

Personal Information Protection Act

Privacy Policy

Newcomers' Club of Greater Victoria

At Newcomers' Club of Greater Victoria ("NCGV"), we are committed to giving newcomers to the Greater Victoria area an opportunity to become acquainted with others through activities of mutual interest and to supplying useful information about the local community to club members. Since providing these services and activities 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 like NCGV may collect, use and disclose personal information.

We will inform our members about 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 Privacy 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 your name, home address, email address, telephone number(s), when you arrived in the Greater Victoria area and where you came to Victoria from. 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 NCGV 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 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 information that is necessary to fulfill the following purposes:

- To register a person who has applied to become a new member or upon the annual renewal of her membership;
- To determine eligibility for membership;
- To determine a member's year of graduation from NCGV;
- To register a member for a monthly Luncheon;
- To collect and process fees for registration, membership renewals and luncheons;
- To identify member preferences in terms of activities;
- To register a member for participation in (an) activity group(s) or for an activity within that group and to allow the activity group convener or activity leader to contact the member;
- To allow members to contact each other e.g. to arrange for ride-sharing or general socializing opportunities;
- To determine how a member may wish to volunteer with NCGV;
- To send out NCGV membership information and notices (e.g. for Annual General Meetings);
- To send members a copy of the monthly Newsletter;
- To notify members for fundraising events;
- To allow guests to participate in activities by signing a liability waiver (for insurance purposes);
- To meet regulatory requirements under the *Societies Act*;

Policy 2 – Consent

2.1 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).

2.2 Consent can be provided orally, in writing, electronically 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, e.g. when a member applies to become a member, to renew her membership or to register for a luncheon or an activity group.

2.3 Subject to certain exceptions (e.g., when the personal information is necessary to provide a member service or activity or the withdrawal of consent would frustrate the performance of a legal obligation), members can withhold, restrict or withdraw their consent for NCGV 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 NCGV's ability to provide a particular service or activity. If so, we will explain the situation to assist the member in making the decision.

2.4 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 3 – Using and Disclosing Personal Information

3.1 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 or activities;
- To contact our members directly about activities that may be of interest;

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

3.3 We will not provide member personal information to other parties unless we have consent to do so.

3.4 Our Bylaws specifically prohibit NCGV and its members from using the list of members for the purposes of sales or soliciting.

Policy 4 – Retaining Personal Information

4.1 If we use member personal information to make a decision that directly affects the member, we will retain that personal information for at least one year after the member graduates from NCGV, leaves the Club sooner than 4 years after joining or for any other reason, is no longer considered a member of NCGV. This is so that the member has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, we will retain member personal information only as long as necessary to fulfill the identified purposes or a legal or NCGV purpose. *See the NCGV Records Management Policy in the Procedures Manual under Members Information on the NCGV website: newcomersclubofgreatervictoria.com.*

Policy 5 – Ensuring Accuracy of Personal Information

5.1 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 (e.g. to a Newcomers' Alumni Club with consent).

Policy 6 – Securing Personal Information

6.1 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.

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

- The use of user names and passwords to access Members Only Information on the NCGV Website, including the Membership Roster;
- Restricting access to the personal information that is not included in the Membership Roster to those members who need to collect, use or disclose that information; namely, Directors, Officers, those members holding Appointed Positions, Activity Group Conveners or Leaders of Activities within an Activity Group or other members who need to contact each other for Club purposes.
- Requiring those members who have authority to collect, use and disclose member personal information to keep the personal information secure on their computers, laptops, or other electronic devices and on the Website.

6.3 We will use appropriate security measures when destroying members' personal information such as shredding documents and deleting electronically stored information following the required retention period noted in the *NCGV Records Management Policy*.

6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Questions and Complaints: The Role of the Privacy Officer or Designated Individual

7.1 The Privacy Officer is responsible for ensuring NCGV's compliance with this policy and the *Personal Information Protection Act*.

7.2 Members should direct any complaints, concerns or questions regarding NCGV's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the member may also contact the Information and Privacy Commissioner of British Columbia.

Contact information for NCGV's Privacy Officer or Designated Individual:

Communications Coordinator

webmaster@newcomersclubofgreatervictoria.com

Contact information for the Information and Privacy Commissioner of British Columbia:

PO Box 9038 Stn. Prov. Govt.

Victoria, B.C. V8W 9A4

Tel: (250) 387-5629 Email: Info@oipc.bc.ca