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Practices & Procedures

Subject: Privacy Policy

Document owner: Vice-President

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Summary

The present document outlines the purposes for which the Trout Lake Vancouver Community Centre Association collects a limited amount of personal information from members. It also highlights how the Association respects the privacy and personal information of its members, and sets out policies and procedures to ensure compliance with the British Columbia Personal Information Protection Act (PIPA). It includes important information for members, including on things such as how to formulate complaints or unsubscribe from TLVCCA electronic correspondence.



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Preamble

The British Columbia Personal Information Protection Act (“PIPA”) (enacted 2004) regulates the information and privacy practices of corporations, not-for-profits, charities, trade unions, credit unions, and other private sector organizations that collect, use, or disclose personal information.” (Government of BC website – <https://www.oipc.bc.ca/for-private-organizations.aspx>)

PIPA describes how most private sector organizations (including non-profits) must handle the personal information of its employees and the public (including members). PIPA also gives individuals the right to access the personal information an organization has about them and ask for their personal information to be corrected if they think it is incorrect or incomplete. Personal information means information that can identify an individual. PIPA allows personal information to be collected, used or disclosed for reasonable purposes [section 4(2)]. Under PIPA, reasonable means what a reasonable person would think is appropriate in the situation.

Trout Lake Vancouver Community Centre Association collects a limited amount of personal information from members in order to carry out its responsibilities and effectively service its membership and community. The Association also respects the privacy and personal information of its members, and sets out the following policies and procedures to ensure compliance with PIPA.

1.0 Policy Statements

1.1 Accountability

Trout Lake Vancouver Community Centre Association is responsible for all personal information under its control, as well as the policies and procedures used to handle the information, and to ensure compliance with the provincial privacy legislation in force.

1.2 Purpose for Collection of Information

Personal information is collected from members:

- To verify identity;
- To identify member preferences;
- To open and manage an account;
- To deliver requested products and services;
- To volunteer to assist in Association programming;
- To send out Association membership information.

Primary information collection will take place at the time of registration for membership.

- Demographic information such as:

- Name
- Gender
- Address – residence or alternate address
- Phone number(s) – mobile, home, business
- Email address
- Applications to volunteer in Association programming may require additional information
 - Date of membership application

Members will be notified if their personal information is to be used for purposes other than those listed here. In the normal course of business, the information may be viewed by Centre staff or Association staff or volunteers.

1.3 Consent

Member consent to collect, use or disclose personal information will be obtained except where, as noted below, Trout Lake Vancouver Community Centre Association is authorized to do so without consent.

Consent can be provided 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. 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 electronic distribution of information, mail, the marketing of new services or programs and the member does not opt-out.

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 can withhold or withdraw their consent to use their personal information in certain ways.

Trout Lake Vancouver Community Centre Association 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;
- 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

A full listing of such circumstances can be found in sections 12, 15, and 18 of PIPA.

1.4 Limiting Collection

Personal information collected on members is limited to the purposes as identified. Additional information or disclosure would require notification to the member(s).

1.5 Limiting Use, Disclosure and Retention

Personal information will not be used, disclosed or retained for purposes other than those identified above and will only be retained for as long as necessary to fulfill those purposes or as required by law. When it is no longer required, all personal information would be destroyed in a manner that recognizes the sensitivity of the information.

1.6 Accuracy

Members are strongly encouraged to keep their records up to date to ensure accuracy of the information, and advise the Association immediately about any change. 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.

1.7 Safeguards

Trout Lake Vancouver Community Centre Association takes reasonable steps appropriate to the sensitivity of the information to ensure that the personal information under its control will be protected from unauthorized use and disclosure. Suitable security measures will be taken when destroying member's personal information which may include shredding documents and /or permanently deleting electronically stored information. These measures will be reviewed and updated regularly as technology changes to ensure ongoing personal information security.

1.8 Openness

The Trout Lake Vancouver Community Centre Association policies are available through the website or in print.

1.9 Individual Access

An individual can request to view their personal information held by the Association by contacting the privacy officer (5.11) in writing and providing sufficient detail to identify the personal information being sought. A member can challenge the accuracy and completeness of the information and have it amended as soon as possible.

1.10 Challenge Regarding Compliance

A member may submit a complaint regarding Trout Lake Vancouver Community Centre Association's compliance with PIPA through the Privacy Officer. In the event the complainant remains dissatisfied, a formal complaint can be made to the Provincial Information and Privacy Commissioner.

1.11 Privacy Officer and Contact Information

Second Vice-President

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1.12 Complaint Process

PIPA requires that every organization dealing with personal information have a complaint handling process. The Trout Lake Vancouver Community Centre Association (TLVCCA) process is:

The individual responsible for receiving and investigating complaints is the TLVCCA Privacy Officer.

Any complaint will be investigated within 30 days of its receipt or provide written notice of an extension where additional time is required to fulfill the request.

Any recommendation for corrective action is determined by the Privacy Officer, and implemented by the Privacy Officer and staff.

The decision about the validity of the complaint, and, if valid, the corrective action taken is reported to the Complainant, the Board of Directors and staff affected by the decision.

If a complaint is not upheld in full or in part nor any corrective action deemed necessary, the Privacy Office will notify the member in writing, any provide the reasons for refusal and the recourse available to the member.

1.13 Unsubscribe From TLVCCA Email Distribution Lists

The Canadian Anti Spam law requires that organizations must have a process for removing persons, who request to be removed from the organization's email distribution lists and not receive future emails. TLVCCA complies with this by including a link at the end of each email, sent using the TLVCCA email distribution list, allowing persons to unsubscribe from future emails. Once a person has selected this unsubscribe link option, a browser opens up to confirm that the recipient has successfully.

2.0 Roles and responsibilities

Document Owner is First/Second/Third Vice-President.

Revision schedule and approvals are as per policy on creation and approval of TLVCCA policies.

Table 1: Association policy amendment history

Version	Date	Comments
1.0	October 2016	New policy
2.0	January 9, 2019	Final draft
2.0	February 27, 2019	Board approval