

BC MAID FAMILY SUPPORT SOCIETY

Personal Information Protection Policy

At BC MAID FAMILY SUPPORT SOCIETY (the “Society”), we are committed to providing the public with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our visitors and donors, protecting their personal information is one of our highest priorities.

While we have always respected our visitors and donors privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia’s *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our visitors and donors 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.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting our visitors’ and donors’ personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our visitors’ and donors’ personal information and allowing our visitors and donors to request access to, and correction of, their personal information.

Scope of this Policy

This Personal Information Protection Policy applies to the Society and any of its subsidiaries or related affiliates. This policy also applies to any service providers collecting, using or disclosing personal information on behalf of the Society.

Personal Information –means information about an identifiable individual, examples including name, home address, phone number, whether an individual has donated to the Society previously, and amounts of previous donations, but Personal Information does not include contact information (described below).

Contact information – means information that would enable an individual to be contacted at a place of business or publicly available information, and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.

Privacy Officer – means the individual designated responsibility for ensuring that the Society complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the visitor or donor 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 may collect information from you from information that you provide to us, via interactions with you, or information we obtain from third-party sources.

Policy 2 – Consent

- 2.1 We will obtain visitor or donor 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, or via a third party in similar fashion, or it can be implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the visitor or donor voluntarily provides personal information for that purpose.

- 2.3 Consent may also be implied where a visitor or donor is given notice and a reasonable opportunity to opt-out of his or her personal information being used for newsletters, mail-outs, informational updates, or fundraising and the visitor or donor does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), visitors or donors can withhold or withdraw their consent for the Society to use their personal information in certain ways. A visitor's or donor's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the visitor or donor in making the decision.
- 2.5 We may collect, use or disclose personal information without the visitor or donor's knowledge or consent in the following limited circumstances:

When the collection, use or disclosure of personal information is permitted or required by law;

In an emergency that threatens an individual's life, health, or personal security;

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 visitor or donor personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes.
- 3.2 We will not use or disclose visitor or donor personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell visitor or donor lists or personal information to other parties unless we have consent to do so.

Policy 4 – Retaining Personal Information

- 4.1 If we use visitor or donor personal information to make a decision that directly affects the visitor or donor we will retain that personal information for at least one year so that the visitor or donor has a reasonable opportunity to request access to it.

- 4.2 Subject to policy 4.1, we will retain visitor or donor 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 visitor or donor personal information is accurate and complete where it may be used to make a decision about the visitor or donor or disclosed to another organization.
- 5.2 Visitors or donors may request correction to 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. If the correction is not made, we will note the visitors' or donors' correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of visitor and donor personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 Personal information will be protected with such security safeguards as are appropriate for the level of security of the information obtained.
- 6.3 We will use appropriate security measures when destroying visitors' or donors' personal information.
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Access to Personal Information

- 7.1 Visitors and donors have a right to access and verify their personal information, subject to limited exceptions including solicitor-client privilege, or where disclosure may reveal personal information about another individual, health or safety concerns.
- 7.2 A request to access personal 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 visitors or donors 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, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the visitor or donor of the cost and request further direction from the visitor or donor on whether or not we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify the visitor or donor in writing, providing the reasons for refusal and the recourse available to the visitor or donor.

Policy 8 – Compliance

- 8.1 The Privacy Officer is responsible for ensuring the Society’s compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Visitors and donors should direct any inquiries regarding the Society’s compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the visitor or donor may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for the Society’s Privacy Officer:

Signy Novak

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