



POLICY ID	BP-C-04	SUBJECT	PRIVACY POLICY
SECTION	COMMUNICATIONS		
EFFECTIVE DATE	NOVEMBER 9, 2005	REVIEW CYCLE	EVERY TWO YEARS
DATE AMENDED	FEB 20, 2021	NEXT REVIEW	WINTER 2023

## Policy

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 CCEB's personnel and representatives have been instructed as to the policy which the organization has established to handle personal information.

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

Your personal information is governed by certain federal legislation, the *Personal Information Protection and Electronic Documents Act* (PIPEDA), and in some cases by provincial privacy legislation, which the CCEB complies with. 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 personnel and administration about its policies and practices.

## What is personal information?

Personal information is any information that identifies a person, or by which an individual's identity could be deduced, other than the person's business title or business contact information when used or disclosed for the purpose of business communications.

## Why the CCEB needs personal information

The CCEB collects personal information to enable us to manage, maintain, and develop its business and operations, including:

- to establish, maintain and manage our relationship with individuals so that it may provide them with, or receive from them, the services requested or required;
- 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
- to be able to review the products and services that it provides so that it may understand the requirements of individuals it interacts with;
- to be able to comply with the requests of individuals; and
- any other reasonable purpose to which the person consents.

### What personal information is collected?

The personal information we collect includes:

- contact and identification information, such as names, addresses, telephone numbers and email addresses;
- education information;
- information related to the taking of or proctoring of examinations;
- Information from third-party contractors, suppliers, and consultants who provide services to the CCEB; and
- Website-specific information regarding requests and choices an individual may have made and other general information such as IP addresses, “cookies”, and URL addresses.

### How does the CCEB collect personal information?

The CCEB collects information only by lawful and fair means and not in an unreasonably intrusive way. In accordance with best practices outlined by the Office of the Privacy Commissioner of Canada, the CCEB refrains from collecting more personal information than is necessary to fulfill its identified purpose.

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

Sometimes information is obtained from other sources. For example, this may include:

#### With respect to examination applicants:

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

#### With respect to contractors:

- applicable licensing boards

### How does the CCEB use and disclose personal information?

The CCEB uses and discloses personal information:

- for the purpose described in this Privacy Policy; and
- for any additional purposes for which we have obtained consent to use or disclose the personal information.

Personal information may be used or disclosed:

- an applicant or registrant has consented to the disclosure;
- as permitted or required by applicable law or regulatory requirements;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- as part of the CCEB’s regular reporting activities;
- to protect the rights and property of the CCEB;
- to take precautions against liability;
- the services the CCEB is providing requires that 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;
- during emergency situations or where necessary to protect the safety of a person or groups of persons;

- 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; or
- with the individual's consent or as otherwise required or authorized by law. The CCEB will only use or disclose personal information without consent where permitted or required by regulatory law to do so.

### Your consent is important to the CCEB

Consent may be implied or express. Implied consent is consent that can reasonably be inferred from an individual's action or inaction. For example, when a candidate wishes to take an examination, the CCEB will assume that person consents to the collection, use and disclosure of his or her personal information for purposes related to the testing and for any other purpose identified to the individual at the relevant time.

### Choice/Withdrawal of Consent

An individual may change or withdraw his or her consent at any time, except where it is required to fulfill the CCEB's legal or contractual obligations, and subject to reasonable notice, by contacting the Privacy Officer using the contact information set out below.

### 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 personal information changes so that its records can be updated.

### 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.

### Is personal information secure?

While no data transmission (including over the Internet or any website) and no storage system can be guaranteed to be secure from intrusion, 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; and
- secure disposal.

### Access to personal information

An individual may ask for access to any personal information that the CCEB holds about said individual, subject to exceptions permitted by law.

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

If the CCEB denies a request for access to, or refuses a request to correct information, will provide an explanation.

### 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  
Centre 70  
Suite 705, 7015 Macleod Trail SW  
T2H 2K6 Calgary, Alberta  
Attention: Privacy Officer

### 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 Privacy Policy applies to all personal information of all individuals, unless the personal information is related to an individual who seeks to be, is or was employed by the CCEB. Such information is dealt with in the "CCEB Privacy of Employee Information Policy".

### Responsibility

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