operational purposes such as system maintenance, security incident response, or compliance with applicable laws*. Access to employee

communications will only occur where legally required or permitted, including response to a lawful order, regulatory obligation, or other requirement mandated by applicable legislation**. Where electronic monitoring is undertaken, it will be limited, purposeful, and conducted in a manner consistent with applicable legal requirements and this Policy***.

**This refers to situations where the IT team may require temporary access to employee systems or company accounts. For example, IT support may request access when performing remote maintenance, troubleshooting technical issues, or providing assistance at the employee's request, such as during a remote support session using authorized tools (AnyDesk). Similarly, IT may briefly access company-issued devices when conducting system upgrades, security updates, or hardware replacements across the organization, after which devices are returned to employees. In rare and serious situations, such as a confirmed cybersecurity incident, phishing attack, or other breach that poses a risk to the MCIS' data or infrastructure, access to certain employee accounts may be necessary to investigate the incident, contain potential harm, and protect organizational systems.*

***This also covers situations where MCIS is subject to a court order or subpoena, that legally requires to obtain access to specific information or accounts.*

****In all cases, whether for maintenance, security, or legal reasons, any access to employee accounts will be limited to what is strictly necessary, only for the stated purpose, and always in compliance with the law.*

- Our Privacy Policy incorporates and expands the 10 principles for the protection of personal information, as devised by the Canadian Institute of Chartered Accountants.

1. Principle 1 - Management
    - MCIS is accountable for the protection of all personal information within the organization's possession or control, including any personal information that has been transferred to a third party for regulatory, legal, or processing purposes. MCIS will require a comparable level of protection of this information from its third-party relations.
    - MCIS has a Privacy Officer who is responsible for ensuring MCIS' compliance with the principles and this privacy policy. If individuals have questions about this privacy policy or MCIS' use of their information, or if individuals need help changing their personal information, they can contact the Privacy Officer by email at privacy@mcis.on.ca.

2. Principle 2 - Notice
    - MCIS collects personal information for the purpose of providing services to our customers, their clients, employees, trainees, and independent contractors, which substantially include but are not limited to, the following services:
        a. Interpretation.
        b. Translation.
        c. Transcription.
        d. Language Testing.

e. Interpreter and Translator Training.
f. Training for Employees and Customers.

- When an organization requests our services and/or when an independent contractor as a language professional (interpreter, translator, proofreader, or editor) with MCIS, MCIS informs the individual of the purposes for which MCIS is requesting the personal information.
- If MCIS identifies other purposes for which the personal information may be used, MCIS will seek the individual's consent prior to such use.
- MCIS will advise that it is the individual's right to refuse permission for MCIS to use personal information for any new purposes.

3. Principle 3 - Consent
   - MCIS will obtain consent before or when it collects, uses, or discloses personal information about an individual.
   - An individual can provide consent to the collection, use, and disclosure of personal information about them expressly or implicitly.
   - MCIS will collect, use or disclose personal information without an individual's consent only in limited circumstances, as permitted by law.
   - Subject to certain legal and contractual restrictions and reasonable notice, any individual can refuse or withdraw their consent to the collection, use, or disclosure of personal information about them at any time.
   - All customers will be informed of what types of personal information have been collected, the purpose for the collection, and the procedures available for contacting MCIS with any inquiries.
   - *By providing personal information to us, individuals consent to our collection, use, and disclosure of their personal information in accordance with this Privacy Policy.*

4. Principle 4 – Collection
   - MCIS limits the amount and the type of personal information it collects to what is necessary for the business. Personal information will be collected using procedures that are fair, transparent, and lawful.
   - The information that MCIS collects from individuals includes:

Board & Committee Members:

- Member's name, address, and other contact information, such as telephone numbers and email addresses.
- Vulnerable sector check – police clearance.

Employees:

- The employee's name, address, and other contact information, such as telephone numbers and email addresses.

- Employee's emergency contact information, including name, relationship to the individual, and telephone numbers.
- Employee's bank information.
- Social Insurance Number (SIN).
- Vulnerable sector check – police clearance.
- Proof of eligibility to work.
- Reference letters.
- Credit check as applicable for certain positions.
- Information and documents to obtain a Federal Security Clearance to securely handle Protected A and B documents.

Customers:

- The customer's name, address, and other contact information, such as telephone numbers and email addresses.

Clients:

- The client's name, address, and other contact information, such as telephone numbers and file numbers if applicable for billing purposes.

Independent contractors:

- The independent contractor's name and address and other contact information, such as telephone numbers and email addresses.
- Work and education history.
- Feedback from our customers about the use of our interpretation and translation services.
- Independent contractor's bank information.
- Vulnerable sector check – police clearance.
- Information and documents to obtain a Federal Security Clearance, as per client and contract requirements.

5. Principle 5 - Retention
   - MCIS will develop explicit retention periods for a reasonable period of time in order to conduct our business. We will retain personal information for any period required by law, please refer to the *Records Retention and Disposal Policy* for further details.

6. Principle 6 – Accuracy and Access
   - In order to ensure the reliable delivery of interpretation and translation services and the correct billing for such services, all personal information will be kept as accurate, complete, and up to date as possible.
   - Personal information in MCIS' possession will be disclosed as required under governing privacy laws. Any individual may request that their personal information be amended for purposes of accuracy and completeness, and have it amended where the information is proven to be incorrect.
   - Upon written request, MCIS shall inform individuals of:

- The type of personal information we have collected.
- How we have used individuals' personal information in the past, and how we may use it in the future.
- Whether or not we have disclosed an individual's personal information to any third parties (and if so, to whom).

- Individuals can make their requests via email at privacy@mcis.on.ca or in writing to MCIS' address: 789 Don Mills Rd., Suite 1010, Toronto, ON M3C 1T5.
- MCIS will be able to provide individuals with any information or correct any inaccuracies provided that individuals confirm their identity and provide additional information to help MCIS respond to their request in a timely and efficient manner.

7. Principle 7 – Disclosure to Third Parties
   - Except as explained in this privacy policy, as required by law or regulation or as otherwise consented to by the individual, we do not disclose any personal information to third parties.
   - The following are the limited instances where we may disclose the individual's personal information to the following third parties for the following uses:

Employees:

- Employee's bank information for direct deposit.
- Social Insurance Number for tax purposes.
  ***NOTE**: every employee who is assigned a new Social Insurance Number or provided with a new period of validity for their Social Insurance Number shall inform MCIS of their new number or period of validity within three days after the day on which they receive it.*

Customers:

- The customer's names to other potential customers when submitting a Request for Proposal for potential contracts.
- This will occur only if the parties have entered into an agreement under which the collection, use, and disclosure of the information is restricted to those purposes that relate to the business transaction, including a determination whether or not to proceed with the business transaction, and is to be used by the parties to carry out and complete the business transaction.

Clients:

- The Client's first name is to be disclosed to language service professionals only for interpretation purposes.
- MCIS may disclose personal information to language service professionals who perform interpretation services on behalf of the company.
- Personal Information will only be provided to language professionals who agree to use such information solely for the purposes of providing interpretation services to MCIS and under the instruction of MCIS and, with respect to that information, to act in a manner consistent with the

relevant principles articulated in this Policy.

Independent Contractors:

- Independent contractor's bank information for electronic fund transfer.
- The independent contractor's name and address and other contact information, such as telephone numbers and email addresses for interpretation purposes to other interpretation and translation agencies.
- Work and education history to other potential customers when submitting a Request for Proposal for potential interpretation and translation contracts.
- The independent contractor's names to other potential customers when submitting a Request for Proposal for potential interpretation and translation contracts.
- By signing the document "Consent to Release Information", Language Professionals give MCIS the consent to release information to other interpretation or translation agencies and any other customer with whom they may be booked to work as interpreters or translators. This will occur only if the parties have entered into an agreement under which the collection, use, and disclosure of the information is restricted to those purposes that relate to the interpretation and translation services.

8. Principle 8 – Security for Privacy

- In executing its responsibilities with respect to the confidentiality of personal information, MCIS will employ a number of safeguards, appropriate to the sensitivity of the information, to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification.
- In the event that personal information is transferred to a third party, MCIS will use its best efforts to ensure that recipients safeguard personal information and use the information only for authorized purposes.
- Some examples of such measures are as follows:
    - Physical security measures such as restricted access facilities and locked filing cabinets.
    - Electronic security measures for computerized personal information such as password protection, database encryption, and personal identification numbers.
    - The BYOD (Bring Your Own Device) that accesses MCIS network resources will follow on-boarding and off-boarding measures and will be monitored to ensure data privacy in a BYOD environment.
    - Organizational processes such as limiting access to such personal information to a selected group of individuals.
    - Contractual obligations with third parties that require access to personal information, by agreements stipulating the confidentiality of the information and requiring them to protect and secure the personal information.
- Only employees with a business need-to-know, or whose duties reasonably so require, are granted access to personal information and shall be required to respect the privacy of that information.
- ***Our Board & Committee Members, Employees, Customer & Their Clients' Personal Information:***

- In the course of daily operations, access to private, sensitive, and confidential information is restricted to authorized employees and Board & Committee Members who have a legitimate business purpose and reason for accessing it.
- Unauthorized access to and/or disclosure of personal information held by MCIS, by an employee, volunteer, Board or Committee Member, independent contractors as language professionals (interpreters, translators, proof-readers, or editors), or other contractors who may be privy to this information in their work with the organization, is strictly prohibited.
- All noted parties are expected to maintain the confidentiality of personal information at all times and failing to do so will result in appropriate disciplinary measures, which may include dismissal.

9. Principal 9 – Quality
   - We shall make every reasonable effort to ensure each individual's personal information is accurate, complete, and up to date.
   - Individuals are responsible for advising MCIS of any inaccuracies or changes to their personal information. Such inaccuracies or changes may be reported to privacy@mcis.on.ca.

10. Principle 10 – Monitoring and Enforcement
    - MCIS will make its policies and practices relating to the protection of personal information available to the above-mentioned individuals. MCIS will keep the individuals informed of these policies and practices and they will be provided access to all related policies and procedures via MCIS' web page. The information will be available in a format that is easy to understand.
    - If individuals have questions about this policy or MCIS' use of the individual personal information, or if the individual needs help to change their personal information, please contact the Privacy Officer by email at privacy@mcis.on.ca.
    - MCIS has established policies and procedures to receive, investigate and respond to individuals' complaints and questions.
    - As a matter of course, any breaches to the policy shall be reported to the MCIS Board's Human Resource Committee on a monthly basis. The Committee will determine appropriate disciplinary measures and whether the matter needs to be escalated to the Board as a whole. If a complainant is not satisfied with the way MCIS has responded to a question or complaint, the individual can contact the Privacy Commissioner of Canada.
    - When there is an incident involving unauthorized access to, use of, disclosure of, or loss of sensitive, non-public customer information, MCIS will undertake a reasonable investigation to promptly determine the nature and extent of the incident and the likelihood that the information has been or maybe misused. If it is determined that misuse has occurred or misuse is reasonably possible, MCIS will notify the affected individuals as soon as possible.

Web Sites Governed by this Privacy Policy:

- MCIS' website (www.mcislanguages.com) provides potential customers, the general public, and independent contractors with basic information on the company and its services. At present, Google Analytics is collecting IP address information of site visitors that is reported to us in aggregate form only which does not make it personally identifiable to MCIS. We also do not make any attempt to link these IP addresses with the identity of visiting individuals.
- MCIS' website may contain links to other third-party sites that are not governed by this policy.
- Although MCIS endeavours to only link to sites with high privacy standards, MCIS privacy policy will no longer apply once individuals leave MCIS' Web site. Additionally, MCIS is not responsible for the privacy practices employed by third-party websites. Therefore, MCIS suggests that individuals examine the privacy statements of those sites to learn how information may be collected, used, shared, and disclosed.

Updating this Policy:

- Any changes to MCIS' Privacy Policy and information handling practices will be acknowledged in this policy in a timely manner. MCIS may add, modify or remove portions of this policy when considered appropriate to do so. Individuals may determine when this policy was last updated by referring to the **History** section at the bottom of this page.

Applicable Legislation and Regulations:

- Personal Information Protection and Electronic Documents Act (PIPEDA)
- Records Retention - CRA

Related References, Policies, Procedures, and Forms:

- Policy - RRD - Records Retention and Disposal
- Policy - DPB - Acceptable Use of Desktops and Portable Electronic Devices

History:

- Created in 2010
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