

Privacy Policy

Last Revised on the 1st of December, 2017

Preface

In order to provide certain services and supports to our Members, the Nanaimo Pride Society (“**Society**”) from time to time will engage in the collection, use, and disclosure of some Personal Information about our members. Protecting this Personal Information is one of our highest priorities. The Society will inform our Members 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 under the circumstances. This Privacy Policy (“**Policy**”), in compliance with the British Columbia Personal Information Protection Act (“**PIPA**”), outlines the principles and practices we will follow in protecting Personal Information, including ensuring the accuracy, confidentiality, and security of our Personal Information, and allowing our Members to request access to, and the correction of, their Personal Information as necessary.

Definitions

Personal Information: Information about an identifiable person, such as their legal name, home address and phone number, their sexual orientation, and gender identity.

Board of Directors: The governing body of the Society who have been elected to manage the Society’s activities, events, and interests.

Executive Committee: The President, Vice-President, Treasurer, and Secretary of the Society.

Privacy Officer: The individual responsible for ensuring that the Society fully complies with both this Policy, and with PIPA. Unless otherwise elected, the Privacy Officer shall be the Chair of the Governance Committee.

Communications Manager: The individual responsible for the Society’s internal and external facing messaging, policies, and online communications.

Authorised Representative: A member of the Board of Directors, a member of the Executive Committee, the Communications Manager, and the Privacy Officer.

Member: A person who has paid current membership dues to, and is in good standing with, the Society.

Method: The way in which the Society will collect Personal Information, or identify the purpose for the collection of Personal Information. Unless otherwise specified, information will be collected or identified in writing, electronically or otherwise.

Scope

This Policy applies to the Society, inclusive of its Authorised Representatives and its general membership, and any service providers collecting, using, or disclosing Personal Information on behalf of the Society.

Policy

1. Collecting Personal Information

- 1.1. Unless the purposes for collecting Personal Information are obvious and the Member voluntarily provides their Personal Information for those purposes, we will communicate the purposes for which Personal Information is being collected by the Method, before or at the time of collection.
 - 1.1.1. A Member shall voluntarily provide their Personal Information for the below outlined purposes. The Society shall communicate the purposes for which Personal Information is being collected by the Method, before or at the time of collection.
- 1.2. The Society will only collect member information that is necessary to fulfill the following purposes:
 - 1.2.1. To identify member preferences, including, but not limited to, preferred names and pronouns by which they would like to be addressed;
 - 1.2.2. To understand the needs of the LGBTQ2++ community;
 - 1.2.3. To deliver services or products, such as event tickets or merchandise through an online store or comparable method;
 - 1.2.4. To process a newsletter subscription;
 - 1.2.5. To enrol the member in a particular program or service;
 - 1.2.6. To process a membership, and send out membership information;
 - 1.2.7. To contact our members regarding fundraising and/or sponsorship opportunities;
 - 1.2.8. To meet regulatory requirements.

2. Consent

- 2.1. We will obtain Member consent to collect, use, or disclose Personal Information *(except where, as noted below, we are authorized to do so without content)*.
- 2.2. Consent shall be provided by the Method, through an Authorised Representative.
- 2.3. Consent may be implied where a Member is given, by the Method, a minimum of five (5) working days notice, and a reasonable opportunity to opt out of their Personal Information being used for mail outs, fundraising, the marketing of new services, or new products, and the Member does not opt out.
- 2.4. A Member can withhold or withdraw their consent for the Society to use their Personal Information in certain ways.
 - 2.4.1. If the Member's decision to withhold or withdraw consent affects the operations of the Society (e.g., the Personal Information is necessary to provide the service or product, or necessary for the performance of a legal obligation), the Member will be provided with the specific rationale by an Authorised Representative, in order to enable the Member to make a fully informed decision to withhold or withdraw their consent.
 - 2.4.2. At no time shall an Authorised Representative be seen as coercing or leading, implied or otherwise, the Member to make a decision.
 - 2.4.3. Any requests for withholding or withdrawing content shall be made by the Method.
- 2.5. We may collect, use, or disclose Personal Information without the Member's consent in the following limited circumstances:
 - 2.5.1. When the collection, use, or disclosure of Personal Information is permitted or required by law;
 - 2.5.2. In an emergency that threatens a Member's life, health, or personal security. The Personal Information shall only be disclosed to members of the emergency response community;
 - 2.5.3. When the Personal Information is available from a public source *(e.g., a phone book, or other directory listing)*. The Society shall first direct the inquiry to utilise the public source;
 - 2.5.4. When the Society requires legal advice from a lawyer;
 - 2.5.5. To protect the Society from fraud;

- 2.5.6. To investigate an anticipated breach of an agreement or a contravention of law.

3. Using and Disclosing Personal Information

- 3.1. The Society will only use or disclose Personal Information where necessary to fulfill the purposes identified above at the time of collection, or for a purpose reasonably related to those purposes such as:
 - 3.1.1. To conduct Member surveys in order to enhance the provision of our services;
 - 3.1.2. To contact a Member directly about products and services that may be of interest.
- 3.2. The Society will not use or disclose Personal Information for any additional purpose unless written consent is given. Unless the Member has voluntarily provided consent for the use of their Personal Information prior to a formal request being made, the Society shall provide, by the Method, the purposes for which the Personal Information is being disclosed at least five (5) working days in advance, unless otherwise dictated by law.
- 3.3. The Society will not sell Member lists or Personal Information to other parties.
- 3.4. The Society shall not discuss or disclose any Personal Information via any social media platform, currently in use or developed for use in the future.
- 3.5. The Society shall not discuss or disclose any Personal Information over any electronic messaging platform, currently in use or developed for use in the future, including but not limited to, Text Messaging, iMessage, Facebook Messenger, Google Allo, Snapchat, or other similar service, unless that message is submitted to the Privacy Officer for appropriate handling.

4. Retaining Personal Information

- 4.1. If the Society uses Personal Information to make a decision that directly affects the Member, the Society will retain that personal information for at least one (1) year so that the Member has a reasonable opportunity to request access to it.
- 4.2. Subject to 4.1, the Society will retain Personal Information only as long as necessary to fulfill the identified purposes, or a legal or business purpose.

5. Accuracy of Personal Information

- 5.1.** The Society will take all reasonable efforts to ensure that Personal Information is accurate and complete where it may be used to make a decision about the Member, or disclosed to another organisation.
- 5.2.** A Member may request, by the Method, correction to their Personal Information in order to ensure its accuracy and completeness. The request shall provide sufficient detail to identify the Member and the correction being sought.
- 5.3.** If the Personal Information is demonstrated to be inaccurate or incomplete, the Society will correct the Personal Information as required and send the Personal Information to any organisation to which the Society disclosed the Personal Information in the previous year. If the correction is not made, the Society will note the correction request.

6. Securing Personal Information

- 6.1.** The Society is committed to ensuring the security of Personal Information in order to protect it from unauthorised access, collection, use, disclosure, copying, modification, disposal, or similar risks.
- 6.2.** The following security measures will be followed to ensure that Personal Information is appropriately protected:
 - 6.2.1.** The use of User IDs, passwords, encryption, firewalls, and other evolving security measures online;
 - 6.2.2.** Physically securing any location in which personal information is held under lock and key, or a similar electronic locking method;
 - 6.2.3.** Restricting access to personal information within the Society to only the Authorised Representatives;
 - 6.2.4.** Requiring any service providers to provide equal or better security measures.
- 6.3.** The Society will use appropriate security measures when destroying the Personal Information, such as the shredding of documents, and the deletion and securing wiping of any electronically stored information.
- 6.4.** The Society will continually review and update its security policies and controls as technology changes, to ensure ongoing Personal Information security.

7. Member Access to Personal Information

- 7.1.** A Member has the right to access their Personal Information, subject to limited exceptions:
 - 7.1.1.** The Personal Information is protected by lawyer-client privilege;
 - 7.1.2.** The Personal Information was collected or disclosed, without consent, as allowed under Section 2.4 and 2.5, for the purposes of an investigation, and the investigation and associated proceedings and appeals have not been completed;
 - 7.1.3.** The Personal Information was collected or created by a mediator or arbitrator in the conduct of a mediation or arbitration for which they were appointed to act under an enactment, or by a court.
- 7.2.** A request to access Personal Information must be made by the Method, and provide sufficient detail to identify the Personal Information being sought. A request to access Personal Information will be forwarded to the Privacy Officer.
- 7.3.** Unless the Member has voluntarily provided consent for the access to their Personal Information prior to a formal request being made, the Society shall provide, by the Method, the purposes for which the Personal Information is being accessed, at least five (5) working days in advance, unless otherwise dictated by law.
- 7.4.** Upon request, the Society will inform a Member how the Society uses their Personal Information, and to whom it has been disclosed if applicable.
- 7.5.** The Society will make the requested Personal Information available within thirty (30) business days, or provide notice of an extension by the Method where additional time is required to fulfill the request.
- 7.6.** If a request is refused in full or in part, the Society will notify the member in writing, providing the reasons for refusal and the recourse available to the Member.

8. Privacy Officer - Questions and Complaints

- 8.1.** The Privacy Officer is responsible for ensuring the Society's compliance with this Policy and PIPA.
- 8.2.** A Member should direct any complaints, concerns, or questions regarding the Society's compliance by the Method to the Privacy Officer. If the Privacy Officer is

unable to resolve the concern, the Member may also write to the Information and Privacy Commissioner of British Columbia.

- 8.3.** The Privacy Officer may be contacted at privacy@nanaimopride.org.