

89 (Pacific) Royal Canadian Air Cadet Squadron Support Association

Resolution #17

Privacy Policy

Our Commitment to Privacy

The Society is committed to maintaining the security, confidentiality and privacy of personal information of any identifiable individual which information is under its control. The Society has always respected such privacy and remains committed to do so in the future. The Society has produced this written Privacy Policy to document its on-going commitment to protect the privacy of all information which is, or in the future comes within, its control, respecting identifiable individuals involved with the Air Cadet movement. This Privacy Policy has been developed to ensure the Society complies with the requirements of the British Columbia *Personal Information Protection Act (PIPA)*.

Scope of Privacy Policy

This Privacy Policy applies to the Society. This Privacy Policy addresses personal information about identifiable individuals and does not apply to the information collected, used or disclosed with respect to corporate or commercial entities.

Although the Society may chose to protect the privacy of personal information that is not protected by PIPA, this Privacy Policy does not impose any limits on the Society with respect to the collection, use or disclosure of personal information which is not protected by PIPA, examples of which include the following types of personal information:

- Business contact information which means information to enable an individual at a place of business to be contacted, such as the name, title or position of the individual, business telephone number, business address, business email or business fax number of the individual;
- Information which PIPA deems there to be consent for, such as, the collection, sue and disclosure of information that is voluntarily provided by an individual and at the time it is provided the purpose would be considered to be obvious to a reasonable person;
- Publicly available information recognized under PIPA, such as, the name, address, telephone number and other personal information of a subscriber that appears in a telephone directory or is available through directory assistance, if the directory or directory assistance service is available to the public and the subscriber is permitted to refuse to have his personal information in the directory or made available by directory assistance.

Definitions

In this Policy:

“collection” means the act of gathering, acquiring, or obtaining personal information from any source, including third parties, by any means.

“consent” means voluntary agreement to the collection, use and disclosure of personal information for specified purposes. Consent may be express or implied. Express consent can be given orally or in writing, it is unequivocal and does not require any inference on the part of the Society. Implied consent exists when the Society can reasonably infer consent based upon your action or inaction.

“disclosure” means making personal information available to a third party.

“personal information” means information about an identifiable individual but does not include business contact information of an individual. Personal information does not include information that is about corporate or commercial entities. It also does not include information that cannot be associated with a specific individual.

“PIPA” means the British Columbia *Personal Information Protection Act* S.B.C. 2003, c.63, as amended from time to time.

“the Society” means 89 (Pacific) Royal Canadian Air Cadet Squadron Support Association, which is a Society registered under the *BC Society Act* RSBC 1996 Chapter 433

“third party” means an individual or organization other than the Society and you.

“Privacy Officer” means an individual designated by the Society who is responsible for the Society’s compliance with this Privacy Policy and who can be contacted as set out in this Privacy Policy.

“use” means the treatment and handling of personal information by and within the Society.

Our Ten Privacy Principles

1. Accountability

The Society is responsible to protect the personal information under its control. The Society has designated a Privacy Officer who is responsible for the Society’s compliance with this Privacy Policy.

The Privacy Officer for the Society may delegate such duty to another individual accordingly, such other individual may be responsible for the collection, use and disclosure of personal information. Should such a delegation of duty occur the position name or title of such other individual will be made available to the public.

The Privacy Officer of 89 (Pacific) RCACS Support Association may be contacted through the Squadron Officer in the Bay Street Armoury

89 (Pacific) RCACS Support Association
Bay Street Armoury
715 Bay Street
Victoria BC V8T 1R1

phone/fax 250-363-8150
email: bpc@aircadetleague.bc.ca

The Society has and will continue to adopt and approve procedures to protect personal information, receive and respond to complaints and inquiries, train staff regarding policies and procedures and communicate policies and procedures to you.

2. Purposes

The Society collects, uses and discloses your personal information for the following reasons:

- To ensure that in the process of selecting individual to be involved with the Air Cadet movement, that individuals are selected who are best suited to make such a contribution. It is important in this selection process to ascertain and individual's previous volunteer activities, as well as any special skills such individual will bring to the Air Cadet movement. In addition, when an individual is selected for a position of trust such direct involvement with Air Cadets, carrying out fundraising activities or being responsible for the Society's funds, it is important that the individual possess the appropriate skills for such a position. All individuals, will, in addition to providing the Society with details such as names, addresses and phone numbers, be required to provide the Society with a criminal record check to ensure the integrity of the Society and the Air Cadet movement as a whole;
- To enable the Society to provide and administer services needed and requested not only within the Society but with other organizations involved with the Air Cadet movement, such as the Department of National Defence, the Air Cadet League of Canada, British Columbia Provincial Committee, other Sponsoring Committees in British Columbia and all of the suppliers of equipment and facilities to the Society, all with the intent to ensure the facilitation, support, promotion and carrying out the programs of the Air Cadet League of Canada within the Province of British Columbia;
- To comply with legal and regulatory requirements;
- To carry out its purposes, the Society may be required to share personal information with third parties, such as those referred to above.

You may instruct the Society to refrain from collecting, using or disclosing your personal information in ways described above at any time by providing written notification to the Society's Privacy Officer.

When personal information that has been collected is to be disclosed for a purpose not previously identified, the new purpose shall be identified prior to disclosure and consent for same shall be obtained from you unless the use is authorized or required by PIPA or other laws.

3. Consent

The Society will obtain your consent to collect, use or disclose personal information except where the Society is authorized or required by PIPA or other laws to do so without consent or where consent is deemed to have obtained. For example, the Society may collect, use or disclose personal information without your knowledge or consent where:

- The Society is collecting information that is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- The Society is required or authorized by law to collect the information;
- The Society reasonably expects that collection with consent would compromise the availability or accuracy of the personal information and the collection is reasonable for an investigation or proceeding; or

- The Society requires the information for the medical treatment of the individual and the individual is unable to give consent

Your consent can be expressed, implied, deemed, written or verbal and given through and authorized representative such as an attorney, representative under a Representation agreement, guardian, lawyer or other agent.

Consent may be provided through in action, such as when you fail to notify the Society that you do not wish your personal information to be collected, used or disclosed following reasonable notice that the Society intends to do so.

You may withdraw consent at any time, subject to legal or contractual restrictions, provided that reasonable notice of withdrawal of consent is given to the Society. On receipt of notice of withdrawal of consent, the Society will inform you of the likely consequences of the withdrawal of consent, which may include the inability of the Society to provide certain services for which that information is necessary.

4. Limits on Collection of Personal Information

The Society will limit collection of information to that which is reasonable and necessary to carry out its purposes and which is reasonable and necessary for the purposes consented to by you. The Society will also collect information as authorized or required by PIPA or other laws.

5. Limits for Using, Disclosing and Retaining Personal Information

Personal information will only be used or disclosed for the purposes set out above and as authorized by PIPA and other laws.

The Society will keep personal information used to make a decision affecting an individual for a minimum of a least one year after using it to make a decision.

The Society will destroy, erase or make anonymous, documents or other records containing personal information as soon as it is reasonable to assume that the original purpose is no longer being served by retention of the information and retention is no longer necessary for legal or business purposes.

The Society will take due care when destroying personal information so as to prevent unauthorized disclosure of the information.

6. Accuracy

The Society will make a reasonable effort to ensure that personal information it has collected or is using or disclosing is accurate and complete. In some cases, the Society relies on the individual to ensure that the certain information, such as an address or telephone number, is current, complete and accurate.

If you demonstrate the inaccuracy or incompleteness of personal information, the Society will amend the information as required. If appropriate, the Society will send the amended information to third parties to whom the information has been disclosed.

When a challenge regarding the accuracy of personal information is not resolved to your satisfaction, the Privacy Officer will annotate the personal information under its control with a note that the correction was requested but not made.

7. Safeguarding Personal Information

The Society protects the personal information in its custody or control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

The Society will take reasonable steps, through contractual or other reasonable means, to ensure that a comparable level of personal information protection is implemented by its suppliers and agents who work with the Society. Some specific safeguards include:

- Physical measures such as locked filing cabinets;
- Organizational measures such as restricting employee access to files and databases as appropriate;
- Electronic measures such as passwords and firewalls;
- Regular reviews of processes in place to safeguard personal information; and
- Investigative measures where the Society has reasonable grounds to believe that personal information is being inappropriately collected, used or disclosed.

Confidentiality and security are not assured when information is transmitted through e-mail, fax or other wireless communication. The Society will not be responsible for any loss or damage suffered as a result of a breach of security and/or confidentiality when information is transmitted to the Society by e-mail, fax or other wired communication or when the Society transmits such information by such means at an individual's request.

8. Openness

The Society is open about the policies and procedures it uses to protect personal information. Information about these policies and procedures will be made available in writing and electronically. However, to ensure the integrity of our security procedures and business practices, the Society will not disclose sensitive information about its policies and procedures.

Upon request, the Society will make available a description of the type of personal information held by the Society, and a general description of its use and disclosure.

9. Providing Access

You have a right to access your personal information held by the Society.

Upon written request and authentication of identity, the Society will provide you with your other personal information under its control, information about the ways in which that information is being used and a description of the individuals and organizations to whom that information has been disclosed.

The Society will make the information available within 30 days or provide written notice where additional time is required to fulfill the request.

In some situations, the Society may not be able to provide access to certain personal information. This may be the case where, for example, disclosure would reveal personal information about another individual, the personal information is protected by solicitor/client privilege, the information was collected for the purposes of an investigation or the Society is prevented by law from providing access to the personal information.

Where an access request is refused, the Society will notify you in writing, document the reasons for refusal and outline further steps which are available to you.

10. Compliance

Any inquiries, complaints or questions regarding this Privacy Policy should be directed in writing to the Privacy Officer.

The Society will give appropriate notice of any amendments to this Policy.