# **SLGA PRIVACY POLICY**

## 1. **PROTECTING PERSONAL INFORMATION**

The Saskatchewan Liquor and Gaming Authority (SLGA) is committed to protecting privacy and safeguarding personal information of any SLGA employee, customer or affiliate.

SLGA's privacy policy is designed to comply with *The Freedom of Information and Protection of Privacy Act*, and the government of Saskatchewan Privacy Framework.

## 2. WHAT IS PERSONAL INFORMATION

Personal information refers to any information about an identifiable person. If the information identifies an individual, is not publicly available and identifies something about that person, it is likely personal information.

According to the *Freedom of Information and Protection of Privacy Act (FOIPP)* personal information includes:

- Information that relates to the race, creed, religion, colour, sex, sexual orientation, family status or marital status, disability, age, nationality ancestry or place of origin of an individual.
- Educational background.
- Criminal or employment history.
- Financial transactions.
- An identifying number or symbol.
- The home or business address, home or business phone number.
- Fingerprints.
- Personal opinions and views of the individual, unless the opinions and views are about another individual.
- Private correspondence sent to a government institution by an individual and the replies to the correspondence that would reveal the content of the original correspondence.
- The views or opinions of another individual with respect to the individual.
- Tax return information, or information used for the purpose of collecting tax.

- Information that describes an individual's finances, assets, liabilities, net worth, bank balance, financial history or activities, or credit worthiness.
- The name of an individual where it appears with other personal information that relates to the individual, or where the name itself would reveal personal information about the individual.

However, it does not include:

- Information about the salary, expenses, job responsibilities or job classification of a person employed by or under contract with the government.
- An opinion expressed by a person about someone else is not personal information about the person who gave the opinion. It is personal information of the person who the opinion is expressed about.
- The detail of a license granted by the government.
- The amount of a grant or other discretionary payment made to a person by the government is not personal information about the person to whom the grant or benefit was paid.
- Expenses that the government paid for a person traveling at government expense.
- Information about a corporation is not personal information.
- Personal information which has had the identifying factors removed such that one can not identify the person whom it is about, is no longer personal information.

For the complete definition of personal information, please see *The Freedom of Information and Protection of Privacy Act*.

## 3. WHY SLGA COLLECTS PERSONAL INFORMATION

As the distributer of and sole licensing agent for the sale of beverage alcohol and as the provincial gaming regulator and operator of gaming programs, SLGA may collect personal information for the following reasons:

- Process permit applications and gaming licenses.
- Register gaming suppliers.
- Register gaming employees.
- Process a horse-racing license or registration.
- Process, verify and deliver orders.
- Verify the identity of an individual requesting information from SLGA.
- Comply with any legal and regulatory requirements.

Personal information may be collected in person, over the telephone, by mail, through the internet or on applications whether in writing, verbally or electonically.

## 4. SLGA PRIVACY PRINCIPLES

The following principles relate to the collection, use and disclosure of personal information by SLGA.

- 1. Accountability: SLGA is responsible for personal information under its control and has designated a Privacy Officer who is accountable for SLGA's compliance with the remaining principles.
- 2. Purpose: The purpose for which personal information is collected shall be identified by SLGA at or before the time the information is collected.
- 3. Consent: SLGA requires the knowledge and the written, verbal or implied consent of an individual for the collection, use and disclose of personal information, except where inappropriate or permitted by law.
- 4. Collection: The collection of personal information shall be limited to that which is necessary for the purpose identified by SLGA. Information shall only be collected by fair and lawful means.
- 5. Use and Disclosure: Personal information shall only be used or disclosed for the purposes for which it was collected, or for a use consistent with that purpose, except with the consent of the individual or as required by law.
- 6. Retention: SLGA shall retain personal information only so long as required by law or necessary for the fulfillment for which it was collected.
- 7. Accuracy: Personal information shall be as accurate, complete, and up-to-date as is reasonably possible and necessary for the purposes for which it was collected.
- 8. Safeguards: All personal information shall be protected by SLGA by using security safeguards appropriate to the sensitivity of the information.
- 9. Openness: SLGA will make readily available to individuals information about its policies and practices relating to the management of personal information.
- 10. Access: Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. He/she have the right to challenge SLGA with regard to the accuracy and completeness of the information and have it amended as appropriate.
- 11. Compliance: An individual shall be able to address a challenge concerning compliance with any of these principles to the Privacy Officer.

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## 5. Types of Information Collected

SLGA collects the following types of personal information.

- Full name including any names used in the past.
- Personal and business addresses.
- Email address.
- Personal, business and cell phone telephone numbers.
- Credit, criminal and gaming history.
- Information to verify an identity including sex, weight, height, eye colour, hair colour, date and place of birth, hospitalization number, social insurance number, immigration ID number, country of citizenship.
- Personal bank account information and credit card information.
- Relationship status including the date of marriage.
- Information to verify a spouce's or partner's identity including his or her name, sex, date and place of birth, business and personal phone numbers and email address.

Personal information can be collected from an application, supplied references, SLGA records, city police, credit reporting agencies, financial institutions and other service providers affiliated with SLGA.

#### 6. **RIGHTS OF INDIVIDUALS**

Supplying information to SLGA is a personal choice, so an individual may choose not to provide SLGA with their personal information. However, if personal information is not provided, SLGA may not be able to provide the product, service or information requested.

#### 7. INDIVIDUAL ACCESS AND CORRECTING PERSONAL INFORMATION

An individual who is not an SLGA employee and who wants to access or correct his/her own personal information must complete a <u>Request for Personal</u> <u>Information</u> or a <u>Request to Correct Personal Information</u> and send it to SLGA's Freedom of Information Coordinator. SLGA employees should contact the SLGA Human Resource Branch directly to access or correct personal information. Forms can be found on SLGA's website at <u>www.slga.gov.sk.ca</u>, or picked up from SLGA's head office.

## 8. SHARING INFORMATION

SLGA does not release individual personal information to any parties outside of SLGA, unless consent is obtained or SLGA is required or permitted by law.

SLGA will only disclose personal information in the following types of circumstances:

- Where the individual affected, or someone reasonably believed to be an agent acting on the individual's behalf, gives consent.
- Where the law requires or allows for the disclosure of such personal information without the consent of the individual affected.
- SLGA may disclose personal information if legally required to do so, or if necessary to comply with legal process served on SLGA to protect SLGA's rights or property, or take emergency action to protect the personal safety of the public.
- In providing services, SLGA may need to disclose personal information collected to affiliates and service providers who perform various functions for SLGA. However, they will be required to honor SLGA's privacy principles in the handling of personal information and to use the information disclosed only for the purposes for which it was collected.
- Personal information is not, without consent, used or disclosed to a third party for any purpose other than for which it was collected, or consistent with that purpose, unless its use or disclosure is required or allowed by law. This may include use or disclosure in order to protect, promote or defend the company's interest in civil proceedings, or in proceedings involving criminal activity, fraud or misrepresentation.

## 9. QUESTIONS AND CONCERNS

Questions concerning SLGA's Privacy Policy should be directed to SLGA's Privacy Officer, Vice President, Corporate Services Division; Director, Policy and Legislation; or the Freedom of Information Coordinator by emailing <u>inquiry@slga.gov.sk.ca</u> or through the contact information below:

#### **SLGA Privacy Officer**

Vice President Corporate Services Division P.O. Box 5054 2500 Victoria Ave Regina, SK S4P 3M3 Telephone: 306-787-2977 Facsimile: 306-787-8439

#### **Director, Policy and Legislation**

Corporate Services Division P.O. Box 5054 2500 Victoria Ave Regina, SK S4P 3M3 Telephone: 306-787-0589 Facsimile: 306-787-8439

#### Freedom of Information (FOI) Coordinator

Senior Policy Analyst Corporate Services Division P.O. Box 5054 2500 Victoria Ave Regina, SK S4P 3M3 Telephone: 306-787-1794 Facsimile: 306-787-8439

If you are unsatisfied with the decision of SLGA's Privacy Officer respecting the access to information, you may apply for a review of the matter with Saskatchewan's Information Privacy Commissioner.

#### Saskatchewan Information and Privacy Commissioner

503-1801 Hamilton Street Regina, SK S4P 4B4 Telephone: 306-787-8350 Toll Free Telephone (within Saskatchewan): 1-877-748-2298 Facsimile: 306-798-1603 Email: webmaster@oipc.sk.ca

## **10. HISTORY REVISIONS**

Previous version June 26, 2007; updated on January 5, 2015:

- Policy and Planning Division to Corporate Services Division
- Telephone numbers
- Logo
- Inquiry line email address added
- Section 10-History Revisions