



## Victoria Blues Society - Privacy Policy Updated September 2021

The Victoria Blues Society is committed to providing our members and customers with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our members and clients, protecting their personal information is one of our highest priorities.

While we have always respected our members and customer's 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 and customers 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 and client's personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our members and client's personal information and allowing our members and customers to request access to, and correction of, their personal information.

### Definitions

**Personal Information** – means information about an identifiable individual including name, 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 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 Victoria Blues Society complies with this policy and PIPA.



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### Policy 1 – Collecting Personal Information

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

To deliver requested products and services

To contact our members or customers for fundraising;

### Policy 2 – Consent

2.1 We will obtain member or 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 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 or customer voluntarily provides personal information for that purpose.

2.3 Consent may also be implied where a member or customer 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, fundraising and the member or customer 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 or customers can withhold or withdraw their consent for Victoria Blues Society to use their personal information in certain ways. A member or customer 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 or customer in making the decision.

2.5 We may collect, use or disclose personal information without the members or customer'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;

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



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### Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only use or disclose member or customer 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 client, customer, member surveys in order to enhance the provision of our services;
  - To contact our members or customers directly about products and services that may be of interest;
- 3.2 We will not use or disclose member or customer personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell member or customer lists or personal information to other parties

### Policy 4 – Retaining Personal Information

- 4.1 If we use member or customer personal information to make a decision that directly affects the member or customer, we will retain that personal information for at least one year so that the member or customer has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain member or customer'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 that member or customer personal information is accurate and complete where it may be used to make a decision about the member or customer or disclosed to another organization.
- 5.2 Members or customers 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.
- 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 member or customers correction request in the file.

### Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of member or customer'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 member or customer's personal information is appropriately protected:

Stored on private premises not accessible to the public, physically securing rooms where personal information is held; the use of user IDs, passwords, encryption, firewalls; restricting access to personal information as



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appropriate (i.e., only those that need to know will have access; contractually requiring any service providers to provide comparable security measures.

- 6.3 We will use appropriate security measures when destroying Member or customer's personal information such as *shredding documents, 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 and Customers Access to Personal Information**

- 7.1 Members or customers have a right to access their personal information, subject to limited exceptions, as outlined in in section 23 of PIPA.
- 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.
- 7.3 Upon request, we will also tell members or customers 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 or customer of the cost and request further direction from the member or customer 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 member or customer in writing, providing the reasons for refusal and the recourse available to the member or customer.

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

- 8.1 The Privacy Officer is responsible for ensuring Victoria Blues Society's compliance with this policy and the *Personal Information Protection Act.*
- 8.2 Members or customers should direct any complaints, concerns or questions regarding Victoria Blues Society compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the member or customer may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Victoria Blues Society Privacy Officer:

Deb Rhymer  
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Box 5157 Victoria BC V8R 6N4  
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