

## **Personal Information Protection Policy**

At **Cowichan Lake Arts and Culture Society, (CLACS)** we are committed to providing our members with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our members, protecting their personal information is one of our highest priorities.

While we have always respected our members' 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 clients, customers, 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 Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting 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.

### **Definitions**

*Personal Information* – means information about an identifiable individual , such as name, age, home address and phone number. Personal information does not include contact information (described below).

*Contact information* – means information that would enable an individual to be contacted and includes name, telephone number, address, or email. Contact information is not covered by this policy or PIPA.

*Privacy Officer* – means the individual designated responsible for ensuring that CLACS complies with this policy and PIPA.

### **Policy 1 – Collecting Personal Information**

1.1 Unless the purposes for collecting personal information are obvious and the member voluntarily provides his, her, or their, 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.

- I.2 We will only collect member information that is necessary to fulfill the following purposes: To deliver requested products and services, i.e.: membership in CLACS; registration for workshops, classes, or events; to send out association membership information; newsletters.

## **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 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 mail-outs, the marketing of new services or products, or when member does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product), members can withhold or withdraw their consent for CLACS 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 product.
- 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; 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.

## **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 conduct member surveys in order to enhance the provision of our services; to contact our members directly about products and services 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 member lists or personal information to other parties unless we have consent to do so.

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

- 4.1 If we use members' personal information to make a decision that directly affects the member, we will retain that personal information for internal use only; 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

#### **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 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. A request to correct personal information should be forwarded to the Privacy Officer.
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required.

#### **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 that member personal information is appropriately protected: the use of locked filing cabinets; physically securing offices where personal information is held; the use of user IDs, passwords, encryption, firewalls; restricting employee access to personal information as appropriate.
- 6.3 We will use appropriate security measures when destroying member's 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 Members Access to Personal Information**

- 7.1 Members have a right to access their personal information, subject to limited exceptions. Some examples include when disclosure would reveal personal information about another individual
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. This request should be forwarded to the Privacy Officer
- 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, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 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 member.

### **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 CLACS' compliance with this policy and the Personal Information Protection Act.
- 8.2 Members should direct any complaints, concerns or questions regarding CLACS' compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the member may also write to the Information and Privacy Commissioner of British Columbia.

#### **Contact information for CLACS' Privacy Officer**

Cowichan Lake Arts and Culture Society  
Attn: Kathie Fielding  
PO Box 805  
Lake Cowichan, BC V0R2G0