

B.C. Pets and Friends Society

Personal Information Protection Policy

Overview and Application

At B.C. Pets and Friends Society (**Pets and Friends**), we are committed to providing our clients and volunteers with highly rewarding experiences. Since we sometimes collect, use and disclose Personal Information about individuals at client facilities and our volunteers, employees and directors (**Clients and Representatives**), protecting their Personal Information is one of our highest priorities.

As required by British Columbia's *Personal Information Protection Act* (PIPA), we will (1) inform our Clients and Representatives of why and how we collect, use and disclose their Personal Information, (2) obtain their consent where required, and (3) handle their Personal Information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy outlines the principles and practices we will follow in protecting the Personal Information of our Clients and Representatives. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our Clients and Representatives' Personal Information and allowing our Clients and Representatives' to request access to, and the correction of, their Personal Information.

This Policy applies to Pets and Friends and all persons collecting, using or disclosing Personal Information on our behalf.

Definitions

Personal Information – means information about an identifiable individual, such as name, age, home address, a photograph or video, and medical information. 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 by the Board of Directors as responsible for ensuring that Pets and Friends complies with this Policy and PIPA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting Personal Information are obvious and the Client or Representative voluntarily provides their 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 Client and Representative information that is necessary to fulfill the following purposes:
 - To verify identity;

- To identify preferences and availability or other information reasonably required to perform or receive volunteer or paid services;
- As required to support an employment relationship, including banking information; To enrol a Client or Representative in a program, activity or event;
- To send out society membership or other information regarding programs, activities or events of Pets and Friends;
- To contact our Clients and Representatives for fundraising or volunteer appreciation events;
- To ensure a high standard of service to our Clients and Representatives; and
- To meet legal requirements.

Policy 2 – Consent

- 2.1 We will obtain our Clients and Representatives' 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, or electronically, or it can be implied where the purpose for collecting using or disclosing the Personal Information would be considered obvious and the Client or Representative voluntarily provides Personal Information for that purpose.
- 2.3 Consent may also be implied where a Client or Representative is given notice and a reasonable opportunity to opt-out of their Personal Information being used for mail-outs, marketing, volunteer opportunities or appreciation events, or fundraising and the Client or Representative does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the Personal Information is necessary to provide our services or products, or the withdrawal of consent would frustrate the performance of a legal obligation), Clients and Representatives can withhold or withdraw their consent for Pets and Friends to use their Personal Information in certain ways. A Client or Representative'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 Client or Representative in making the decision.
- 2.5 We may collect, use or disclose Personal Information without the Client or Representative's knowledge or consent in the limited circumstances permitted by section 12, 15 and 18 of PIPA, including:
- 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; or
 - 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 the Personal Information of Clients and Representatives 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 or Representative surveys to enhance the provision of our services;
 - To share Client or Representative information with client facilities as reasonably required to arrange for the provision of goods or services; meet asks of facility;

- To conduct volunteer appreciation initiatives or activities;
- To enable third-party service providers to perform authorized functions on behalf of Pets and Friends; and
- To contact our Clients and Representatives directly about products and services that may be of interest.

3.2 We will not use or disclose Client or Representative Personal Information for any additional purpose unless we obtain consent to do so.

3.3 We will not sell Client or Representative lists or Personal Information to other parties unless we have consent to do so.

Policy 4 – Retaining Personal Information

4.1 If we use Client or Representative Personal Information to make a decision that directly affects the Client or Representative, we will retain that Personal Information for at least one year so that the Client or Representative has a reasonable opportunity to request access to it.

4.2 Subject to Policy 4.1, we will retain Client or Representative 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 Client or Representative Personal Information is accurate and complete where it may be used to make a decision about the Client or Representative or disclosed to another organization.

5.2 Clients and Representatives may request corrections to their Personal Information to ensure its accuracy and completeness. A request to correct Personal Information must be made to the Privacy Officer (privacyofficer@petsandfriends.org) 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 Client or Representative's correction request in the file.

Policy 6 – Securing Personal Information

6.1 We are committed to ensuring the security of Client and Representative Personal Information 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 Client and Representative Personal Information is appropriately protected:

- Use of passwords;
- Specific privacy training for Representatives;
- Vet third-party service providers;

- Conduct regular privacy audits; and
- Restricting access to Personal Information as appropriate.

6.3 We will use appropriate security measures when destroying a Client or Representative'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 Clients and Representatives Access to Personal Information

7.1 Clients and Representatives have a right to access their Personal Information, subject to limited exceptions outlined in section 23 of PIPA.

7.2 A request to access Personal Information must be made to the Privacy Officer (privacyofficer@petsandfriends.org) in writing and provide sufficient detail to identify the Personal Information being sought.

7.3 Upon request, we will also tell Clients and Representatives 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 Client or Representative of the cost and request further direction from the Client or Representative on whether we should proceed with the request.

7.6 If a request is refused in full or in part, we will notify the Client or Representative in writing, providing the reasons for refusal and the recourse available to the Client or Representative.

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

8.1 The Privacy Officer is responsible for ensuring Pet and Friends' compliance with this Policy and PIPA.

8.2 Clients and Representatives should direct to the Privacy Officer (privacyofficer@petsandfriends.org) any complaints, concerns or questions regarding Pets and Friends' compliance with this Policy or PIPA. If the Privacy Officer is unable to resolve the concern, the Client or Representative may also write to the Information and Privacy Commissioner of British Columbia.