



1: Accountability

Analyze and document all personal information handling practices including ongoing activities and new initiatives. Here is a checklist to guide you:

- What personal information do we collect?
- Is it sensitive, and if so why?
- Why do we collect it?
- What do we use it for?
- Where do we keep it?
- How is it safeguarded?
- Who has access to it?
- Who is it disclosed to?
- When and how is it disposed of?

Develop, document and implement policies and procedures to protect personal information. Here is a checklist to guide you:

- Define the purpose for collection
- Obtain consent
- Limit collection, use and disclosure
- Ensure use and disclosure are consistent with purposes for which information was collected
- Ensure completeness and accuracy
- Ensure adequate security measures
- Develop a retention & destruction timetable and procedures
- Develop and implement policies and procedures to respond to access requests
- Develop and implement policies and procedures to respond to inquiries
- Develop and implement policies and procedures to respond to complaints
- Develop and implement policies and procedures to manage breach of privacy and security incidents
- Conduct risk assessments
- Develop, document and implement appropriate service provider management practices
- Develop, document and deliver appropriate privacy training for employees