

# Kamloops Outdoor Club

## Personal Information Protection Policy

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At Kamloops Outdoor Club, we are committed to protecting the personal information of our members. As providing Club services involves the collection, use and disclosure of some personal information about our members, protecting this 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, and 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 including name, age, home address, phone number, photographic image and e-mail address. 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 responsible for ensuring that Kamloops Outdoor Club complies with this policy and PIPA.

### **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 members' information that is necessary to fulfill the following purposes:
  - To contact and communicate with members concerning club outings, activities and business;
  - To communicate with a members emergency contact person if needed;
  - To carry out the business of the club.

### **Policy 2 – Consent**

- 2.1 We will obtain members' 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 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 mail-outs, or photo albums and the members does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or the withdrawal of consent would frustrate the performance of a legal obligation), members can withhold or withdraw their consent for Kamloops Outdoor Club to use their personal information in certain ways. A member's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service. If so, we will explain the situation to assist the member in making the decision.
- 2.5 We 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 (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;

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

- 3.1 We will only use or disclose members' personal information where necessary to fulfill the purposes identified at the time of collection
- 3.2 We will not use or disclose member's personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell members lists or personal information to other parties.
- 3.4 When group e-mail postings are made to inform all members of upcoming activities, individual e-mail addresses will be hidden from view.
- 3.5 Club member lists are distributed to all members annually. Before club member lists are distributed, each member will be given the opportunity to have any or all information hidden from view. ONCE MEMBER LISTS ARE DISTRIBUTED TO ALL MEMBERS THE CLUB CAN NO LONGER GUARANTEE THE PERSONAL INFORMATION WILL REMAIN SECURE.

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

- 4.1 If we use a member's personal information to make a decision that directly affects the member, we will retain that personal information for at least one year so that the member has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain a member's personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose or upon cessation of membership in Kamloops Outdoor Club.
- 4.3 Photographic images posted on the club website or in on-line albums cannot reasonably be deleted.

### **Policy 5 – Ensuring Accuracy of Personal Information**

- 5.1 We will make reasonable efforts to ensure that members personal information is accurate and complete where it may be used to make a decision about the members or disclosed to another organization.
- 5.2 A 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.
- 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's correction request in the file.

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

- 6.1 We are committed to ensuring the security of members' 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 members' personal information is appropriately protected:
  - Stored on a computer or in a file cabinet in the home of the Membership chairperson.

- 6.3 We will use appropriate security measures when destroying member's 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.

### **Policy 7 – Providing Members Access to Personal Information**

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

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

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

#### **Contact information for Kamloops Outdoor Club's Privacy Officer:**

Contact the Club President

Reviewed: May 2019