

Courtenay and District Fish & Game Protective Association Personal Information Protection Policy

At Courtenay and District Fish & Game Protective Association (CDFGPA), we are committed to providing our members, employees and guests with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our members, employees and guests, protecting their personal information is one of our highest priorities.

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

Scope of this Policy:

This Personal Information Protection Policy applies to Courtenay and District Fish & Game Protective Association. This policy also applies to any service providers collecting, using or disclosing personal information on behalf of CDFGPA.

Definitions:

Personal Information – means information about an identifiable individual [. E.g., including name, age, home address and phone number, Member#, social insurance number, employment information]. 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 CDFGPA complies with this policy and PIPA.

1. Collecting Personal Information

1.1 Unless the purposes for collecting personal information are obvious and the member, employee or 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 member, employee or guest information that is necessary to fulfill the following purposes:

- To verify identity;
- To verify credit worthiness;
- To identify [client, customer, member] preferences;
- To open and manage an account;
- To deliver requested products and services
- To guarantee a travel or hotel reservation;
- To process a magazine subscription;
- To enroll the client in a program;
- To send out association membership information;
- To contact our [clients, customers, members] for fundraising;
- To ensure a high standard of service to our [clients, customers, members];
- To meet regulatory requirements;
- To assess suitability for tenancy;

2. Consent

2.1 We will obtain member, employee and 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 e.g., orally, in writing, electronically, through an authorized representative] 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, employee and guest are 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, fundraising and the client, customer, member 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), members, employees and guests can withhold or withdraw their consent for CDFGPA to use their personal information in certain ways. A member, employee and guests' 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 member, employee and guest in making the decision.

2.5 We may collect, use or disclose personal information without the members, employees and 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;

- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law

3. Using and Disclosing Personal Information

3.1 We will only use or disclose members, employees and guests' 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 member surveys to enhance the provision of our services;
- To contact our members and/or employees directly about products or services that may be of interest.

3.2 We will not use or disclose member, employee and guest personal information for any additional purpose unless we obtain consent to do so.

3.3 We will not sell member, employee or guest lists or personal information to other parties.

4. Retaining Personal Information

4.1 If we use member, employee and guest personal information to make a decision that directly affects the member, employee and guest, we will retain that personal information for at least one year so that the member, employee and guest has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, we will retain member, employee and guest personal information only if necessary to fulfill the identified purposes or a legal or business purpose.

5. Ensuring Accuracy of Personal Information

5.1 We will make reasonable efforts to ensure that member, employee and guest personal information is accurate and complete where it may be used to make a decision about the member, employee and guest or disclosed to another organization.

5.2 Members, employee or guest may request correction to their personal information to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide enough detail to identify the personal information and the correction being sought. A request to correct personal information should be forwarded to the Office Administrator.

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 members, employees, and guest correction request in the file.

6. Securing Personal Information

6.1 We are committed to ensuring the security of member, employee and guest 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 member, employee and guest personal information is appropriately protected:

1. separately locked inner office (no unaccompanied access by employees.
2. locked outer office with limited key access.
3. locked building with limited access
4. keys signed out if authorized
5. use of user IDs and passwords for office computers

6.3 We will use appropriate security measures when destroying members, employees, and guest 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.

7. Providing Members, Employees and Guests Access to Personal Information

7.1 Members, employees and guests have a right to access their personal information, subject to limited exceptions.

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 Office Administrator and approved by an Executive member.

7.3 Upon request, we will also tell members, employees 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 member, employee and guest of the cost and request further direction from the member, employee and guest 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, employee and guest in writing, providing the reasons for refusal and the recourse available to the member, employee and guest.

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 Courtenay and District Fish & Game Protective Association's compliance with this policy and the Personal Information Protection Act.

8.2 Members, employees and guests should direct any complaints, concerns or questions regarding CDFGPA's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the member, employee and guest may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for CDFGPA's Privacy Officer or dedicated individual: Jessie Kobelka, Office Administrator, 250-338-0850 or the-office@courtenayfishandgame.org

**AGREEMENT – COURTENAY AND DISTRICT FISH & GAME PROTECTIVE ASSOCIATION’S
PERSONAL INFORMATION PROTECTION POLICY**

We are pleased to welcome you to the CDFGPA team.

This is an opportunity to provide you a copy of the Personal Information Protection Policy. This document is intended as an easy reference tool for any concerns. Should any of your questions remain unanswered, please contact the designated Human Resources Director _____ at Tel# _____.

All the CDFGPA’s policies are evolving documents that may be adapted as appropriate to reflect cultural and organizational as well as the modifications that are constantly being made to government regulations. We, CDFGPA are committed to maintaining open and transparent communication with all employees and will provide updated policies (where applicable) in a timely manner.

ACKNOWLEDGEMENT OF HAVING READ AND UNDERSTOOD THE PERSONAL INFORMATION PROTECTION POLICY

I, _____, attest that I have read the Personal Information Protection Policy.

Employee – Signature _____ Date _____

Employer – Print Name _____

Employer – Signature _____ Date _____

The original copy is given to the employee and the employer retains a photocopy for their files.