

# Varsity Community Association

## Personal Information Protection Policy

Varsity Community Association (VCA) is committed to safeguarding the personal information entrusted to us by our members, clients, volunteers and staff. We manage your personal information in accordance with Alberta's Personal Information Protection Act and other applicable laws. This policy outlines the principles and practices we follow in protecting your personal information. The policy also applies to any person providing services on our behalf.

A copy of this policy is available on request.

### What is personal information?

Personal information means information about an identifiable individual. This includes an individual's name, home address and phone number, age, sex, marital or family status, an identifying number, financial information, educational history, health information, etc.

### What personal information do we collect?

We collect only the personal information that we need for the purposes of providing services to our members and clients, including personal information needed to:

- register for membership or activity
- open and manage an account
- deliver requested products and services
- send out association membership/activity information
- contact clients about appointments
- ensure children in our care are safe and healthy
- follow up with clients to determine satisfaction with products and services
- notify members of upcoming events of interest
- meet regulatory requirements

We may collect your information from other persons with your consent or as authorized by law.

We inform our members/clients, before or at the time of collecting personal information, of the purposes for which we are collecting the information. The only time we don't provide this notification is when someone volunteers information for an obvious purpose (for example, producing a credit card for a service when the information will be used only to process the payment or registering for membership/activities). In these cases we assume you to understand the purpose.

## Consent

We ask for consent to collect, use or disclose client personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

In cases where we collected personal information before January 1, 2004, we assume your consent to our use and, where applicable, disclosure for the purpose for which the information was collected.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask clients to provide their consent orally (in person, by telephone), in writing (by signing a consent form, by checking a box on a form, or electronically (by clicking a button).

A member/client may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfil our legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary personal information.

We may collect, use or disclose member/client personal information without consent only as authorized by law. For example, we may not request consent when the collection, use or disclosure is reasonable for an investigation or legal proceeding, to collect a debt owed to our organization, in an emergency that threatens life, health or safety, or when the personal information is from a public telephone directory.

## How do we use and disclose personal information?

We use and disclose member/client personal information only for the purposes for which the information was collected, except as authorized by law. For example, we may use client contact information to deliver goods or services. The law also allows us to use that contact information for the purpose of collecting a debt owed to our organization, should that be necessary.

We will not use or disclose your personal information for any new business purpose. Nor will we sell your information to an outside body.

## How do we safeguard personal information?

We make every reasonable effort to ensure that member/client information is accurate and complete. We rely on our clients to notify us if there is a change to their personal information that may affect their relationship with our organization. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible.

In some cases we may ask for a written request for correction.

We protect client personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

We use appropriate security measures when destroying client personal information, including shredding paper records and permanently deleting electronic records.

We retain member/client personal information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes.

### **Access to records containing personal information**

Members/clients/employees of VCA have a right of access to their own personal information in a record that is in our custody or under our control, subject to some exceptions. For example, organizations are required under the *Personal Information Protection Act* to refuse to provide access to information that would reveal personal information about another individual. Organizations are authorized under the Act to refuse access to personal information if disclosure would reveal confidential business information. Access may also be refused if the information is privileged or contained in mediation records.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to VCA's Privacy Officer, Gord Smith (VCA General Manager). You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization. For personal information collected before January 2004, if we do not have a record of disclosures, we will provide information about any disclosure of your information that is likely to have occurred.

You may also request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days, unless an extension is granted. We may charge a reasonable fee to provide information, but not to make a correction. We will advise you of any fees that may apply before beginning to process your request.

## Questions and complaints

If you have a question or concern about any collection, use or disclosure of personal information by VCA, or about a request for access to your own personal information, please contact VCA's Privacy Officer in the first instance:

General Manager Varsity Community Association Ph: 403-288-9001 or [vcagm@telus.net](mailto:vcagm@telus.net)

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta Suite 500, 640 – 5<sup>th</sup> Avenue S.W. Calgary, Alberta T2P 3G4 Phone: (403) 297-2728 Toll Free: 1-888-878-4044 E-mail: [generalinfo@oipc.ab.ca](mailto:generalinfo@oipc.ab.ca) Web site: [www.oipc.ab.ca](http://www.oipc.ab.ca)

## PIPA Personal Information Protection Act (Alberta)

### What we CAN do:

- 1 Give business card info "in house" in order to implement program
- 2 Give employment info to outside groups if required by law
- 3 Give personal info to outside party when collecting a debt
- 4 Collect personal information ONLY if it is necessary for a specific reason that the member/client is aware of

### What we can NOT do:

- 1 Give business card info to outside individuals/groups if they are not involved with our programs
- 2 Give health, credit card, employment info to anyone unless required by law
- 3 Give full membership lists to anyone unless they need a list to carry out an association task
- 4 Leave any personal info out in the open....reasonable security must be applied
- 5 Sell membership/client information