



## **Preamble**

At British Columbia Excluded Employees Association (BCEEA), we are committed to providing our members with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our members, protecting their 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, 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*** – information about an identifiable individual and includes employee personal information but does not include contact information, or work product information;

***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 British Columbia Excluded Employees Association complies with this policy and PIPA.

***Work Product Information*** - means information prepared or collected by an individual or group of individuals as a part of the individual's or group's responsibilities or activities

related to the individual's or group's employment or business but does not include personal information about an individual who did not prepare or collect the personal information.

### **Policy 1 – Person Responsible**

- 1.1 Under PIPA, organizations must designate and identify an individual who is responsible for ensuring the organization complies with the Act. For the purposes of this policy, the BCEE Executive Director is this responsible person. The Executive Director may delegate this responsibility to another individual. We will make the name, position/title and contact information for the responsible person.

### **Policy 2 - Collecting Personal Information**

- 2.1 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.
- 2.2 We will only collect member information to fulfill the following purposes:
- To verify identity (e.g. name, ministry/employer, position, employee number, work address (street, city, phone), work email, home address (street, city, phone), home/alternative email.
  - To identify member preferences for services;
  - To understand the information needs of our members;
  - To deliver requested products and services;
  - To provide advisor services;
  - To enrol the member in a program or workshop;
  - To send out association membership information;
  - To contact our members for fundraising;
  - To ensure a high standard of service to our members;
  - To meet regulatory requirements.

### **Policy 3. – Consent**

- 3.1 We will obtain member consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 3.2 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.

- 3.3 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, the marketing of new services or products, fundraising and the member does not opt-out.
- 3.4 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 can withhold or withdraw their consent for BCEEA 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 or product. If so, we will explain the situation to assist the member in making the decision.
- 3.5 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;
  - To investigate an anticipated breach of an agreement or a contravention of law.

#### **Policy 4 – Using and Disclosing Personal Information**

- 4.1 We will only use or disclose member 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 in order to enhance the provision of our services;
  - To contact our members directly about products and services that may be of interest.
- 4.2 We do not sell the personal information we collect. We will not disclose personal information to anyone else without prior knowledge or consent, except where required by law.

## **Policy 5 – Retaining Personal Information**

- 5.1 If we use member personal information to make a decision that directly affects the client, customer, 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.
- 5.2 Subject to policy 5.1, we will retain member personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

## **Policy 6 – Ensuring Accuracy of Personal Information**

- 6.1 We will make reasonable efforts to ensure that member personal information is accurate and complete where it may be used to make a decision about the member or disclosed to another organization.
- 6.2 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.
- 6.3 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' correction request in the file.

## **Policy 7 – Securing Personal Information**

- 7.1 We are committed to ensuring the security of member personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 7.2 The BCEEAA maintains physical, electronic and administrative safeguards that are appropriate to the type of personal information we obtain from members.

The following security measures will be followed to ensure that member personal information is appropriately protected:

- the use of locked filing cabinets;
- physically securing offices where personal information is held;
- the use of user IDs, passwords, encryption, firewalls;
- restricting employee access to personal information as appropriate.
- only those that need to know will have access;
- contractually requiring any service providers to provide comparable security measures.

- 7.3 We will use appropriate security measures when destroying member's personal information such as shredding documents and deleting electronically stored information.
- 7.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

#### **Policy 8 – Providing Members Access to Personal Information**

- 8.1 Members have a right to access their personal information, subject to limited exceptions.
- 8.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.
- 8.3 Upon request, we will also tell members how we use their personal information and to whom it has been disclosed if applicable.
- 8.4 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.
- 8.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the member of the cost and request further direction from the member on whether or not we should proceed with the request.
- 8.6 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 or designated individual**

- 8.1 The designated individual (see Policy 1) is responsible for ensuring BCEE's compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Members should direct any complaints, concerns or questions regarding BCEE's compliance in writing to the designated individual. If the designated individual is unable to resolve the concern, the member may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for the BCEE Designated Individual:

Elizabeth Gilliland, Executive Director  
BC Excluded Employees Association  
303-852 Fort Street, Victoria, BC V8W 1H8  
Phone: 250-590-9800  
Email: [Lizgilliland@bcee.ca](mailto:Lizgilliland@bcee.ca)