

Loved at Last Dog Rescue Society

Personal Information Protection Policy

At Loved at Last Dog Rescue Society (LALDR), we are committed to providing our volunteers, members and applicants with exceptional service. As administering the society involves the collection, use and disclosure of some personal information about our volunteers, members and applicants, protecting their personal information is one of our highest priorities.

We respect the privacy of our volunteers, members and applicants and commit to safeguarding their personal information in accordance with 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 our volunteers, members and applicants of why and how we collect, use 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 our volunteers, members and applicants to request access to, and correction of, their personal information.

Definitions

Personal Information – means information about an identifiable *individual* including birthdate, age, home address and phone number. Personal information does not include contact information (described below).

Contact information – means 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 LALDR complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the volunteer, member or applicant 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 volunteer, member or applicant information that is necessary to fulfill the following purposes:
 - To verify identity;
 - To provide volunteers and members with society-related communication;
 - To administer the society and adhere to any regulatory requirements;
 - To send out society membership information;
 - To assess applicant suitability for adoption;
 - To facilitate the adoption process for approved applicants.

Policy 2 – Consent

- 2.1 We will obtain volunteer, member and applicant 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 orally, in writing, electronically, or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the volunteer, member or applicant voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a volunteer, member or applicant is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs or fundraising and the volunteer, member or applicant does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service, or the withdrawal of consent would frustrate the performance of a legal obligation), volunteers, members and applicants can withhold or withdraw their consent for LALDR to use their personal information in certain ways. A volunteer's, member's or applicant'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 volunteer, member or applicant in making the decision.
- 2.5 We may collect, use or disclose personal information without the volunteer's, member's or applicant'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 legal advice from a lawyer;
 - For the purposes of collecting a debt;
 - 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 volunteer, member and applicant personal information where necessary to fulfill the purposes identified at the time of collection.
- 3.2 We will not use or disclose volunteer, member or applicant personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell volunteer, member or applicant lists or personal information to other parties.

Policy 4 – Retaining Personal Information

- 4.1 If we use volunteer, member or applicant personal information to make a decision that directly affects the volunteer, member or applicant, we will retain that personal information for at least one year so that the volunteer, member or applicant has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain volunteer, member and applicant 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 volunteer, member and applicant personal information is accurate and complete where it may be used to make a decision about the volunteer, member or applicant or disclosed to another organization.
- 5.2 Volunteers, members or applicants 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 the personal information in the previous year.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of volunteer, member and applicant 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 volunteer, member and applicant personal information is appropriately protected:
 - Personal information is stored electronically with access permitted only to authorized accounts;
 - Access to personal information is provided only to individuals that require the information to perform society duties.
- 6.3 We will use appropriate security measures when destroying volunteer, member and applicant personal information such as deleting electronically stored information.
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Volunteers, Members and Applicants Access to Personal Information

- 7.1 Volunteers, members and applicants have a right to access their personal information, subject to limited exceptions as defined in section 23 of PIPA.
- 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 volunteers, members and applicants 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.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the volunteer, member or applicant of the cost and request further direction from the volunteer, member or applicant on whether or not we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify the volunteer, member or applicant in writing, providing the reasons for refusal and the recourse available to the volunteer, member or applicant.

Policy 8 – Questions and Complaints: The Role of the Privacy Officer

- 8.1 The Privacy Officer or designated individual is responsible for ensuring LALDR's compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Volunteers, members and applicants should direct any complaints, concerns or questions regarding LALDR's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the volunteer, member or applicant may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for LALDR's Privacy Officer or designated individual:

Email: society.laldr@gmail.com