



Abenaki Council of Odanak

PRIVACY POLICY

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Definitions

Except where the context suggests otherwise, the following terms and phrases are defined as follows:

Applicant	Any individual who acquires a goods or services provided by the Abenaki Council of Odanak.
Arrear	Outstanding balance, unpaid debt, or unfulfilled obligation.
Asset	Any item of value, tangible or not, that is the property of the Abenaki Council of Odanak.
Assignment	Statement of the objective and structure of a project, committee, meeting, or negotiation.
Budget	Plan or overview of expected cash inflows and outflows for a given period.
Call for Proposals	Competitive bidding process conducted by the Abenaki Council of Odanak to award a major services contract. The calls for proposals set out the terms, conditions and requirements determined by the Council and allow potential contractors to submit a proposal for services that outlines their experience, skills, and ability to successfully complete the contract within the specified costs and deadlines.
Capital Expenditure Plan	Consolidated plan or overview of cash inflows and outflows relating to all capital projects planned for a given fiscal year.
Capital Project	Construction, repair, or replacement of tangible capital assets belonging to the Abenaki Council of Odanak, as well as any other major capital project in which the Council or an entity related to the Council hold an interest.
Capital Project Plan	Management plan for the implementation of a capital project, including the budget.
Cash Flow	Cash or equivalent, cheques, money orders, and equivalent currencies.
Cash Reserves	Easily accessible funds to address short-term financial needs and emergencies.
Classification	Process of organizing documents into categories.
Committee	Group of individuals appointed by the Abenaki Council of Odanak to advise the elected officials or to carry out responsibilities assigned by the Council in relation to decision-making, until their resignation or the dissolution of the committee.



Compensation	Salaries, wages, commissions, bonuses, expenses, fees, and dividends, as well as any other monetary and non-monetary benefits.
Conflict of Interest	Situation leading to personal gain at the expense of others.
Contract	A legally binding agreement between two parties.
Control	Policy, procedure, or process implemented to manage the Abenaki Council of Odanak's administration.
Corrective Measures	Actions taken in relation to work behavior that does not meet communicated and agreed-upon performance expectations.
Cost	Amount of money to be paid or spent to obtain something.
Criteria for Recognizing a Fixed Asset	Threshold used to determine when a tangible asset must be recorded in the tangible fixed asset register.
Debt	What is owed to others, usually a sum of money.
Delegation of Authority	Transfer of powers or duties from one individual to another, where the first (the "delegator") bears responsibility for the proper fulfillment of duties.
Delegation of Authority Chart	Table approved by the Abenaki Council of Odanak detailing delegations of authority for certain decisions or activities related to the financial administration of the Council.
Direct Supervisor	Employee responsible for managing and supervising the work and development of other employees.
Document	Information created, received, and recorded by the Abenaki Council of Odanak for operational purposes or to comply with a legal obligation. A document may exist in electronic or paper format.
Eligibility Criteria	Requirements established by the Abenaki Council of Odanak that must be met by an individual in order to be considered independent and eligible to serve on the Finance and Audit Committee.
Entity	Company, partnership, joint venture, association, or unincorporated organization whose financial transactions are consolidated in the financial statements of the Abenaki Council of Odanak, in accordance with GAAP.
Exclusive Supplier	Agreement awarded by the Odanak Abenaki Council without using a competitive process for the purchase of goods or services.
Executive	General manager, financial manager, tax administrator, and any other Abenaki Council of Odanak employee designated as such by the elected officials.



Expense	Amount of money spent by the Abenaki Council of Odanak to purchase goods or services.
Fee	Expenses incurred for transportation, lodging, meals, hospitality, and incidental expenses that are reimbursable.
Finance Director	Individual responsible for the day-to-day financial management of the Abenaki Council of Odanak.
Financial Proficiency	Ability to read and understand the financial statements of the Abenaki Council of Odanak.
Financial Reporting Risk	Significant potential for error in financial information, generally caused by inadequate internal safeguards or fraud.
Financial Statement	Official document detailing all sums of money and all property belonging to the Abenaki Council of Odanak for a given period.
First Nation Council	Elected or appointed official representatives of the Abenaki First Nation of Odanak, including the Chief of the Abenaki Council of Odanak and the Council members, as well as equivalent designations used by the Abenaki of Odanak.
Fiscal Year	A twelve-month period used for tax or accounting purposes.
Fraud	A wrongful or criminal act involving lying or withholding information, usually for personal or financial gain.
GAAP	Accounting principles commonly recognized in Canada, i.e., the framework of accounting rules, procedures, and guidelines.
General Manager	Individual reporting directly to the Abenaki Council of Odanak, responsible for overseeing the administration or day-to-day operations of the Council.
Human Resources Files	Files containing information about a person's employment, duties, compensation, performance, and work history.
Indemnity	Security or protection against loss or other financial obligation.
Independence	Eligibility criteria for membership on the Finance and Audit Committee whereby a person must not have a direct or indirect financial relationship with the Abenaki Council of Odanak that the Council could reasonably expect to compromise their independence of judgment as a member of the Finance and Audit Committee. A person involved in the financial management of the Abenaki Council of Odanak regarding the planning, organization, management or control of financial activities—budgeting, financial accounting, financial reporting,



procurement, use of funds—does not meet the minimum independence criteria to serve on the Finance and Audit Committee.

Information	Information received and documented material, regardless of source or format.
Integrated Planning and Budgeting Process	Annual process of planning and budgeting activities at all levels of the Abenaki Council of Odanak government, which are interconnected and coordinated with each other, and which are grounded in the elected officials' vision and strategic objectives.
Internal Assessment	Review of an activity or process by an independent Abenaki Council of Odanak staff member (i.e., a person who is not involved in or responsible for the activity being evaluated) to determine its effectiveness.
Investment	Purchase of an asset or item in order to increase its value or generate income in the future.
IT Security	Way in which the Abenaki Council of Odanak protects information from unauthorized access, use, alteration, or deletion.
Lifecycle Management Program	Plan of costs related to the purchase, use, maintenance, and disposal of tangible fixed assets for a given period.
Loan Guarantee	Commitment to pay all or part of the principal or interest on a debt in the event of default by the borrower.
Organizational Chart	Visual representation of the various positions within the Abenaki Council of Odanak, clearly showing the hierarchical relationships (i.e., who reports to whom).
Personal information	Any information related to a physical person which could lead to identifying said person. As such, any information about a specific individual, in addition to the usual details, such as name, gender, physical characteristics, address, contact details, and identification and file numbers, this information also includes criminal, medical, financial, family, and academic history, as well as evaluative information and other details about the individual's private life.
Privacy Protection	Rules established by the Abenaki Council of Odanak for collecting, creating, using, sharing or disclosing, retaining, protecting, and disposing of personal information necessary for the administration of the Council.
Projection	Estimate regarding a future situation based on all available information at the time it is made.
Purchase	Purchase of an asset or item; the Financial Management Board of the Abenaki of Odanak standards refer to this as "procurement."



Purchase Order	A document stating a buyer's intention to purchase something from a seller and showing the details of what the buyer wishes to purchase.
Record Keeping	Way in which the organization creates, obtains, and manages its documents.
Replacement	Substitution, in whole or in part, by another asset, tangible or not, of the Abenaki Council of Odanak.
Payment Request	Form used by the Abenaki Council of Odanak to record expenses.
Resource Optimization	The optimal balance of price, quality, and benefits for a product or service.
Risk	Possibility of loss or other negative events that could threaten the achievement of the Abenaki Council of Odanak's objectives.
Significance Threshold	Financial amount, usually high, that the Abenaki Council of Odanak considers significant; the threshold of significance is the minimum amount that the Council considers significant.
Special Committee	Committee formed for a specific purpose and dissolved once the objective has been achieved.
Standing Committee	Committee dedicated to an ongoing objective.
Statement on the Code of Conduct	Statement that the Abenaki Council of Odanak, members of committees, employees and contractors must sign this once a year to confirm that they understand the Code of Conduct of the Abenaki Council of Odanak and agree to comply with it.
Tangible Fixed Asset	Tangible fixed assets (physical assets) such as buildings, land, and major equipment.
Tax Administrator	When the Abenaki of Odanak collect local revenues, this person is in charge of the day-to-day management of local revenues and the local revenue account.
Travel Authorization	Official travel on behalf of the Abenaki Council of Odanak, pre-approved by a person's direct supervisor; travel authorization runs from the person's place of work to their destination, up to the person returns to their place of work. If the place of departure or return is different from the place of work and this location is closer to the destination than the place of work, this location should be considered the place of departure and return.
Useful Life	Estimated period during which the Abenaki Council of Odanak will be able to use a tangible capital asset; the lifespan of a tangible capital asset may extend beyond its useful life, and the lifespan of a tangible capital asset, other than land, is a (limited) fixed period.



Virtual Private Network A virtual private network, or VPN, is a way of using public telecommunications infrastructure, such as the Internet, to provide secure remote access to the virtual network of the Abenaki Council of Odanak.



Mission

The mission of the Abenaki Council of Odanak is to represent the members of the Abenaki community of Odanak and to promote the preservation of their identity, culture, and quality of life.

To this end, the Council aims to provide first-rate services to young people, elders, and the entire community, to the extent of the band's resources.

The Council is committed to transparency and fairness in its decision-making, while supporting individual and collective prosperity and autonomy to ensure the future of the band.

This policy reflects the Council's commitment to information security and to the protection of personal and confidential information.



1 Goal of the Policy

The Abenaki Council of Odanak is a public body subject to, among other things, the *Privacy Act*—R.S.C. (1985), c. P-21 and the *Personal Information Protection and Electronic Documents Act* (PIPEDA). In addition, this policy is related to the Policies and Procedures for Information Management and the Policies and Procedures for Governance under the Abenaki Council of Odanak Financial Administration Act.

The Privacy Policy defines how the Council protects personal or confidential information and outlines standards for the collection, use, disclosure, retention, access, and correction of such information. It also defines the role and composition of the Abenaki Council of Odanak's Access to Information and Privacy Committee.

This policy applies to Abenaki Council of Odanak members, Finance and Audit Committee members, Council executives and employees, and any subcontractors or volunteers working on behalf of the council. The guidelines contained in this policy apply to all personal information created or acquired by the Abenaki Council of Odanak, regardless of format (i.e., both paper and electronic).

2 Policy Directions

2.1 Protection of personal and confidential information

The Abenaki Council of Odanak considers the protection of privacy and of the personal and confidential information it collects and stores to be of paramount importance. It is committed to complying with the provisions, values, and fundamental principles established by applicable legislation. The Council takes all necessary measures to ensure transparency and confidentiality with regard to the information provided to it in order to obtain the desired services.

2.2 Information Security

The Abenaki Council of Odanak is committed to implementing a set of technological, organizational, human, legal, and ethical measures to ensure information security, including:

- The availability of information so that it is accessible in a timely manner and in the manner required by authorized persons.
- The integrity of information so that it is not destroyed or altered in any way without authorization and in compliance with the Council's retention schedule, and that the medium on which this information is stored provides the desired stability and durability.
- The confidentiality of information by limiting disclosure to authorized persons only.
- The identification and authentication to confirm, when required, the identity of a person or the identification of a document or device.



- Irrevocability to ensure that an action, exchange, or document is undeniable and clearly attributed to the entity that generated it.
- Compliance with the legal, regulatory, or business requirements to which the Council is subject.

3 Definitions

3.1 Personal Information

Any information that relates to an individual and allows them to be identified, except as otherwise provided by applicable laws. This information may be personal in nature, such as address, phone number, health status, lifestyle habits, or financial situation.

3.2 Confidential Information

Any information concerning a building or a legal entity whose author or owner considers confidential, whether financial, commercial, or strategic in nature, unless applicable public sector laws provide for an exception whereby such information held by the Abenaki Council of Odanak becomes public.

3.3 Information Security

Protection afforded by all security measures implemented to ensure the confidentiality, integrity, and availability of information held by the Abenaki Council of Odanak, based on the sensitivity and value of that information, the risks to which it is exposed, and the obligations to which it is bound.



4 Consent, Collection, and Retention of Personal and Confidential Information

4.1 Consent and Method of Collection

The Abenaki Council of Odanak collects information with complete transparency and with the user's free and informed consent, and only in cases where the information collected is necessary to provide the desired service.

In compliance with applicable laws, when collecting personal and confidential information, the Council clearly states the purposes for which it is being collected and requests the user's consent to use it. The Council must obtain further consent prior to using information already collected for other purposes.

Some Council services or activities may be intended for minors. In such cases, personal information is collected with the consent of the child's parents or guardian. Information is collected through forms, websites, telephone interviews, opinion polls, or surveys.

4.2 Collected Information

Depending on the service provided, the Abenaki Council of Odanak may collect and store any of the following information: last name, first name, mailing address, email address, phone numbers, fax number, credit card number, Indian status card number, hunter's license number, student ID number, driver's license number, social security number, health insurance number, and date of birth.

4.3 Collection of technical information when the website or online services are used

The Abenaki Council of Odanak collects technical information such as IP addresses, pages visited and queries, date and time of connection, type of Internet browser or computer system used, or the domain name of the website from which the link to caodanak.com was established.

In addition, when using online services or visiting the caodanak.com website, the Council or its agent may store certain information on the user's computer in the form of a cookie or similar file. Cookies allow certain information about the usage of the website or of an online service to be stored. By targeting the interests and preferences of the Internet user, cookies therefore allow the Council to improve its service delivery and customer experience. A cookie may be required due to technological or security constraints inherent to Internet browsing or to the proper functioning of an online service.

Most Internet browsers allow you to delete cookies from your hard drive, block them, or receive a warning before they are installed on your computer. Users who refuse cookies will still have access to the site, but their browsing experience may be affected and certain services may be unavailable.



4.4 Purpose of Information Collection

When the Abenaki Council of Odanak collects and stores personal and confidential information, its goal is to provide users with a personalized and secure service that is compliant with applicable laws and its security regulations.

The Council will therefore use the personal, confidential, or technical information it collects for the following purposes:

- Verify the user's identity.
- Protect users and the Council against fraud and false statements.
- Provide tailored services.
- Assess eligibility for Council services.
- Track service requests to the Council and its agents.
- Share updates on current services and programs with members who have opted in.
- Generate statistics.
- Improve the services offered.

5 Right to Rectification, Withdrawal, and Destruction

A member of Odanak may request that their personal information be corrected, destroyed, or no longer used for the purposes for which it was collected. To do so, they are invited to contact the relevant department.

In accordance with the Privacy Act—R.S.C. (1985), c. P-21, the Personal Information Protection and Electronic Documents Act (PIPEDA), the retention schedule, and the Abenaki Council of Odanak's classification plan, information is stored for a predetermined period and then destroyed.

In accordance with applicable laws, the Council is committed to complying with all requests for removal, correction, and destruction, unless otherwise required by law.

Duplicates of personal information must be securely destroyed in accordance with applicable destruction procedures to limit the risk of unauthorized disclosure or access.



6 IT Security

The Abenaki Council of Odanak makes extensive use of information technology to support its business processes in order to provide services in accordance with its service declaration. All personal and confidential information is stored in a secure environment. Staff and their agents are required to uphold the confidentiality of information.

The Council implements security and access management measures that are appropriate, useful, and necessary, based on the sensitivity of the information being processed. Access to information is restricted to individuals who are required to have it in order to perform their duties.

The Council incorporates technological innovations to ensure the confidentiality, integrity, and availability of transactions and information across its various service delivery channels.

7 Roles and Responsibilities of the CAO

The Abenaki Council of Odanak is responsible for all personal information collected, stored, used, disclosed, and destroyed in the course of carrying out its mission. The Council will continue developing policies and best practices to ensure that members' personal information is handled in strict compliance with the Privacy Act.

In addition, the Council must ensure that the privacy policy is reviewed and updated at least once every three years—or more frequently if necessary—to reflect legislative and technological developments.

The Abenaki Council of Odanak's general manager is responsible for monitoring the application of these policies and practices to ensure compliance, including:

- Providing all Council staff with the same training.
- Ensuring open, complete, and timely communication with employees and others about Council policies, practices, and expectations regarding the handling of personal information.
- Ensuring that the Access to Information and Privacy Committee is functional.
- Establishing standards for classifying the sensitivity of personal information so that the appropriate level of protection can be determined.
 - o Collaborating with the Council's digital information security specialist to ensure that sensitive data, such as personal information, is properly protected from potential risks, including theft, unauthorized access, misuse, disclosure, or damage. This is achieved by implementing measures that limit access to this data to only those employees whose job responsibilities necessitate it.
 - o requiring contracts or other arrangements with third parties to include special provisions mandating compliance with the Privacy Act, this policy, and internal procedures.
- Ensuring that procedures are put in place so that members can request access to their personal information, ask for corrections to be made, and file complaints about how their personal information is managed.



- Making sure that procedures are in place to notify members of any inappropriate collection, retention, use, disclosure, or destruction of their personal information.
- Monitoring compliance with this policy and, where necessary, taking steps to correct any deficiencies.

Employees — Staff members who collect personal information on behalf of the Abenaki Council of Odanak must explain the purpose for which the information is being obtained. If they are unable to do so, they must refer the member to another employee who can explain the reason for the collection. Each Council employee is responsible for educating themselves about their obligations under this policy and the Privacy Act. Employees must report any violation of the Policy or the Act to their direct supervisor or Council general director. Employees are strictly prohibited from sharing personal information with any third party without the express consent of the affected individual.

Managers — In addition to the above responsibilities, managers must inform their employees of their obligation to comply with the Policy and the Act. They must also review or investigate any issues brought to their attention regarding the Policy or the Act. When necessary, directors must notify the Assistant General Manager—Human Resources Manager or the Abenaki Council of Odanak’s digital information security officer, work with them, or escalate certain issues to them.

General Manager — The Abenaki Council of Odanak’s General Manager will provide advice and guidance to directors and employees regarding the Council’s handling of personal information. They will also serve as the primary point of contact for individuals seeking information about or who have concerns regarding the Council’s handling of their personal information.

Any violation of this policy, whether intentional or through negligence, may result in disciplinary action, up to and including dismissal or termination of association with the Council.

Legal action may also be taken, should it prove necessary.



8 Responsibilities of Odanak members

1. Members are responsible for the information they submit to the Abenaki Council of Odanak and for maintaining the confidentiality of their identification and authentication information (user code, access code, password, access card, etc.). The Council cannot be held responsible for unauthorized use caused by members.
2. Members must ensure that the system or equipment they use to send or receive information to or from the Council is sufficiently secure. They must also exercise caution through the whole process. The Council cannot be held responsible for unauthorized access to information resulting from negligence or vulnerabilities in the member's equipment or system.
3. If their information becomes compromised or their identity is stolen, members are required to contact the relevant department as soon as possible to notify the Council.
4. The Council will not contact members by email or other means to request personal or confidential information about them.

9 Committee on Access to Information and Protection of Personal Information

9.1 Role of the Committee

The committee provides leadership and contributes to promoting an organizational culture that fosters transparency and stronger privacy protection. It:

- Supports the Abenaki Council of Odanak in exercising its responsibilities and fulfilling its obligations.
- Defines and approves guidelines for privacy protection.
- Approves governance rules.
- Provides advice and suggests protective measures for any project involving the acquisition, development, or redesign of IT systems, including video surveillance and the introduction of new technology.
- Plans and ensures the delivery of training activities.
- Promotes the Commission d'accès à l'information's principles, guidelines, and decisions.
- Conducts an annual assessment of privacy protection levels.

9.2 Composition

- Abenaki Council of Odanak General Manager
- Council Assistant General Manager—Human Resources Manager
- Council Digital Information Security Officer
- As needed, any additional expertise required (internal or external)



10 Restrictions on Access to Services

The Abenaki Council of Odanak reserves the right to terminate a user's account at any time, at its sole discretion and without notice. The Council also reserves the right to restrict a user's access to all or part of the applications offered by the Council. The Council shall not be held liable for any such suspension, cancellation, or restriction.

11 Incident Notification

The Abenaki Council of Odanak is committed to informing members in the event of a privacy-related incident.

12 Link to Other Websites

The Abenaki Council of Odanak website provides hyperlinks to other sites. The information exchanged on these sites is not subject to this privacy and security policy, but to that of the external site.

The Council is not responsible for the content of these sites and does not endorse them. The Council cannot be held liable for damage of any kind resulting from browsing and using these sites.

13 Policy Enforcer

The Abenaki Council of Odanak's general manager is responsible for ensuring compliance with the policy's personal and confidential information protection component.

The Council's digital information security officer is responsible for ensuring compliance with the policy's digital information security component.

14 For More Information, Comments or Complaints

For questions, comments, or complaints about this policy or its application, members may contact the relevant department of the Abenaki Council of Odanak.

Members who are not satisfied with the response they receive may contact the Council's General Manager in writing:

Conseil des Abénakis d'Odanak
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