

**006****DIRECTIVE ON  
PROTECTING PERSONAL FINANCIAL INFORMATION**

*The Government collects, uses, and records data and information as part of its work to serve Nunavummiut. The Government has obligations related to these activities, including to protect personal information. The Government has procedures, policies, regulations, and laws to guide how to meet these obligations.*

*This directive provides additional direction and guidance on how the Government should manage personal financial information.*

**1.0 POLICY STATEMENT**

- 1.1 The Government values and relies on detailed, accurate, and timely financial information to inform decisions, support operations, and serve Nunavummiut. The Government manages financial information with diligence, respect, and accountability, and will fulfill its obligations to protect personal financial information.

**2.0 DIRECTIVE**

- 2.1 Employees shall collect, use, disclose, store, and otherwise manage personal financial information in a way that is consistent with the provisions of this directive, the *Access to Information and Protection of Privacy Act*, and other applicable policies and procedures.
- 2.2 The Comptroller General shall consider every opportunity to protect personal information when establishing the form and content of financial records, systems, and related procedures.
- 2.3 The Comptroller General shall contribute, by action and decision, to supporting the Government's wider approach to identifying, reducing, and monitoring privacy risks, especially those related to the collection and use of personal financial information.

**3.0 EFFECTIVE DATE**

- 3.1 This directive takes effect June 1, 2023.
- 3.2 This directive replaces the following instruments:
- FAM Directive 606: Protection of Personal Financial Information (September 2009)

**4.0 AUTHORITIES AND DELEGATIONS**

- 4.1 This directive is issued under the authorities of sections 5, 11, and 12 of the [Financial Administration Act \(FAA\)](#).
- 4.2 This directive supports the *Access to Information and Protection of Privacy Act*, which obliges the Government to take reasonable measures to protect personal information.

- 4.3 The Board has delegated to the Comptroller General the authority to issue, amend, and rescind procedures, standards, bulletins, forms, and other policy tools related to this directive.

## 5.0 OBJECTIVES

- 5.1 The objective of this directive is to:
- 5.1.1 Recognize that the Government collects, uses, and stores financial information to legitimately deliver services to Nunavummiut.
  - 5.1.2 Recognize that the Government has obligations in respect of information, and especially to protect personal financial information.
  - 5.1.3 Provide focused guidance in respect of managing information of a financial nature, within the Government's broader approach towards protection of privacy, access to information, and information management.

## 6.0 IMPORTANT TERMS

- 6.1 The [Access to Information and Protection of Privacy \(ATIPP\) Act](#) defines *personal information* as information about an identifiable individual, and provides several examples (e.g. name, address, phone number, ethnicity, age, sex, etc.).
- 6.2 For this directive, in the context of the Government's financial systems, procedures, and records, *personal financial information* relates to or describes an identifiable individual's financial affairs or status.
- Examples include but are not limited to: social insurance number (SIN), payroll information, banking information, credit standing, transaction details, debts owing, or similar financial information related to an identifiable individual.
- 6.3 Personal information can be considered *sensitive* if its collection, use, or disclosure creates or increases risks to the individual. The Board encourages the Government to treat personal financial information as sensitive and to establish procedures that promote privacy and uses consistent with the purposes of collection.

## 7.0 PROVISIONS

### *Legal Framework*

- 7.1 The [Financial Administration Act](#) assigns to the Comptroller General the duty to:
- 7.1.1 establish the form and content of financial records and accounting systems for the Government and
  - 7.1.2 establish and maintain systems and procedures related to properly controlling, authorizing, and managing public money and property.
- 7.2 The [Access to Information and Protection of Privacy \(ATIPP\) Act](#) promotes public accountability and protects personal privacy by requiring the Government to:
- 7.2.1 Respect the rights of the public to access records the Government holds with some exceptions, and

- 7.2.2 Protect personal privacy while collecting, using, and disclosing personal information.

#### *Roles*

- 7.3 Within this framework, and in the context of financial administration and management, the Comptroller General shall:
  - 7.3.1 Foster conditions that encourage departments and public agencies to support rights of access and the protection of privacy relating to financial information.
  - 7.3.2 Design and implement systems and procedures to help protect personal financial information.
  - 7.3.3 Consider opportunities to address and improve privacy considerations when establishing the form and content of financial records, systems, and procedures.
- 7.4 Deputy Heads of each department and public agency are responsible for:
  - 7.4.1 Fostering conditions within their department or public agency to support rights of access and the protection of privacy relating to financial information.
  - 7.4.2 Ensuring their department or public agency assess, in line with s. 42.1 of the ATIPP Act, the privacy impacts of new or revised initiatives, programs, and services that involve personal financial information.
  - 7.4.3 Ensuring their department or public agency designs and implements systems and procedures to help protect sensitive personal financial information.
  - 7.4.4 Reviewing all new programs or activities their department or public agency undertakes to ensure sensitive personal financial information is managed in accordance with procedures the Comptroller General establishes, this directive, and all other applicable legislation, regulations, policies.
  - 7.4.5 Ensuring their department or public agency appropriately monitors programs and activities to ensure sensitive personal financial information remains properly safeguarded.

#### *Collection and Acquisition*

- 7.5 Departments and public agencies may directly collect or indirectly acquire the personal financial information they reasonably need to perform legitimate work duties in service to Nunavummiut (provide goods and services, procure supplies, meet regulatory responsibilities, operate efficiently, offer options of convenience, etc.).
- 7.6 Departments and public agencies are not to collect or acquire personal financial information for any other purpose.
- 7.7 When collecting or acquiring sensitive personal financial information departments and agencies should seek informed consent.
- 7.8 The Government shall not refuse service to an individual that refuses to provide personal financial information, unless the information is essential to the provision of that service.

### *Storage and Retention*

- 7.9 The storage and retention of financial records is subject to applicable policies and procedures established by Government, as well as to applicable rules established under relevant legislation (e.g. rules set by the Public Records Committee under the *Archives Act*).
- 7.10 Generally, departments and public agencies should store physical (“hard copy”) records containing personal financial information in a location or container that appropriately protects against unauthorized access and complies with applicable information management requirements.
- Common locations could include in lockable or restricted offices or storage rooms within buildings, in lockable filing cabinets or drawers, etc.
- 7.11 Generally, departments and public agencies should store digital records containing personal financial information using technologies and methods that appropriately protect against unauthorized access and complies with applicable information management requirements.
- 7.12 Departments are encouraged to review and/or audit information storage systems (physical and digital) from time to time to ensure collection integrity, identify risks, and consider opportunities for improvement.
- 7.13 On occasions where the Government moves data from one electronic system to another, the Government shall approach its migration and conversion decisions in a way that reduces privacy risks and supports wider information management objectives, such as protecting the authenticity, integrity, accessibility and reliability of information within the system.

### *Use and Access*

- 7.14 Departments and public agencies may use personal financial information for the purpose for which it was collected, or for limited other uses as permitted by the ATIPP Act.
- 7.15 Departments and public agencies may use personal financial information for other purposes with the informed consent of the individual to whom the information pertains.
- 7.16 The Government shall take steps to restrict or limit access to personal financial information to public officers who require the information to conduct the activities for which the information was collected.
- Common methods of restricting access including permissions / roles, authentication and encryption technologies (e.g. passwords), limiting access by location (e.g. geofencing), and limiting access by time (e.g. session time-outs).

### *Disclosure*

- 7.17 Third party requests for information that would include personal financial information must be processed by the public body’s recognized ATIPP authority in accordance with the ATIPP Act.

- 7.18 The person from whom the personal financial information is collected must have reasonable access to the information retained by the Government and the opportunity to request justified changes.

#### *Disposal and Archiving*

- 7.19 The Government shall dispose of financial information in a manner consistent with wider government policies and standards related to records management.

#### *Third-party Service Providers*

- 7.20 The Government may use third-party service providers to process, store, and otherwise manage financial information, including sensitive personal financial information.
- 7.21 The Government shall ensure third-party service providers take appropriate steps to protect this information, in line with ATIPP requirements and other policies or standards established by Government. The department responsible for engaging the third-party service provider is also responsible for obtaining reasonable assurance that the third-party provider has the systems and safeguards in place to protect the data from being misused.
- 7.22 Third-party service providers engaged by the Government must ensure personal financial information is processed and stored within Canada, except with the express written permission of the Government. The department engaging the third-party provider will work with the Department of Justice to ensure other appropriate requirements are part of the service contract.
- 7.23 Deputy Heads are responsible for ensuring due diligence with respect to engaging third-party service providers. Due diligence includes, but is not limited to, ensuring contracts contain appropriate protections for personal information.

## **8.0 APPLICATION**

- 8.1 This directive applies to all departments within the Government of Nunavut, and to any agency that uses the Government's core financial information system.
- 8.2 Public agencies, including territorial corporations, are responsible for meeting their own obligations under ATIPP, and are encouraged to develop their own policies for managing and protecting personal financial information. Agencies without explicit policies are encouraged to follow the intent and provisions of this directive.

## **9.0 REFERENCES AND RESOURCES**

- 9.1 Legislation and Regulations
- [Access to Information and Protection of Privacy Act](#)
  - [Financial Administration Act](#)
  - [Archives Act](#)

## 9.2 Related Instruments

- Government Policy on Records Management

## 9.3 Other resources

- [Office of the Information and Privacy Commissioner of Nunavut](#)

## 9.4 Enquiries

- 9.4.1 If you have questions relating to access to information or the protection of privacy, please contact:

Your department's ATIPP coordinator

OR

Territorial ATIPP Manager  
Department of Executive and Intergovernmental Affairs  
Government of Nunavut

- 9.4.2 If you have questions relating to document retention policies, archives, or information management generally please contact:

Records Management  
IM/IT Branch  
Department of Community and Government Services  
Government of Nunavut