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| | BASTION CITY NANAIMO PROBUS CLUB | Policy No. 2019-002<br><br>APPROVED: June 12, 2019 |

**TITLE:** **PRIVACY POLICY**

## STATEMENT:

**1. PERSONAL INFORMATION PROTECTION ACT (PIPA)**

1.1 The P*ersonal Information Protection Act* (PIPA) of British Columbia governs the collection and use of personal information about an identifiable individual and requires organizations acquiring such information to do everything reasonable to protect it. PIPA applies to Bastion City Nanaimo Probus Club.

**2. WHAT IS PERSONAL INFORMATION?**

2.1 It is information about an identifiable individual except for the person's name, address and/or telephone number if they are publicly available.

**3. WHAT INFORMATION DOES BASTION CITY NANAIMO PROBUS CLUB COLLECT?**

3.1 Bastion City Nanaimo Probus collects some or all of the following information from Club Members:

a) Name;
b) Address;
c) Home telephone number;
d) Cell phone number;
e) Birth month;
f) Email address;
g) Current or former profession or vocation; and,
h) Interests and hobbies.

3.2 Completion and submission of the Club's Membership Application is deemed consent to the Club's collection and use of the above information.

## 4. USE OF INFORMATION

4.1 Information collected by the Club is used to contact Members to advise them about meetings, outings or other activities and to provide them with notices or newsletters. Birth month (optional) is collected for acknowledgement of birthdays on a monthly basis at the General Meeting. Information on Profession or Vocation, interests, and hobbies are collected for the continued operation of the Club.

4.2 With the exception of 4.1 above, information is never shared outside of the Membership Chair and the President.

4.3 Information is never provided to third parties outside of PROBUS.

## 5. MEMBERSHIP CHAIR

5.1 The Membership Chair is responsible for the maintenance of information about Members, and shall maintain the membership roll including names, postal and email addresses, telephone numbers, profession or vocation, interests, and hobbies. Contact details are available on the Club's website or by emailing the Membership Chair.

## 6. INFORMATION MAINTENANCE, ACCESS, AND RETENTION

6.1 Consistent with 5.1 above, information is stored in a computer file. A backup secure copy of the membership data base shall be maintained and be independent of the computer. An abridged copy of the file is placed on the website. Access to the file requires a password, which is available only to Club Members and is changed by the Webmaster at the start of the new fiscal year.

6.2 If a Member leaves the Club that individual's membership information is deleted.

6.3 Retention of personal information shall be consistent with Section 35 (1) and (2) of PIPA as follows:

*35 (1) Despite subsection (2), if an organization uses an individual's personal information to make a decision that directly affects the individual, the organization must retain that information for at least one year after using it so that the individual has a reasonable opportunity to obtain access to it.*

*35 (2) An organization must destroy its documents containing personal information, or remove the means by which the personal information can be associated with particular individuals, as soon as it is reasonable to assume that:*

*(a) The purpose for which that personal information was collected is no longer being served by retention of the personal information, and,*

*(b) Retention is no longer necessary for legal or business purposes.*

## 7. COMPLAINTS

7.1 If a Member registers a complaint about the collection, accuracy, use, access to and/or security of personal information then the following protocol will be implemented as soon as practicable:

7.1.1 A Member of the Management Committee, preferably the Membership Chair, will speak to the Member to ascertain the nature of the complaint.

7.1.2 A Sub-Committee of the Management Committee comprised of the President, Membership Chair, and one other Management Committee Member will determine actions to be taken in response to the complaint which may include:

a. No action deemed necessary;
b. Changes to information collected;
c. Changes to information access and/or storage;
d. Changes to information use; or,
e. Such other action as the Sub-Committee deems necessary to comply with all applicable laws.

7.1.3 The Sub-Committee will report back to the Management Committee.

7.1.4 Except where precluded by legislation, the Member will be advised of the Sub-Committee's actions in writing.

7.1.5 If the Member is dissatisfied with the Sub-Committee's response, then a complaint can be made to the Office of the Information and Privacy Commissioner at www.oipc.bc.ca.