

**Personal Information Protection  
Private Sector Privacy Legislation  
Personal Information Protection Policy**

Last updated April 4, 2019

**CityStudio Vancouver Society  
Personal Information Protection Policy**

At CityStudio Vancouver, because our work involves the collection, use and disclosure of some personal information about our students, staff and other entities involved in CityStudio activities, protecting their personal information is one of our highest priorities.

While we have always respected the privacy and safeguarding of 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 may collect, use and disclose personal information.

We will inform those involved in CityStudio Vancouver activities of why and how we collect, use, keep, 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 Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of personal information and allowing those whose personal information we possess to request access to, correction of, or withdrawal of access to their personal information.

**Scope of this Policy**

This Personal Information Protection Policy applies to CityStudio Vancouver Society.

This policy also applies to any service providers collecting, using or disclosing personal information on behalf of CityStudio Vancouver.

## Definitions

**Personal Information** – means information about an identifiable *individual* (ie. date of birth, SIN, employment history, image, etc), personal contact information (including address, personal email, phone number, etc), and personal financial information (bank account and credit card details). Personal information does not include contact information (described below).

**Contact information** – means public 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 CityStudio Vancouver complies with this policy and PIPA.

## Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the individual voluntarily provides his or 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 individuals' information that is necessary to fulfill the following purposes:
  - To verify identity;
  - For communications, reporting and evaluation;
  - For contracting and payment;
  - For fundraising, collecting donations and issuing tax receipts;
  - For ensuring compliance with legislations and regulations; and
  - For medical and emergency situations.

## Policy 2 – Consent

- 2.1 We will obtain 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 in writing or it can be implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the individual voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where an individual is given notice and a reasonable opportunity to opt-out of his or her personal information being used for emails or marketing and the individual does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), individuals can withhold or withdraw their consent for CityStudio Vancouver to use their personal information in certain ways. An individual's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service. If so, we will explain the situation to assist the individual in making the decision.

2.5 We may collect, use or disclose personal information without the individual'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 it following legal advice from a lawyer;
- 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 individual personal information where necessary to fulfill the purposes identified at the time of collection as identified under Section 1.2.

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

3.3 We will not sell contact lists or personal information to other parties.

### **Policy 4 – Retaining Personal Information**

4.1 If we use personal information to make a decision that directly affects the individual, we will retain that personal information for at least one year so that the individual has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, we will retain 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 personal information is accurate and complete where it may be used to make a decision about the individual or disclosed to another organization.

5.2 Individuals may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made 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 correction request in the file.

### **Policy 6 – Securing Personal Information**

6.1 We are committed to ensuring the security of 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 personal information is appropriately protected:

- All hard copies of personal information are kept locked and physically secured;
- There is restricted physical and electronic employee access to personal information, and access is granted only when appropriate and necessary;
- Financial information is only available to staff involved in financial management;

- All personal and office computers with digital records of personal information require the use of user IDs and passwords.
- 6.3 We may store personal information on servers located outside an individual's jurisdiction of residence, including outside the country. As a result, this information may be subject to disclosure to governments, courts or law enforcement agencies in those areas, according to their laws, without notice to us or the individual.
- 6.4 We will use appropriate security measures when destroying personal information such as shredding documents and deleting electronically stored information
- 6.5 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

### **Policy 7 – Providing Individuals Access to Personal Information**

- 7.1 Individuals have a right to access their personal information, subject to limited exceptions.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.
- 7.3 Upon request, we will also tell individuals 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.

### **Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual**

- 8.1 The Privacy Officer or Communications Coordinator is responsible for ensuring CityStudio Vancouver's compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Individuals should direct any complaints, concerns or questions regarding CityStudio Vancouver's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the individual may also write to the Information and Privacy Commissioner of British Columbia.

CityStudio Vancouver Privacy Officer:

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