

## **Privacy Policy for Grand River Carshare (formerly People's Car)**

**This Grand River CarShare (GRCS) Privacy Policy follows the ten principles of the Personal Information Protection and Electronic Documents Act. The Act balances a member's right to privacy of personal information with the need of the organization to collect, use, or disclose personal information for legitimate business purposes.**

### **1. Accountability**

The GRCS is responsible for protecting the personal information it collects for the purposes of providing car sharing services to its members.

GRCS Privacy Officer is:

Executive Director  
3-29 King St E  
Kitchener, ON N2G 2K4  
519-578-1895  
[info@grandrivercarshare.ca](mailto:info@grandrivercarshare.ca)

### **2. Identifying purposes**

The GRCS will only collect information that is necessary to:

- invoice members for services delivered by the GRCS;
- ensure that members meet the requirements of the GRCS's insurance policy;
- contact members to provide updates and information regarding services;
- determine usage patterns of GRCS vehicles to inform decisions on how to improve services and of where to locate future GRCS vehicles; and,
- use in case of member or vehicle emergencies.

### **3. Consent**

By signing the member application, and subsequently becoming a member, the person gives the GRCS explicit permission to use their personal information for the purposes identified in #2.

### **4. Limited Collection**

The GRCS will only collect information that is necessary to deliver services and information to members.

## **5. Limited use, disclosure and retention**

Members can expect that the GRCS will only use their personal information for the purposes outlined in #2, or as required by law. The Cooperative Corporations Act has provisions that allow members to have access to member contact info for the purpose of conducting Co-op business. Any other request for personal information by a third party will be referred back to the member for written permission. All personal information that is no longer needed for the purposes required will be shredded or electronically deleted.

## **6. Accuracy**

Members must inform the GRCS of any changes in their personal information, including their contact information and driving record. The GRCS will try to keep members' personal information as complete and accurate as is necessary and reasonably practical for delivering car sharing services.

## **7. Safeguards**

All written personal information regarding members is kept in a locked office. Security is further ensured by careful storage and password protection of electronic data.

The Internet is not a secure medium of communication. Therefore, the GRCS will not use e-mail or voice mail to communicate personal information. Members must give the GRCS permission to send their monthly invoices over the Internet.

## **8. Openness**

The GRCS will inform all members of this Privacy Policy and any changes that are made to it. Any questions about this policy should be directed to the GRCS's Privacy Officer.

## **9. Individual access**

Upon written request, the GRCS will inform members of the existence, use, and disclosure of their personal information, and give them access to it. Members may challenge the accuracy of the information and have it amended as appropriate.

## **10. Providing recourse**

Issues regarding compliance with the GRCS privacy policy should be addressed in writing to the GRCS's Privacy Officer. The Privacy Officer may delegate this responsibility to another GRCS staff or Director. A response will be given to the member within 30 days.