

**SIDNEY COMMUNITY ASSOCIATION  
PERSONAL INFORMATION PROTECTION POLICY**

This Personal Information Protection Policy, in compliance with the British Columbia *Personal Information Protection Act* (PIPA) outlines the principles and practices we will follow in protecting our members' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality and security of our members' personal information and allowing our members' to request access to, and correction of, their personal information.

We will inform our members' of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

**Policy 1 – Collecting Personal Information**

- 1.1 Unless the purposes for collecting personal information are obvious and the member voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
  
- 1.2 We will collect member information that is necessary to fulfill the following purposes:
  - To verify identity,
  - To identify member preferences,
  - To deliver requested information and services,
  - To send our association membership information,
  - To contact our members for fundraising,
  - To collect and process membership fees,
  - To meet regulatory requirements.

**Policy 2 – Consent**

- 2.1 We will obtain member consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
  
- 2.2 Consent can be provided orally, in writing, electronically or it can be implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the member voluntarily provides information for that purpose.

- 2.3 Consent may also be implied where a member is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, fundraising and the member does not opt-out.
- 2.4 We may collect, use or disclose personal information without the member's knowledge or consent in the following limited circumstances:
- When the collection, use or disclosure of personal information is permitted or required by law,
  - When the personal information is available from a public source (e.g. a telephone directory),
  - When we require legal advice from a lawyer,
  - For the purposes of collecting a debt,
  - To protect ourselves from fraud,
  - To investigate an anticipated breach of an agreement or a contravention of law.

### **Policy 3 – Using and Disclosing Personal Information**

- 3.1 We will only use or disclose member personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as:
- To conduct member surveys in order to enhance the provision of our activities,
  - To contact our members directly about activities, events and services that may be of interest to them.
- 3.2 We will not use or disclose member personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell member lists or personal information to other parties.

### **Policy 4 – Retaining Personal Information**

- 4.1 If we use member personal information to make a decision that directly affects the member, we will retain that personal information for at least one year so that the member has a reasonable opportunity to request access to it.
- 4.2 Subject to Policy 4.1, we will retain member personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

### **Policy 5 – Ensuring Accuracy of Personal Information**

- 5.1 We will make reasonable efforts to ensure that member personal information is accurate and complete where it may be used to make a decision about the member or disclosed to another organization.
- 5.2 Members may request correction of their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year.

### **Policy 6 – Securing Personal Information**

- 6.1 We are committed to ensuring the security of member personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 The following security measures will be followed to ensure the member personal information is appropriately protected:
  - Restricting access to personal information as appropriate (i.e., only those Board of Directors that need to know and have been authorized will have access,
  - The use of user ID's and passwords.
- 6.3 We will use appropriate security measures when destroying members' personal information such as:
  - Shredding printed documents,
  - Deleting electronically stored information.
- 6.4 We will continually review and update our security practices and controls as technology changes to ensure ongoing personal information security.

### **Policy 7 – Providing Members Access to Personal Information**

- 7.1 Members have a right to access their personal information, subject to limited exceptions. (i.e. solicitor-client privilege).
- 7.2 A request to access information must be made in writing and provide sufficient detail to identify the personal information being sought.
- 7.3 Upon request, we will also tell members how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 We will make the requested information available within 30 business days.

### **Policy 8 – Questions and Complaints: The Role of the Privacy Officer or Designated Individual**

- 8.1 The Privacy Officer or designated individual is responsible for ensuring Sidney Community Association's compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Members should direct any complaints, concerns or questions regarding Sidney Community Association's compliance in writing to the Privacy Officer or designated individual. If the Privacy Officer or designated individual is unable to resolve the concern, the member may also write to the Information and Privacy Commissioner of British Columbia.

#### Sidney Community Association's Privacy Officer:

Kathleen McMullin

Email: [vicepresident@sidneycommunityassociation.com](mailto:vicepresident@sidneycommunityassociation.com)

Telephone: 250-655-9568