



Institute of Chartered Accountants of Nova Scotia

Policy Statement on the Collection, Use and Disclosure Of Personal Information

The Institute of Chartered Accountants of Nova Scotia (ICANS) is a professional organization committed to protecting the public interest while enhancing the interests of its diverse membership.

Consistent with these objectives and its mandate, ICANS is dedicated to maintaining high standards of confidentiality with respect to the information that has been provided to us. This Policy Statement has been prepared to affirm our commitment to maintaining the privacy of our members¹ and others, and to inform you of our practices concerning the collection, use and disclosure of information provided to ICANS.

Our obligations apply to all Council members, employees, contractors and agents who provide services to or on behalf of ICANS in connection with our delivery of products, services and information to our members. Other applicable laws and internal ICANS policies govern the protection of personal information of employees of ICANS.

ICANS collects information about members through its membership registration form (available in both a paper and Web-based format) and receives updated information from its members in various forms of communication, to allow it to fulfill its objectives and mandate. ICANS may also collect personal information from others through registration forms which is retained for only short periods of time.

Contact Information

ICANS' mandate and objectives are to regulate the CA profession within Nova Scotia. The achievement of ICANS' objectives involves, among other things, communicating with and determining the needs of its membership, providing products, services and information to its members, and permitting affiliated organizations and Preferred Suppliers² to provide products, services and information to members. If a member consents, his/her contact information shall be used for these purposes. Contact information is a member's name, firm, address, telephone number, fax number and email address. The submission of a membership application or update constitutes the consent of an applicant to the use of his or her contact information for these purposes.

If a member specifically requests in writing to the Membership Registrar, his/her contact information shall be used by ICANS and its affiliated organizations for purposes of communicating with the member only and shall not be provided to Preferred Suppliers.

ICANS endeavours to maintain the accuracy of any information about members in its possession. It does so by encouraging members to provide up-to-date and complete information on a timely basis – the accuracy of the information is therefore dependent on members submitting this information. Information pertaining to a former member is not actively maintained and, for so long as it is held by ICANS, ICANS cannot assure the continued accuracy of such information.

ICANS also collects information about members and non-members through registration forms for a variety of programs including, but not limited to, professional development seminars and courses, members and student functions, and other activities. It does so to fulfill its objectives and mandate. In providing these programs, ICANS is supported by Preferred Suppliers, Sponsors and Exhibitors, to

¹ Unless otherwise specified, "Member" includes Chartered Accountants who are registered members in good standing and registered students of the Institute as well as former members and students of the Institute.

² A list of Preferred Suppliers is attached as an Appendix to this Policy Statement.

whom contact information may be made available, provided consent is obtained during the registration process.

Additional Information

The Institute collects and maintains additional membership information to allow it to fulfill its mandate and objectives that may be considered to be more than the minimum contact information. Some of this information may be considered to be private information. This membership information is held in strict confidence and, with the exception of the following, is not revealed to anyone unless expressly or implicitly authorized by the member.

Disclosure of Contact and Additional Information To Third Parties

ICANS respects the confidentiality and right to privacy of its members, and has strict policies regarding the disclosure of contact and additional information to other members and to third parties.

ICANS does provide membership contact information that may include residential addresses on a limited basis to Preferred Suppliers and to agencies who are engaged to provide mailing services; and;

ICANS does exchange membership information, including both contact and other information, with the following affiliated organizations:

- the Atlantic School of Chartered Accountancy (ASCA);
- the Canadian Institute of Chartered Accountants (CICA);
- other Provincial Institutes of Chartered Accountants; and
- the Institute of Chartered Accountants of Bermuda

but only when:

- in the opinion of ICANS, such provision and exchange constitutes a service and the information is pertinent to the members of ICANS; and
- ICANS has the written agreement of Preferred Suppliers, contracted agencies, and the affiliated organizations to adhere to specified requirements with respect to their use of such information.

To illustrate the nature of these specified requirements, ICANS membership information:

- is to be protected from unauthorized access or use, in a manner that is consistent with the ICANS Policy Statement;
- is not to be used in connection with any communication, which, in the opinion of ICANS, would tend to mislead, misinform or deceive or which is distasteful in content or presentation or is illegal. ICANS requires that any intended communication is provided to ICANS for review prior to the release of ICANS membership information;
- may only be used in connection with relevant accounting publications or services deemed by ICANS to be pertinent to its members; and
- may not be used in connection with any fundraising efforts, unless there has been prior written consent of the Institute.

Member Access to Their Personal Information

To assist ICANS in fulfilling its mandate, members are encouraged to update their records and personal information on a timely basis. An individual member may access and verify his/her personal information, what it is used for, and who it was disclosed to, at any time by contacting the Membership

Registrar. Contact information is readily available on the Institute website.

Retention of Personal Information

ICANS will retain information provided to it, including personal information, only for so long as it is considered necessary for the purposes it was gathered. When records that may contain personal information are discarded, care is taken to ensure that their destruction is secure and confidentiality is maintained.

Protection from Unauthorized Access

ICANS endeavours to maintain adequate physical, procedural and technical security with respect to its offices and information storage facilities so as to prevent any unauthorized access, disclosure, copying, use, or modification of a member's personal information.

Storage

Membership information is kept in in-house databases that are maintained on a server over which ICANS maintains security safeguards to reduce the risk of any unauthorized access to a member's personal information.

Access to Databases

Only ICANS employees have access to ICANS databases. All employees who work with member's personal and business data maintain strict confidentiality of all information. Employees are encouraged to clear out their caches periodically, and/or to ensure User Names and Passwords are kept confidential.

In exceptional situations when external computer service personnel or consultants are provided with restricted access to data base information, ICANS ensures that such personnel or consultants are prohibited from using, disclosing, and retaining the information for purposes other than to carry out the service they have been contracted to provide, and are bound by contractual obligations that have been designed to protect the privacy and security of member information.

Transfer of Information

Membership information is transferred electronically and physically among the membership, ICANS and affiliated organizations and Preferred Suppliers in a variety of formats. Members are advised when confidential information is being transferred in a non-secure format and may, at their option, decline to provide information to the Institute in that format.

Privacy of the ICANS Website

The ICANS website does not contain any personal information of the membership. Visitors to the website are not required to reveal any individually identifiable information, such as name, address, or telephone number. Nor is such information collected passively by electronic means.

Information is collected when an individual voluntarily completes an online membership application form or completes an online survey. This information is collected, used or disclosed in a manner consistent with this policy statement. E-mail addresses are also collected during the online membership application process but applicants may indicate that they do not wish to receive any unsolicited electronic communication.

ICANS' Internet Service Provider logs website users' Internet Protocol (IP addresses) but does not link them to anything personally identifiable. This means that a user's session will be tracked, but the user will be anonymous. This information is used internally, only in aggregate form, to better serve visitors by helping us to:

- manage our site

- diagnose any technical problems; and
- improve the content of the website

Following its use, the information collected is not retained but, rather, is discarded in a secure manner.

In browsing the Internet, you will encounter a technology called “cookies” which can be used to provide you with specific information from a website as well as provide the operator of a website with information about you. A “cookie” is an element of data that a website can send to your browser, which may then store it on your system. You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it. The ICANS website does not require the use of cookies, therefore they are not created or collected on any page throughout the site.

ICANS does not have a relationship with any ad server company. If at some future date, a relationship is formed, the terms of the relationship will not permit any ad server company to collect information about users such as domain type, IP address, and click stream information.

Use of Links

The Institute employs links to other websites in both electronic communications and on the ICANS website itself. ICANS makes every effort to link only to websites that share its high standards. ICANS endeavours to ensure these links are reputable, but the privacy and data collection practices on any linked websites are entirely separate from the Institute and are not covered by this Policy Statement. Other websites that may contain material that ICANS does not approve of may also link to this site without the Institute's knowledge or consent. The Institute has no responsibility for the content, policies or actions of these websites.

Legal Duty or Right to Disclose Personal Information

There are circumstances where disclosure of personal information may be required or permitted under a legal duty or right and ICANS may disclose member information without consent. Personal information may include all information about members collected on the membership application form. In such circumstances where, in the opinion of ICANS, it is appropriate or necessary to disclose personal information, ICANS will not disclose more information than is required.

Evolving Practices

This Policy Statement is in effect as of January 1, 2004. ICANS will from time to time review and revise its privacy practices and this Policy Statement. In the event of any amendment, a notice will be posted on www.icans.ns.ca and published in appropriate ICANS publications. Policy changes will apply to the information collected from the date of posting to the Website as well as to existing information held by ICANS.

Questions

While specific responsibilities may be assigned to other members of ICANS's staff, the Chief Privacy Officer is responsible for the administration of this Policy Statement. In the event of any question concerning the access to or the accuracy, management or use of a member's personal information, members should address such questions to ICANS's Chief Privacy Officer, 1791 Barrington Street, Suite 1101, Halifax, NS B3J 3L1 or through e-mail at icans@icans.ns.ca.

Appendix To Private Policy Statement ICANS Preferred Suppliers Network

The ICANS Preferred Supplier Network is made up of companies who service the accounting market and support ICANS. Each of these companies offers ICANS members value added products and services that can enhance ICANS' members' professional and personal bottom line. These companies also support the Institute through sponsorship and advertising and hence contribute to the Institute's ability to service its members.

The following companies are presently members of the ICANS Preferred Supplier Network:

- Johnson Insurance Inc.