



Personal Information Protection Policy

Approved – July 4, 2022

Table of Contents

INTRODUCTION TO THE PRIVACY POLICY	2
DEFINITIONS USED IN THIS POLICY	2
POLICY 1 - COLLECTING PERSONAL INFORMATION	2
POLICY 2 – CONSENT.....	3
POLICY 3 - USING AND DISCLOSING PERSONAL INFORMATION	3
POLICY 4 – RETAINING PERSONAL INFORMATION	4
POLICY 5 – ENSURING ACCURACY OF PERSONAL INFORMATION	4
POLICY 6 – SECURING PERSONAL INFORMATION	4
POLICY 7 – PROVIDING ACCESS TO PERSONAL INFORMATION	4
POLICY 8 – QUESTIONS AND COMPLAINTS: THE ROLE OF THE PRIVACY OFFICER	5
POLICY VERSION CONTROL.....	5
FURTHER INFORMATION ABOUT PRIVACY REQUIREMENTS	5

Introduction to the Privacy Policy

BCPS Employees for Freedom (BCPSEF) is committed to providing our members with lawful service. As providing this service involves the collection, use and disclosure of some personal information protecting their personal information is a high priority.

This policy is enacted because of British Columbia's *Personal Information Protection Act* or PIPA. PIPA came into effect on January 1, 2004, and establishes rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

With this policy, 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.

This policy, referred to as the Personal Information Protection Policy, and in compliance with PIPA, outlines the principles and practices we will follow in protecting the personal information of members.

Definitions Used in This Policy

- **Personal Information:** means information about an identifiable individual. Personal information does not include contact information.
- **Contact Information:** means information that would enable an individual to be contacted at a place of business and includes name, position name of title, business phone number, business address, business email or business fax number. Contact information is NOT covered by this policy or PIPA.

Policy 1 - Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and a 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 only collect member information that is necessary to manage the affairs of the Society and fulfill the following purposes:
 - a. To verify identity
 - b. To communicate with members
 - c. To identify member communication preferences
 - d. To collect and process member fees and other payments
 - e. To deliver requested services, if applicable
 - f. To ensure the orderly management of the Society
 - g. To meet regulatory requirements

Examples of personal information that could be collected include:

- a. Name
- b. Email
- c. Phone number(s)

Personal information does NOT include 'contact information' which is information that enables an individual to be contacted at a place of business.

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 by filling in a form supplied by the Society, or it can be implied where the purpose for collecting, using or disclosing personal information would be considered obvious and the member voluntarily provides personal 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 email notices and the member does not opt out.

2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service, or the withdrawal of consent would frustrate the performance of a legal obligation), members can withhold or withdraw their consent for the Society to use their personal information in certain ways. A member's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or document. If so, we will explain the situation to assist the member in making the decision.

2.5 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 phone directory).

Policy 3 - Using and Disclosing Personal Information

3.1 We will only use or disclose member personal information when necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes, such as:

- To contact our members directly about information, meetings and activities that may be of interest.

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 lists of personal information to other parties.

3.4 In general and unless members are notified otherwise, personal information will be available only to Society executive members and to our legal counsel to fulfill the Society's business.

Policy 4 – Retaining Personal Information

4.1 If we use a member’s personal information in a manner 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 information only as long as necessary to fulfill the identified purposes or a legal or business purpose, and as required any applicable legislation.

Policy 5 – Ensuring Accuracy of Personal Information

5.1 We will make reasonable efforts to ensure that member personal information is accurate and complete.

5.2 Members may request correction to their personal information to ensure its accuracy and completeness by contacting the Society at admin@bcpsforfreedom.com.

Policy 6 – Securing Personal Information

6.1 We are committed to ensuring the security of member personal information 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 that owner and resident personal information is appropriately protected:

- The use of user ID and passwords for the Society’s email accounts and electronic storage;
- Restricting access to personal information as appropriate so that only those who need it have access to it.

6.3 We will use appropriate security measures when destroying members’ personal information such as shredding documents and deleting electronically stored 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 Members have a right to access their personal information, subject to limited exceptions. Exceptions to access include solicitor-client privilege or disclosure would reveal personal information about another individual.

7.2 A request to access personal information must be made in writing by contacting the Society at admin@bcpsforfreedom.com.

7.3 Upon request, we will tell members how we use their personal information and to whom it has been disclosed if applicable.

7.4 Except as otherwise provided for in relevant legislation, we will make the requested information available within 30 business days or provide written notice of an extension when additional time is required to fulfill the request.

7.5 Except as otherwise provided for in relevant legislation, a minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the member of the cost and request further direction from the requestor on whether we should proceed with the request.

7.6 If a request is refused in full or in part, we will notify the member in writing, providing the reasons for refusal and the recourse available to the requestor.

Policy 8 – Questions and Complaints: The Role of the Privacy Officer

8.1 The Society will appoint a Privacy Officer who is responsible for overseeing our Society’s compliance with this policy and the Personal Information Protection Act (PIPA).

Policy Version Control

- July 4, 2022 | BCPSEF Society Privacy Policy | Board Approved

Further Information about Privacy Requirements

- **BC Office of the Information and Privacy Commissioner**
947 Fort Street, Victoria, BC V8V 3K3 | **Telephone:** (250) 387-5629 | **Hours:** Mon-Fri 8:30am-4:30pm
E-mail: info@oipc.bc.ca | Website: <https://www.oipc.bc.ca/>
- **Personal Information Protection Act**
http://www.bclaws.ca/Recon/document/ID/freeside/00_03063_01