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# PERSONAL INFORMATION PROTECTION POLICY

## ***Policy #13***

***Date: June 28, 2021***

***Revised: November 20, 2023***

### **Purpose**

At SIFPS, we are committed to providing members and volunteers (collectively referred to as a “Direct Stakeholder”) with exceptional service. As providing this service involves the collection, use and disclosure of some personal information, protecting personal information is one of our highest priorities.

While we have always respected Direct Stakeholder 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 a Direct Stakeholder 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 personal information and allowing a Direct Stakeholder to request access to, and correction of, their personal information.

### **Definitions**

***Personal Information*** – means information about an identifiable such as name, home address, telephone number, email address, and S.I. number (for those who may receive compensation). 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 with the responsibility for ensuring that SIFPS complies with this policy and PIPA.

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

1.1 Unless the purposes for collecting personal information are obvious and the Direct Stakeholder 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 personal information that is necessary to fulfill the following purposes:

- To comply with the requirements of the Society Act,
- To accept the member’s application to become a member of SIFPS,
- To send out SIFPS membership information (e.g. Notices of Meetings)
- To pay compensation to a Direct Stakeholder

### **Policy 2 – Consent**

2.1 We will obtain customer 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 in writing, electronically or it can be implied when 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 Direct Stakeholder is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail outs and the Direct Stakeholder 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), a Direct Stakeholder can withhold or withdraw their consent for SIFPS to use their personal information in certain ways. A Direct Stakeholder’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 a Direct Stakeholder in making the decision.

2.5 We may collect, use or disclose personal information without the Direct Stakeholder’s knowledge or consent in the following limited circumstances:

- When the personal information is available from a public source (e.g. a telephone directory)

- 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 we require legal advice from a lawyer.

### **Policy 3 – Using and Disclosing Personal Information**

3.1 We will only use or disclose a Direct Stakeholder's personal information where necessary to fulfill the purposes identified at the time of collection:

- To comply with the requirements of the Society Act,
- To accept the member's application to become a member of SIFPS,
- To send out SIFPS membership information (e.g. Notices of Meetings)
- To comply with the Canada Revenue Agency's tax requirements

3.2 We will not use or disclose a Direct Stakeholder's 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.

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

4.1 If we use a Direct Stakeholder's personal information to make a decision that directly affects the Direct Stakeholder then we will retain that personal information for at least one year so that the Direct Stakeholder has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, we will retain a Direct Stakeholder's 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 a Direct Stakeholder's 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 A Direct Stakeholder may request corrections 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 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 a Direct Stakeholder's correction request in the file.

#### **Policy 6 – Securing Personal Information**

6.1 We are committed to ensuring the security of a Direct Stakeholder's 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 a Direct Stakeholder's personal information is appropriately protected:

- The use of locked filing cabinets,
- Physically securing offices where personal information is held,
- The use of user ID's passwords, encryption, firewalls,
- Restricting access to personal information as appropriate (e.g. only those who need to know will have access.)

6.3 We will use appropriate security measures when destroying a Direct Stakeholder's personal information such as:

- Deleting electronically stored information,
- Shredding documents.

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 Direct Stakeholder Access to Personal Information**

7.1 A Direct Stakeholder has a right to access their personal information, subject to limited exceptions.

- Solicitor – client privilege,
- Disclosure would reveal personal information about another individual,
- Health and 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. A request to access personal information should be forwarded to the Privacy Officer of SIFPS.

7.3 Upon request, we will also tell a Direct Stakeholder 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 Direct Stakeholder of the cost and request further direction 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 Direct Stakeholder in writing, providing the reasons for refusal and the recourse available to the Direct Stakeholder.

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

8.1 The Privacy Officer is responsible for ensuring SIFPS's compliance with this policy and the Personal Information Protection Act.

8.2 A Direct Stakeholder should direct any complaints, concerns or questions regarding SIFPS's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the Direct Stakeholder may also write to the Information and Privacy Commissioner of British Columbia.

Contact information:

SIFPS's Privacy Officer - Corporate Secretary of the Board

Saturna Island Fire Protection Society

Box 168

Saturna Island, BC V0N 2Y0