

CITC's Privacy Policy

The revisions to the Privacy Act, which will go into effect on January 1, 2004, require CITC to provide the following information to all our members.

Terms of Reference:

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as:

- ◆ Age, name, ID numbers, income, ethnic origin, or blood type
- ◆ Opinions, evaluations, comments, social status, or disciplinary actions
- ◆ Employee files, credit records, loan records, medical records, existence of a dispute between a consumer and a merchant, intentions (for example, to acquire goods or services, or change jobs)

Personal information does not include the name, title, business address or telephone number of an employee of an organization.

The Provisions of the Privacy Act require compliance in 10 areas: We have listed those areas below, as well as information on how CITC complies with each requirement.

1) Be accountable:

- CITC will comply with all 10 principles of the Privacy Act
- Steve Gillick, President and Chief Operating Officer, is responsible for CITC's compliance with the Act
- CITC will protect all personal information held by the Institute.
- CITC does not transfer information to third parties, nor have we ever made our membership lists available to third parties, either voluntarily or for sale. While CITC members benefit from the Institute's association with Corporate Partners and Industry sponsors, CITC is very up front with these parties in maintaining a policy of not providing membership information.
- In the case of sponsored events, such as specific seminars and conferences, CITC does allow the speaker(s) and sponsors access to the list of members attending, for the purpose of providing additional educational material, after the event has concluded. Members who wish that this information not be provided will have their information delisted.
- Other than for the express purpose of bringing business to our members, CITC does not divulge names or contact information for members.
- All Full Members in good standing (CTC/CTM) who are listed on the National Directory of Certified Travel Professionals, (The Directory), have given their permission to post their name and business contact information on the CITC website, and therefore, on the World Wide Web. Members are reminded on a regular basis to inform CITC if information on the Directory needs to be updated, corrected or removed.
- CITC makes every reasonable attempt to correct member information and keep both public records (those on the Directory) and private records (those in our database and in our paper back-up files) up to date.

- CITC has had occasion to destroy obsolete files over the years. In these cases, the services of a shredding company have been used, to ensure that personal membership information is destroyed, and not simply discarded.

What personal information do we collect?

Each membership file lists:

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| ▪ Name | ▪ Business Title/ Position |
| ▪ Designation | ▪ Dates on which pertinent information was sent |
| ▪ Membership Number | ▪ CITC sponsored seminars attended and ACCESS credits |
| ▪ Canada location code | ▪ Birthday (to send out Birthday cards) |
| ▪ Membership Category | ▪ Last fee paid |
| ▪ Preferred Language of correspondence | ▪ Paid fee date |
| ▪ Preferred place of correspondence | ▪ Method of Payment (we do not keep credit card records in our database--we only note whether payment was made by cash, cheque or credit card) |
| ▪ Home Contact information | ▪ Graduation Date (for student members) |
| ▪ Business Contact information | ▪ CITC events in which the member participated |
| | ▪ Date of membership upgrades |

2. Identify the Purpose

Why do we collect it?

We collect information to maintain correspondence with CITC members, past and present. We collect mailing information from consumers who have requested to be placed on mailing lists. The information allows us to contact individuals at the place of their choosing.

How do we collect it?

Generally, information is collected...

- Verbally--over the telephone, in person at CITC functions, and during office visits
- Electronically-via email
- Written-information via membership renewal forms, written correspondence and faxes

3. Obtain Consent

What is consent?

CITC considers consent to be an expression of permission to collect and use information for the purpose of providing membership services and benefits, or for the provision of consumer information.

We obtain consent by:

- Written permission via mail, email or fax
- Verbal permission with a dated notation in the member's file, along with the initials of the staff who recorded the information
- Third party consent, as long as the third party is well known to CITC and/ or is in a reasonable position to give such consent (eg. The Office manager correcting the information on an associate's file)

What do we use your personal information for?

To maintain the accuracy of membership records; to better communicate with our members; to establish member eligibility for membership services and benefits, to mail information to consumers who have specifically requested CITC information.

Where do we keep your personal information?

Information at CITC is kept :

- In the database, on the computer.
- Paper records are kept in file cabinets

How is your personal information secured?

CITC computers are backed up regularly, with back up tapes kept in the on-site safe. The office is secured in off-hours, and the building in which the office is located has strict off-hours security.

Who has access to your personal information, or uses it?

Only employees of CITC have access to membership records. When part time help is used for filing, all activities take place under the direct supervision of a CITC full time employee.

To whom is your personal information disclosed?

Information is used in the office and by CITC employees to service the membership. CITC does not disclose information without the express permission of CITC members. In cases that request immediate contact with a member, CITC will telephone or email the member before giving out any contact information.

When does CITC dispose of your personal information?

CITC disposes of obsolete membership files, usually those with whom we have had no correspondence for a period of 5 years. We use the services of a shredding company to dispose of all records that include personal information.

4. Limit Collection

In order to make our database as efficient as possible with regard to responding to membership inquiries, CITC maintains one "screen" for all membership information, as well as a second screen to record ACCESS approved events. Neither do we collect information that is extraneous to the efficient operation of the membership organization, nor do we collect information on behalf of third parties. The only instance where "other" information is collected is through regular industry surveys for the purpose of obtaining general industry trends. Surveys returned anonymously, as well as those that contain personal information (for instance if an incentive prize is involved for survey completion) are destroyed after the information is recorded.

5. Limit use, disclosure and retention

- CITC only collects information for the purpose of maintaining membership files, for the purpose of recording attendance at events (seminars, workshops, conferences), for the purpose of maintaining records with regard to the purchase of educational materials, texts, home study programs, courses and Certification programs, and for the purpose of attending and writing exams.
- CITC retains registration records for a period of three years; obsolete membership records are shredded every five years. Financial records are maintained for a period of 6 years.

6. Be Accurate

- CITC endeavours to keep membership records as up-to-date as possible, through regular communication with members via the CITC Latest Buzz (email newsletter), the Update (printed newsletter); Membership renewals (every October 31st or thereabouts); other mailed and emailed correspondence, including election notices, educational standards updates and targeted mailings (example, to travel & tourism educators and industry trainers).
- Personal information on individual members can be retrieved from the database by a CITC employee in order to verify the accuracy of the information, in consultation with a member. The National Directory of Certified Travel Professionals is an on-line listing of CTCs and CTMs in Canada. Full members in good standing are urged, several times a year, to check the currency of their listing.

7. Use Appropriate Safeguards

- CITC employees are made aware, verbally and in writing (The CITC Corporate Culture Document) of CITC's Privacy Policy with regard to compliance of the Privacy Act
- CITC's security policy regarding membership records includes:
 - **Physical measures:** The Downtown CITC office is situated in a security building where after-hours access is restricted to employees with a pass-card. The office itself has two deadbolts on the door.
 - The Brampton Office has a deadbolt on the main entrance doorway
 - **Technological Tools:** CITC computers are double password protected. All computer forms that relate to financial transactions are "secure". The CITC computer system is firewall protected.
 - **Organizational Controls:** CITC employees are vigilant with regard to the access of membership files. Staff training includes awareness of the provisions of the Privacy Act, as well as this policy document.

8. Be Open

- CITC has always made it known, and will continue to inform members, industry associates, sponsors and the public, of CITC's policies and practices for the management of personal information.
- CITC's Privacy Policy is available on the CITC website (www.citc.ca), as a main link, and also on the site index. Henceforth, in all membership renewal packages,

membership registration packages and, periodically throughout the year, CITC will ensure that due notice is made of the CITC Privacy Policy.

- Steve Gillick, the President and Chief Operating Officer is responsible for CITC's privacy policies and practices.
- While any full time employee is able to update membership information files, correspondence should be sent to the Membership Services Coordinator at 416-484-4450 Ext 21, 1-800-589-5776 Ext 21 or members@citc.ca. Registrants in ACCESS programs may directly contact the Education Standards Division to update personal information, at 905-940-5333 or access@citc.ca.
- Members may contact the sources listed above for a copy of the personal information in their files. Full members in good standing may also review and download information from the National Directory of Certified Travel Professionals at <http://www.citc.ca/certifiedcoun.cfm>
- Individuals can complain to CITC using the contact information listed above.

9. Give individuals access

- Individuals may visit the CITC office during regular office hours to review their membership records. They may also request a copy of the information CITC has in their file, as long as they satisfy verification of their identity.
- CITC will correct information in membership files on a timely basis, usually within 24 hours of notice.
- There are no costs or charges associated with the correcting of information in membership files
- CITC attempts to translate all abbreviations, short-forms and codes used in membership files. This information is readily available should a member be unable to decipher any aspect of their membership record.

10. Provide Recourse

- The easiest method of complaint about CITC's enforcement of Privacy policy and procedures is to communicate directly with the organization, via letter, fax, email or telephone. In most cases, complaints can be satisfied within 24 hours. Understandably, complaints that involve more than a simple correction or updating of information should be submitted in writing so that both the complainant and CITC have a paper trail to follow in accounting for the resolution of the complaint.
- Should an individual not be satisfied with the handling of a Privacy Policy complaint by a CITC employee, they should
 - Bring the complaint directly to the attention of the President and Chief Operating Officer.
 - If still not satisfied they should bring the complaint to the attention of the Chair of the Board of Directors
 - If still not satisfied they should bring the complaint to the attention of the Privacy Commissioner of Canada.