

**Personal Information Protection
Private Sector Privacy Legislation
Personal Information Protection Policy**

**Shuswap Recreation Society
Personal Information Protection Policy**

At Shuswap Recreation Society, we are committed to providing our patrons, customers, members, and guests with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our patrons, customers, members and guests, protecting their personal information is one of our highest priorities.

While we have always respected our patrons', customers', members' and guests' 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 patrons, customers, members and guests 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 patrons', customers', members' and guests' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our patrons', customers', members' and guests' personal information and allowing our patrons, customers, members and guests to request access to, and correction of, their personal information.

Scope of this Policy

This Personal Information Protection Policy applies to Shuswap Recreation Society and any service providers collecting, using or disclosing personal information on behalf of Shuswap Recreation Society.

Definitions

Personal Information – means information about an identifiable *individual including but not limited to the following:*

- *First and last names;*
- *Mailing address including postal codes;*
- *Telephone number;*
- *E-mail address;*

For registered Programs the following additional information may be collected:

- Date of birth;
- Pre-requisite skills or certification;
- Emergency contact information;
- Activity related health information including:
 - Medical conditions;
 - Medications;
 - Allergies;
 - Physician approvals;

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 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 Shuswap Recreation 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 patron, customer, member, guest 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 patron, customer, member, guest information that is necessary to fulfill the following purposes:
 - To verify identity we may collect name, home address, telephone number, e-mail address and birth date;
 - To identify patron, customer, member, guest preferences;
 - To understand the facility and service needs of our patrons, customers, members and guests;
 - To open and manage a membership account;
 - To deliver requested products and services;

- To enrol the client in a program;
- To send out membership information;
- To ensure a high standard of service to our patrons, customers, members and guests;
- To meet regulatory requirements;
- To verify creditworthiness;
- To assess suitability for tenancy;
- To collect and process rent payments;

Policy 2 – Consent

- 2.1 We will obtain patron, customer, member, guest 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, through an authorized representative or guardian or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the patron, customer, member, guest voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a patron, customer, member, guest is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products and the patron, customer, member, guest 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), patrons, customers, members and guests can withhold or withdraw their consent for Shuswap Recreation Society to use their personal information in certain ways. A patron's, customer's, member's, guest'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 patron, customer, member, guest in making the decision.
- 2.5 We may collect, use or disclose personal information without the client's, customer's, member's, guests' 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;
 - For the purposes of payment of a debt;
 - To protect ourselves from fraud;
 - To investigate an anticipated breach of an agreement or a contravention of law
 - The information is collected by observation at an event that is open to the public;
 - The disclosure is for the purpose of contacting next of kin or friend of an injured or ill individual;

Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only use or disclose patron, customer, member, guest 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 patron, customer, member, guest surveys in order to enhance the provision of our services;
 - To contact our patrons, customers, members and guests directly about products and services that may be of interest;
- 3.2 We will not use or disclose patron, customer, member, guest personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell patron, customer, member, guest lists or personal information to other parties.

Policy 4 – Retaining Personal Information

- 4.1 If we use patron, customer, member, guest personal information to make a decision that directly affects the patron, customer, member, guest, we will retain that personal information for at least one year so that the patron, customer, member, guest has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain patron, customer, member, guest 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 patron, customer, member, guest personal information is accurate and complete where it may be used to make a decision about the patron, customer, member, guest or disclosed to another organization.
- 5.2 Patrons, customers, members and guests 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 patrons', customers', members' correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of patron, customer, member, guest 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 that patron, customer, member, guest personal information is appropriately protected:
- Locked offices;
 - Locked filing cabinets;
 - The use of individual IDs and passwords for computers and individual software programs;
 - Various electronic safety measures including firewalls, restricted employee access to personal information on an as needed basis;

- 6.3 We will use appropriate security measures when destroying patron's, customer's, member's guest's personal information such as shredding documents manually or through the use of shredding services, deletion of electronically stored information and the physical destruction of electronic storage devices.
- 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 Patrons, Customers, Members and Guests Access to Personal Information

- 7.1 Patrons, customers, members and guests have a right to access their personal information, subject to limited exceptions as follows:
- The disclosure of the information would reveal confidential commercial information that if disclosed, could, in the opinion of a reasonable person, harm the competitive position of the Shuswap Recreation Society;
 - The information was collected or disclosed without consent, as allowed under PIPA for the purposes of an investigation and the investigation and associated proceedings and appeals have not been completed;
 - The disclosure could reasonably be expected to threaten the safety or physical or mental health of an individual other than the individual who made the request;
 - The disclosure can reasonably be expected to cause immediate or grave harm to the safety or to the physical or mental health of the individual who made the request;
 - The disclosure would reveal personal information about another individual;
 - The disclosure would reveal the identity of an individual who has provided personal information about another individual and the individual providing the personal information does not consent to disclosure of his or her identity;
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought and should be forwarded to the Privacy Officer.
- 7.3 Upon request, we will also tell patrons, customers, members and guests 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 patron, customer, member, guest of the cost and request further direction from the patron, customer, member, guest 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 patron, customer, member, guest in writing, providing the reasons for refusal and the recourse available to the patron, customer, member, guest.

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

- 8.1 The Privacy Officer, is responsible for ensuring Shuswap Recreation Society's compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Patrons, customers, members and guests should direct any complaints, concerns or questions regarding Shuswap Recreation Society's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the patron, customer, member, guest may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Shuswap Recreation Society's Privacy Officer, at privacy@salmonarmrecreation.ca