

Privacy Policy

Effective Date: April 24, 2026

1. Purpose

- 1.1. This Privacy Policy (the “**Policy**”) describes how CAPE collects, uses, discloses, retains, and safeguards personal information in the course of carrying out its activities. The purpose of this Policy is to promote transparency, accountability, and responsible information-handling practices, and to affirm CAPE’s commitment to respecting the privacy of individuals whose personal information it holds.
- 1.2. As an organization which does not participate in commercial activity, CAPE is not subject to the federal *Personal Information Protection and Electronic Documents Act* (“**PIPEDA**”); however, in developing this Policy, CAPE has been guided by the fair information principles on which that legislation is based.

2. Application

- 2.1. This Policy applies to CAPE’s officers, employees, locals, committee members, and all other individuals and groups within CAPE that handle personal information.

3. Definitions

- 3.1. In this Policy,
 - a. “**aggregate information**” means information that has been aggregated or anonymized such that individuals cannot reasonably be identified;
 - b. “**personal information**” means information about an identifiable individual.

4. Collection, Use, and Disclosure of Personal Information

4.1. What Information CAPE Collects

- 4.1.1. CAPE collects:
 - a. personal information you provide directly to CAPE;
 - b. personal information automatically generated through your interactions with CAPE; and
 - c. personal information provided to CAPE by third parties, including your Employer.
- 4.1.2. CAPE maintains member records that may include personal information including contact information, demographic data, employment-related information, and/or other data collected in accordance with section 4.1.1 of this Policy. CAPE does not include sensitive personal information, such as personal health information, accommodations, grievance information, financial information, or other similar information of a sensitive nature in member records.

4.2. Use and Disclosure of Personal Information

4.2.1. CAPE may use and/or disclose your personal information as necessary to fulfil its legal obligations or to carry out its Constitutional objectives, which are identified at Article 3 of CAPE’s Constitution and include:

- a. Organizing and mobilizing the membership, including through mass-communications via email, regular mail, SMS, social media, or other channels, and/or targeted advertisements through third-parties service providers;
- b. Member representation in accordance with CAPE’s [Policy on Representation Services](#); and
- c. Collective bargaining.

4.2.2. CAPE may also use or disclose your personal information for any other purpose permitted by law or to which you consent.

4.2.3. Local Executives and members of Local Organizing Committees (“**LOCs**”) may be given limited access to aggregate and personal information for the fulfilment of their duties. Please refer to CAPE’s [Policy on the Use and Distribution of Member Information to Locals and Local Organizing Committees \(LOCs\)](#) for more information about how Locals and LOCs are permitted to use member information and CAPE-authorized digital tools.

4.3. Cookies

4.3.1. CAPE may use cookies, web beacons, and/or similar technologies on our website or other digital platforms to improve user experience, track analytics, measure performance, and support operations or functionality. By using CAPE’s website or other digital platforms, you consent to the use of cookies and similar technologies in accordance with this Policy.

4.4. Sharing Personal Information

4.4.1. CAPE may disclose personal information to its directors, officers, employees, representatives, agents, contractors, service providers, or other third parties where such disclosure is reasonably necessary to the fulfillment of CAPE’s Constitutional objectives or where required by law.

4.4.2. CAPE will make all reasonable efforts to ensure that third parties have appropriate policies and measures in place to protect personal information before providing personal information to them; however, once personal information has been disclosed to a third party, CAPE does not control and cannot guarantee the subsequent use, protection, or security of that information by the recipient.

4.4.3. CAPE does not sell, trade, or lease your personal information. We use the personal information we collect solely for the purposes described in this Policy, including to

provide and improve our services, communicate with you, and fulfill legal or operational requirements.

4.5. Privacy Principles

- 4.5.1. CAPE endeavours to use the least privacy-intrusive means available to achieve its Constitutional objectives or fulfill its legal obligations when collecting, using, or disclosing personal information. Subject to technological limitations, this includes, but is not limited to, the following:
- a. **Role-Based Access** – Individuals are granted access only to the specific personal information required to fulfill their specific duties, on a need-to-know basis.
 - b. **Aggregate vs personal information** – CAPE will prioritize aggregate information over personal information, unless reasonably necessary. Individuals are granted access to personal information only when aggregate information is insufficient to carry out the individual’s authorized task. Personal information will not be used over aggregate information strictly as a matter of convenience.
 - c. **Time-Limited Access** – Access to personal information is revoked when an individual’s role ends or upon completion of the task for which the individual was afforded access.
 - d. **Controlled Use** – Exporting, sharing, or storing personal information outside authorized systems is strictly prohibited, except as otherwise provided in this Policy.

5. Consent

- 5.1. Whenever practicable, CAPE will seek consent from individuals prior to the collection, use, and disclosure of their personal information.
- 5.2. Acceptance of the terms of this Policy will be taken to be consent to the collection, use, and disclosure described herein.
- 5.3. CAPE may not require consent to collect, use, or disclose personal information in the following circumstances:
 - a. To fulfill a legal obligation, such as CAPE’s duty of representation;
 - b. To protect the life, health, or safety of an individual;
 - c. To negotiate or administer a collective agreement; or
 - d. Where such personal information is provided by the Employer under a collective agreement negotiated by CAPE.
- 5.4. CAPE may, from time to time, post photographs or videos on social media of events it organizes or participates in, such as rallies, marches, protests and picket lines. By attending a CAPE event, consent to appear in published photographs or videos is

presumed, but any person can ask that photos of them not be posted publicly or be removed from social media posts.

- 5.5. Members may withdraw consent or opt out of receiving mass-communications from CAPE by clicking the “unsubscribe” link included in mass-communication emails or by writing to CAPE at membership@acep-cape.ca.

6. Safeguarding

6.1. Security Safeguards

- 6.1.1. The security of the personal information we collect is very important to us. As such, CAPE safeguards personal information through a combination of administrative, technological, and physical safeguards appropriate to the sensitivity of the information, including:

- a. Access controls and role-based permissions;
- b. Secure electronic systems and passwords;
- c. Confidentiality obligations for officers, employees, representatives, and others who handle personal information; and
- d. Secure storage and disposal practices.

- 6.1.2. No method of transmitting or storing information is completely secure. While we take reasonable steps to protect your personal information, there are inherent risks associated with providing information electronically, and we cannot guarantee absolute security. In some cases, data breaches cannot reasonably be anticipated or avoided. In the event of a data breach with the effect of personal information being compromised, CAPE will take reasonable steps to contain the breach, mitigate harm, and notify individuals whose personal information was compromised.

- 6.1.3. By using CAPE’s website or providing CAPE with personal information, you do so at your own risk and release CAPE of any responsibility and liability for a breach of security, including associated with the sharing of personal information with third parties.

6.2. Third-party links

- 6.2.1. Please note that any links to third-party websites on CAPE’s website are not bound by this Policy. Any such third-party sites have separate and independent privacy policies that may be different from our own. We take have no responsibility or liability for the content and activities of these linked sites. As such, if you wish to know more about their privacy policies, please visit their websites and review their privacy policies.

6.3. Retention and Destruction

- 6.3.1. CAPE may retain your personal information as long as necessary to fulfil the specific purpose for which the information was collected, CAPE's Constitutional objectives, or legal obligations.
- 6.3.2. Where records containing personal information are no longer required to be retained, CAPE will securely delete or destroy such records.

7. Access to Your Personal Information

- 7.1. For personal information that CAPE has collected about you, you can request that CAPE:
 - a. **Delete Data:** You can ask us to erase or delete all or some of your personal information.
 - b. **Modify or Correct Data:** You can ask us to change, update, or correct your personal information in certain cases, particularly if it is inaccurate.
 - c. **Limit or Restrict the Use of Personal Information:** You can ask us to stop using all or some of your personal information or to limit our use of it.
 - d. **Access Your Personal Information:** You can ask us for a copy of your personal information attached to your profile.
- 7.2. There may be some types of information CAPE is prohibited from providing, such as information about another individual that cannot be separated from the requesting individual's personal information, information that can identify another individual, or information which cannot be disclosed for legal reasons.
- 7.3. Requests relating to personal information should be made to CAPE's Privacy Officer and will be granted to the extent practicable, except where granting such requests would interfere with CAPE's ability to fulfil its duties or obligations, or as otherwise required by law.

8. Updates

- 8.1. CAPE may update this Policy periodically to reflect changes to our privacy practices or obligations. We will endeavour to notify CAPE members whenever this Policy receives a significant update.
- 8.2. We encourage you to regularly review this Policy to ensure you are familiar with any changes.

9. Administration

9.1. This Policy is administered by CAPE's Privacy Officer:

Privacy Officer

Matthew Ashworth

privacy@acep-cape.ca

9.2. Questions, concerns, or complaints about this Policy or about CAPE's collection, use, and disclosure of personal information may be directed to CAPE's Privacy Officer.