



Corporate Privacy Policy

PROTECTION OF PERSONAL INFORMATION

Genome Canada is committed to the protection of all personal information collected and used by the organization in the management of its activities. Genome Canada adheres to the ten privacy principles contained within the Canadian Standards Association's *Model Code for the Protection of Personal Information*. Genome Canada also complies with the obligations to protect personal information as set out in the *Personal Information Protection and Electronic Documents Act* (PIPEDA) and other applicable laws.

For the purposes of this policy, personal information is any information about an identifiable individual, which includes any factual or subjective information about that individual. Excluded from this definition are the name, address, and professional contact information of an employee of an organization where such information is used solely for contact purposes.

PRIVACY PRINCIPLES

ACCOUNTABILITY FOR PERSONAL INFORMATION

Genome Canada is responsible for personal information in the organization's custody or control including where personal information is collected by or transferred to a third party for processing on the organization's behalf. Genome Canada has appointed a Privacy Officer and implemented policies and procedures to ensure that personal information is reasonably protected.

IDENTIFYING PURPOSES

Before Genome Canada collects any personal information, the organization will identify the purposes for its collection, use or disclosure and provide notice of these purposes to the individual. If Genome Canada plans to use or disclose personal information for a purpose not previously identified, the individual will be informed and further consent will be sought.

CONSENT

Except where permitted or required by law, Genome Canada will only collect personal information with the knowledge and consent of the individual. Genome Canada will use a form of consent (express or implied) that reflects the nature of the information being collected, taking into account its sensitivity and the expectations of the individual.

Individuals may withdraw their consent at any time to Genome Canada's continuing use or disclosure of personal information, subject to reasonable notice, contractual restrictions and / or Genome Canada legal and fiduciary obligations.

LIMITING COLLECTION

Genome Canada will only collect personal information that is necessary to fulfill purposes identified to the individual. All personal information will be collected by fair and lawful means.

Generally, personal information will be collected directly from the individual, but may on occasion be collected from other sources where the personal information is in the public domain, or where it is available from public bodies, government agencies and other third parties who represent that they have the right to disclose the information.

LIMITING USE, DISCLOSURE, AND RETENTION

Genome Canada will only use or disclose personal information for the purposes for which it was collected, unless an individual has otherwise consented or where the use or disclosure is permitted or required by law.

Personal information will be retained only as long as necessary for the fulfillment of identified purposes.

ACCURACY

Genome Canada will take reasonable steps to ensure that personal information collected by the organization or third parties on Genome Canada's behalf is as accurate, complete and up-to-date as necessary to fulfill its intended purposes. In particular, Genome Canada will take all reasonable steps to minimize the possibility of inappropriate or inaccurate personal information being used to make a decision about an individual.

At the same time, Genome Canada will not routinely update personal information and expects individuals who are concerned about the accuracy and completeness of their personal information to provide updated information as appropriate.

SAFEGUARDS

Genome Canada protects personal information using safeguards that are appropriate to the sensitivity of the information, taking into account the amount, distribution, format and intended uses. Safeguards include, but are not limited to the following:

- physical measures such as locked filing cabinets and restricted access to offices;
- organizational measures such as limiting access on a "need to know basis", and educating employees on the importance of maintaining the confidentiality of personal information;
- technological measures such as the use of computer passwords, secure data transmission, and data back-up and recovery procedures; and
- appropriate disposal of personal information to prevent access by unauthorized persons.

OPENNESS

Genome Canada will make readily available specific information about its policies and procedures relating to the management of personal information. This information includes:

- the title and address of Genome Canada's Privacy Officer;
- the means of gaining access to personal information held by Genome Canada;
- a description of the types of personal information held, including a general account of its use; and
- what personal information is made available to related organizations.

INDIVIDUAL ACCESS

Upon individual written request to the Privacy Officer, Genome Canada will identify if it possesses personal information about an individual and will provide access to that information.

In providing access, Genome Canada will indicate the source of the information, provide an account of how it is being used and provide an account of third parties to which the information may have been disclosed.

In limited and specific circumstances, as permitted or required by law, Genome Canada may not be able to provide some or all of the personal information being requested.

Individuals have a right to challenge the accuracy or completeness of personal information and to have it amended as required. Where a dispute about accuracy cannot be resolved, an individual may submit a short statement that will be appended to the file and transmitted to third parties to which the information has been disclosed, where appropriate.

All written access requests should be directed to:

Attention: The Privacy Officer

Genome Canada
150 Metcalfe Street, Suite 2100
Ottawa, Ontario K2P 1P1
Canada

CHALLENGING COMPLIANCE

Any questions or enquiries concerning compliance with the Genome Canada Policy on the Protection of Personal Information must be addressed in writing to the Privacy Officer at the address provided above.

This Policy is current as of the "last revised date" set out of the top of the Policy. Genome Canada will review the Policy at regular intervals to ensure that it remains relevant and current with applicable laws.