

Personal Information Protection Policy

Falaise Community Association

The Falaise Community Association (FCA) is a volunteer organization that works to enhance the quality of life of its residents. Meeting our objectives involves the collection, use and disclosure of some personal information about our members and 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 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. This includes name, street address, phone number and email address. Our membership policy requires that members be eighteen years of age or older. If there is doubt when an individual applies for membership, we may ask for proof of age, but this information will not be recorded in our database.

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

Register of Members – Our Register of Members, for the purpose of the B.C. Societies Act, contains only names and street addresses.

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 only collect member information that is necessary to fulfill the following purposes:
 - To ensure eligibility to be a member of the FCA. For this purpose, name and home address are required;
 - To send out information, notices and newsletters relating to the FCA and its activities. For this purpose, an email address is required.

Policy 2 – Consent

- 2.1 We will obtain member consent to collect, use or disclose personal information.
- 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 FCA notifications and the member does not opt-out.
- 2.4 Members can withhold or withdraw their consent for the FCA to use their personal information in certain ways. For example, they may choose not to receive emails from the FCA.

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.
- 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 provide member lists or personal information to other parties except when required by court order, search warrant or as directed by section 25 of the B.C. Societies Act.

Policy 4 – Retaining Personal Information

- 4.1 The Societies Act requires us to keep Association records for ten years. Membership records older than ten years will be destroyed.

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 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.

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: only those with need to know will have access; computer files and web sites will be protected by passwords.
- 6.3 We will use appropriate security measures when destroying member's personal information such as shredding documents and deleting electronic files.
- 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.
- 7.2 A request to access personal information must be made in writing to the Privacy Officer 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.
- 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.

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

- 8.1 The President of the FCA shall serve as the Privacy Officer.
- 8.2 The Privacy Officer is responsible for ensuring the compliance of the FCA with this policy and the *Personal Information Protection Act*.
- 8.2 Members should direct any complaints, concerns or questions 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 the Privacy Officer of the FCA:

President of the FCA, president@falaise.ca

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