# PRIVACY



Ten interrelated principles form the basis of Compass Credit Union's Code for the Protection of Personal Information ("the Code"). Each principle must be read in conjunction with the accompanying commentary.

#### **OUR PRIVACY CODE**

The following is a summary of the 10 Principles of the Credit Union Code for the Protection of Personal Information.

#### **PRINCIPLE 1**

**Accountability** — Compass Credit Union is responsible for personal information under its control and shall designate an individual who is accountable for the credit union's compliance with the principles of the Code.

#### **PRINCIPLE 2**

**Identifying Purposes** — The purposes for which personal information is collected shall be identified by Compass Credit Union at or before the time the information is collected.

#### **PRINCIPLE 3**

**Meaningful Consent** — The knowledge and consent of the individual is required for the collection, use, or disclosure of personal information, except where inappropriate. Compass Credit Union is committed to providing individuals with the information they require to provide informed meaningful consent. You can withdraw your consent at any time. All requests to withdraw consent should be directed in writing to the Privacy Officer by mail or email to either of the addresses shown on the next page.

#### **PRINCIPLE 4**

**Limiting Collection** — The collection of personal information shall be limited to that which is necessary for the purposes identified by Compass Credit Union. Information shall be collected by fair and lawful means.

#### **PRINCIPLE 5**

**Limiting Use, Disclosure, and Retention** — Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

#### **PRINCIPLE 6**

**Accuracy** — Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

### PRINCIPLE 8

**PRINCIPLE 7** 

**Openness** — Compass Credit Union shall make readily available specific, understandable information about its policies and practices relating to the management of personal information.

**Safeguards** – Security safeguards appropriate to the sensitivity of the information shall protect personal information. Compass Credit Union will employ the same standard of care as it takes to safeguard its own confidential information of a similar nature.

#### **PRINCIPLE 9**

**Individual Access** — Upon request, an individual shall be informed of the existence, use, and disclosure of their personal information, and shall be given access to that information. An individual is entitled to challenge the accuracy and completeness of the information and have it amended as appropriate. All requests for personal information should be directed in writing to the Privacy Officer by mail or email to either of the addresses shown on this page. We take all requests for personal information seriously, and will acknowledge receipt within one business day. There are a limited number of situations where we are not permitted to disclose personal information. If we do not hold any of your personal information or are unable to disclose such, we will advise you within 30 days of the fact, along with the reason we are not able to provide the information. If we are holding your personal information, we will provide it to you within 30 business days. In the unlikely event we are unable to provide your personal information within 30 days, we will notify you in writing of your right to complain to the Office of the Privacy Commissioner. This notification will include contact information for the Privacy Commissioner.

#### **PRINCIPLE 10**

**Challenging Compliance** — Compass Credit Union has designated a Privacy Officer to address concerns regarding privacy and ensure that policy requirement and procedures are satisfied. All inquiries, concerns, or complaints regarding privacy should be directed in writing to the Privacy Officer by mail or email to either of the addresses shown on this page. We take all inquiries, concerns, and complaints seriously and will acknowledge receipt within one business day. In the unlikely event we are unable to come to a satisfactory resolution, Compass Credit Union's Privacy Officer will retain a record of your complaint and will notify you in writing of your right to complain to the Office of the Privacy Commissioner together with contact information for the Privacy Commissioner.

## **Compass Credit Union Privacy Officer**

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