

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

**NORTH VANCOUVER COMMUNITY PLAYERS
Personal Information Protection Policy**

At the North Vancouver Community Players, we are committed to providing our membership and patrons with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our membership and patrons, protecting their personal information is one of our highest priorities.

While we have always respected our membership and patrons privacy and safeguarded their 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 our membership and patrons 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 membership's and patrons' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our membership's and patrons' personal information and allowing our membership and patrons to request access to, and correction of, their personal information.

Definitions

Personal Information – means information about an identifiable *individual* [*name, address, contact number, email address*) 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 North Vancouver Community Players complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the member and/or patron 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 membership and patron information that is necessary to fulfill the following purposes:
 - To deliver requested products and services (*performance tickets*)
 - To send out association membership information;

Policy 2 – Consent

- 2.1 We will obtain membership and patrons 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 through an authorized representative, or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the membership and patrons voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a member and/or patron is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail outs, email show reminders and the member and/or patron 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), the member and/or patron can withhold or withdraw their consent for the North Vancouver Community Players to use their personal information in certain ways. A member's and/or patron's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the member and/or patron in making the decision.
- 2.5 We may collect, use or disclose personal information without the member and/or patron 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 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 member and/or patron personal information where necessary to fulfill the purposes identified at the time of collection *or for a purpose reasonably related to those purposes such as:*
 - To contact our membership and/or patrons directly about products and services that may be of interest (I.e. Show information)

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

3.3 We will not sell member and/or patron lists or personal information to other parties.

Policy 4 – Retaining Personal Information

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

4.2 Subject to policy 4.1, we will retain member and/or patron 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 member's and/or patron's personal information is accurate and complete where it may be used to make a decision about the member and/or patron.

5.2 Members and/or patrons 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. All requests to correct personal information should be forwarded to the Privacy Officer.

5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required. If the correction is not made, we will note the member's and/or patron's correction request in the file.

Policy 6 – Securing Personal Information

6.1 We are committed to ensuring the security of member and/or patron 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 member and/or patron personal information is appropriately protected:

- All electronic devices used for recording personal information are physically secured in a locked room, in locked cabinets, keys are kept in a fireproof safe.
- All electronic devices are password protected, and sales agents have very limited access to patron information.
- Ticketing software uses high level SSLA Secured 128 bit encryption software and does not store credit card information.
- All electronic devices are equipped with up to date anti-virus, anti-spam, phishing, and malware detection, firewalls, identity protection and backup.

6.3 We will use appropriate security measures when destroying member's and/or patron's personal information such as: *deleting electronically stored information or cross-shredding hard copy information where applicable. Our system does not store your credit card 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 Members and Patrons Access to Personal Information

7.1 Members and patrons have a right to access their personal information, subject to limited exceptions.

- the information is protected by solicitor-client privilege;
- the disclosure of the information would reveal confidential commercial information that if disclosed, could, in the opinion of a reasonable person, harm the competitive position of the organization;
- the information was collected or disclosed with consent, as allowed under section 12 or 18 of the PIPA, for purposes of an investigation and the investigation and associated proceedings and appeals have not been completed;
- the information was collected or created by a mediator or arbitrator in the conduct of a mediation or arbitration for which he or she was appointed to act.
 - under a collective agreement,
 - under an enactment, or
 - by a court;
- the information is in a document that is subject to a solicitor's lien.

7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. All requests to access personal information should be forwarded to the Privacy Officer.

7.3 Upon request, we will also tell members and patrons how we use their personal information.

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 member or patron of the cost and request further direction from the member and/or patron 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 member and/or patron in writing, providing the reasons for refusal and the recourse available to the member and/or patron.

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

8.1 The Privacy Officer is responsible for ensuring the North Vancouver Community Players compliance with this policy and the *Personal Information Protection Act*.

8.2 Members and patrons should direct any complaints, concerns or questions regarding North Vancouver Community Players' compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the member and/or patron may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for the North Vancouver Community Players Privacy Officer:

Privacy Officer
815 East 11th Street
North Vancouver, BC
V7L 2J2
Phone: 604-983-2633