

**BC RECREATION AND PARKS ASSOCIATION ("BCRPA")
PERSONAL INFORMATION PROTECTION POLICY**

Purpose of BCRPA's Personal Information Protection Policy

1. Privacy of personal information is governed by the *Personal Information Protection and Electronics Documents Act* ("PIPEDA"). BCRPA's Personal Information Protection Policy describes the way that BCRPA collects, uses, and discloses personal information in the course of commercial activities, and states BCRPA's commitment to collecting, using and disclosing personal information responsibly. BCRPA's Personal Information Protection Policy is based on the standards required by PIPEDA, and BCRPA's interpretation of these responsibilities.

Accountability

2. The Personal Information Protection Officer of BCRPA is appointed by the CEO and is responsible for the monitoring of personal information collection, use, disclosure, data security and ensuring that all staff receives appropriate training on privacy issues. The Personal Information Protection Officer also handles personal information access requests and complaints. The Personal Information Protection Officer may be contacted at the following address:

BC Recreation and Parks Association
C/O Personal Information Protection Officer
301-470 Granville Street
Vancouver, BC V6C 1V5
Phone: (604) 629-0965
Fax: (604) 629-2651
Email: bcrpa@bcrpa.bc.ca

Purpose of Collection

3. Personal information will only be collected by BCRPA to meet and maintain the highest standard of organizing and programming. The personal information may be collected in person, over the telephone, through the mail or over the internet. BCRPA collects personal information for purposes described in BCRPA's Personal Information Protection Policy including, but not limited to:
 - a) Managing membership documents.
 - b) Receiving communications from BCRPA.
 - c) Registration in BCRPA training courses, quality assurance programs, and events.
 - d) Purchasing manuals, resources and other products.
 - e) Identification and determining eligibility and appropriate skill level.
 - f) Published articles and media relations.
 - g) Database entry to record certifications, tracking, generating reports and granting access to resources.
 - h) Technical monitoring, organizational review, training, and education.
 - i) Posting on BCRPA's website and websites related to BCRPA programs, displays or posters.
 - j) Gathering qualitative and quantitative information for research purposes.
4. BCRPA does not sell or disclose its membership list.

Consent

5. BCRPA will obtain consent by lawful means from individuals at the time of collection, prior to the use or disclosure of the personal information. BCRPA may collect personal information without consent where reasonable to do so and where permitted by law.
6. By providing personal information to BCRPA, individuals are consenting to the use of the information for the purposes identified in BCRPA's Personal Information Protection Policy.
7. An individual may withdraw consent to the collection, use or disclosure of personal information at any time, subject to legal or contractual restrictions. The Personal Information Protection Officer will advise the individual of the implications of such withdrawal.

Limiting Use, Disclosure and Retention

8. Personal information will not be used or disclosed by BCRPA for purposes other than those for which it was collected as described in BCRPA's Personal Information Protection Policy, except with the consent of the individual or as required by law.
9. Personal information will be retained for a reasonable period of time.

Safeguards

10. Personal information is protected by security safeguards appropriate to the sensitivity of the information against loss or theft, unauthorized access, disclosure, copying, use or modification.
11. Methods of protection and safeguards include, but are not limited to, locked filing cabinets, restricted access to offices, security clearances, need-to-know access and technological measures including the use of passwords, permissions, encryption and firewalls.

Openness

12. Information available to the public includes:
 - a) The name or title, address and telephone number of BCRPA's Personal Information Protection Officer.
 - b) A description of the type of personal information held by BCRPA, including a general statement of its approved uses.
 - c) A copy of BCRPA's Personal Information Protection Policy.

Individual Access

13. Upon written request, and with assistance from BCRPA, an individual may be informed of the existence, use and disclosure of his or her personal information and will be given access to that information. As well, an individual is entitled to be informed of the source of the personal information along with an account of third parties to whom the information has been disclosed.
14. Requested information will be disclosed to the individual within 30 days of receipt of the written request at no cost to the individual for the first two hours of labour associated with information retrieval and on a cost recovery basis thereafter.
15. An individual may be denied access to his or her personal information if:
 - a) The information contains references to other individuals;
 - b) The information cannot be disclosed for legal, security or commercial proprietary purposes;
 - c) The information is subject to solicitor-client or litigation privilege.
16. Upon refusal, BCRPA will inform the individual the reasons for the refusal and the associated provisions of *PIPEDA*.

Challenging Compliance

17. An individual may challenge BCRPA's compliance with *PIPEDA*, by submitting a challenge in writing.
18. Upon receipt of a written complaint, BCRPA will:
 - a) Record the date the complaint is received;
 - b) Notify the Personal Information Protection Officer who will serve in a neutral, unbiased capacity to resolve the complaint;
 - c) Acknowledge receipt of the complaint by way of written communication clarifying the nature of the complaint within seven (7) days of receipt of the complaint;
 - d) Appoint an independent investigator, who will have the skills necessary to conduct a fair and impartial investigation, and who will have unfettered access to all files and personnel, within fourteen (14) days of receipt of the complaint;
 - e) Upon completion of the investigation, the investigator will submit a written report to BCRPA; and
 - f) Notify the complainant of the outcome of the investigation and any relevant steps taken to rectify the complaint, including any amendments to policies and procedures.