



# **Privacy Policy**

# 1.0 Policy

1.1 Ensuring the privacy and security of personal information is a top priority for the Métis Nation-Saskatchewan (MN-S). MN-S is committed to safeguarding and upholding the privacy of personal information in compliance with relevant privacy laws.

## 2.0 Scope

2.1 This policy pertains to all personal information collected by the MN-S.

## 3.0 Purpose

3.1 This Privacy Policy governs MN-S's practices regarding the privacy and security of all personal information under MN-S's possession and control. This includes personal information collected, used, or disclosed during MN-S's activities, such as information about our citizens and other stakeholders.

#### 4.0 Definitions / Terms

- 4.1 **Confidential Information** is data that is private or sensitive and is protected from unauthorized access or disclosure, including personal information collected by MN-S.
- 4.2 **Consent** is the explicit agreement given by an individual for their personal information to be collected, used, or disclosed, typically obtained through direct engagement or a formal agreement.
- 4.3 **Cookies** are small text files placed on a user's device by a website that can collect information about the user's online activity.
- 4.4 **Data Breach** is an incident where unauthorized access to, disclosure of, or loss of personal information occurs, potentially compromising the confidentiality or security of the data.
- 4.5 **De-identified Information** is data from which personal identifiers have been removed, making it impossible to trace the information back to the individual, used for statistical or research purposes.
- 4.6 **Historical Records** are records that are greater than 70 years old and/or available to the general public.



- 4.7 **Retention** is the period of time in which a record is maintained accessible and complete within the entity until the record reaches the end of its retention period when it gets disposed of.
- 4.8 **Third-Party Service Providers** are external organizations or individuals that perform services on behalf of the MN-S, such as IT support or data analytics, which may require access to confidential information.

# **Policy Requirements**

## 5.0 Purpose

- 5.1 The MN-S may collect personal information for the following purposes:
  - To administer the MN-S Citizenship Act and Constitution (the "Act")
  - To meet the objectives of the MN-S and the Act such as:
    - To trace family ancestry and compile and prepare genealogical charts, historical documents and reports
    - To use in public reports concerning contemporary or historical communities and traditional Métis customs and practices
    - o To gather historical records and data from archival collections
    - o To uphold Métis rights and entitlement and/or publicize Métis issues
    - To research and record personal information as necessary for the exercise and preservation of cultural practices and tradition
    - For administrative and MN-S governance matters and hearings and other purposes as may be required to advance the interests of Métis citizens within MN-S
    - To gathering non-identifying statistical information to assist in the development and delivery of program and services
    - For verification for participation or access to education, employment, and/or funding offered specifically for Métis people
    - For preparation of Métis Voters Lists and administration of elections in accordance with the MN-S Election Act.
  - To conduct health and other important research initiatives, funding applications, and other information sharing relationships with governments and others relating to MN-S and its citizens





- To collect and share the applicant's information such as the health services number from Saskatchewan Health Cards with the Government of Saskatchewan and others (such as Saskatchewan Cancer Agency, Saskatchewan Health Authority, Saskatchewan Health Quality Council, and Canadian Institute for Health Information (CIHI)), in order to obtain deidentified statistical information (e.g. health, harvesting, etc.) to assist in the development and delivery of programs and services for Métis Citizens
- To develop and provide MN-S programs and services and to conduct surveys relating to those programs and services
- To administer, plan, and manage the relationship with individuals and to communicate with individuals in relation to MN-S
- To comply with applicable legal and regulatory requirements or to protect MN-S's legal rights and property
- Where the MN-S has a legal duty or right to do so
- Where MN-S has a good faith belief that it is necessary to protect the property or rights of MN-S.
- 5.2 The type of information that MN-S may collect from individuals includes but is not limited to:
  - name
  - contact information
  - age
  - gender
  - identification
  - information relating to ancestry
  - historical information
  - Social Insurance Number (SIN)
  - banking information
  - other information required to meet service or program eligibility requirements
  - any other information individuals choose to provide
- 5.3 The MN-S is committed to protecting your privacy and will adhere to and abide by all applicable Canadian Federal and Provincial Privacy Laws.





## 6.0 Methods of Personal Information Collection

- 6.1 MN-S collects personal information about an individual with the individual's knowledge and consent directly from the individual to whom it relates, whether via:
  - MN-S's website
  - e-mail
  - telephone
  - fax
  - in person
  - mail
- 6.2 Occasionally, MN-S may collect personal information from third party sources, but only with the knowledge and consent of the individual or where otherwise authorized by law.

#### 7.0 Website and Cookies

- 7.1 Visitors to MN-S's website should also be aware that anonymous technical information may be collected by MN-S because of a visit to MN-S's website. For example, this information may include:
  - the visitor's IP address
  - browser type
  - operating system
  - domain name
  - access times
  - referring website addresses
  - etc.
- 7.2 MN-S uses this anonymous technical information for purposes such as:
  - diagnosing problems with MN-S's servers
  - improving the operation and content of MN-S's website
  - compiling aggregate and statistical information.
- 7.3 MN-S will not attempt to link or match such anonymous technical information with any personally identifiable information unless:





- MN-S has an individual's consent
- MN-S (or its service providers) have detected or reasonably suspect any unlawful use of MN-S's website or a security breach
- MN-S has a legal duty or right to do so
- 7.4 The MN-S may use "cookies" on its website.
- 7.5 Permanent cookies are stored indefinitely on a user's hard drive unless manually deleted, while temporary cookies are automatically deleted from the user's browser upon logging out of a website.
- 7.6 Web browsers typically allow users to disable permanent and/or temporary cookies.

## 8.0 Instances of Personal Information Use and Disclosure

- 8.1 The MN-S only uses or discloses personal information as reasonably required to facilitate the Authorized Purposes listed above.
- 8.2 In some cases, MN-S may share personal information with third party service providers performing functions on MN-S's behalf, including, for example, vendors that provide information technology services or provide analytics or assessment services.
- 8.3 The MN-S does not otherwise use or disclose personal information unless:
  - MN-S has an individual's consent
  - MN-S has a good faith belief that disclosure of the information is necessary to protect the rights or property of the Government.
  - MN-S has a legal duty or right to do so

## 9.0 Choice of Consent

9.1 Individuals provide their consent to the collection, use, and disclosure of personal information by MN-S when they provide their information to MN-S or otherwise engage with MN-S.





- 9.2 Individuals can deny or withdraw their consent to MN-S's collection, use and disclosure of their personal information at any time upon reasonable notice, subject to any legal or contractual requirements.
- 9.3 If consent is denied or withdrawn, MN-S may not be able to provide certain programs or services.

## 10.0 Protecting Personal Information

- 10.1 MN-S has in place reasonable policies, procedures and safeguards (including physical, technological and organizational measures) designed to protect the security of personal information under its control.
- 10.2 The protection of personal information is of paramount concern to MN-S, and MN-S is prepared to take appropriate and timely steps in the event of any incidents involving personal information in accordance with applicable privacy laws.
- 10.3 MN-S makes every reasonable effort to ensure that personal information is accurate and complete. This may involve requesting further information or updates from individuals.
- 10.4 MN-S relies on individuals to notify MN-S if there is a change to their personal information that may affect their relationship with MN-S.
- 10.5 MN-S retains personal information only as long as is reasonable to fulfill the purposes for which the information was collected, or for legal or business purposes.

## 11.0 Access to Personal Information

- 11.1 MN-S will provide individuals with access to the personal information MN-S holds about them in accordance with applicable laws.
- 11.2 MN-S reserves the right to require that any request for access to personal information be made in writing.
- 11.3 Generally, there is no cost for such access. However, MN-S reserves the right to charge such costs on a case-by-case basis in accordance with applicable laws. The individual will be notified in advance if charges apply.
- 11.4 MN-S will correct or amend the personal information in its files where it can be shown that the information is incorrect or incomplete.





# 12.0 Storage and Processing of Personal Information

- 12.1 MN-S will store the personal information on its internal servers, databases, and/or with its services providers for a specific time period as laid out in the MN-S General Records Management Policy.
- 12.2 In the event of a privacy breach, MN-S will undertake measures such as notifying affected individuals, investigating the breach, and taking corrective actions.

## 13.0 Authority

- 13.1 This policy is strictly enforced by the Chief Operating Officer (COO) & Chief Executive Officer (CEO) of MN-S or their delegated authority.
- 13.2 All employees, executives, and representatives must adhere to the guidelines outlined herein. Non-compliance may result in disciplinary action or withholding of reimbursement, as deemed appropriate by the Government.

## 14.0 Other Information

Freedom of Information and Protection of Privacy Act (FOIPP) The Privacy Act Local Authority Freedom of Information and Protection of Privacy Act (LA FOIP) Health Information Protection Act (HIPA) MN-S Citizenship Act and Constitution (the "Act") Personal Information Protection and Electronic Documents Act (PIPEDA) MN-S Records Management General Policy – In Progress
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