Economic Trust of the Southern Interior

Personal Information Protection Policy

At the Economic Trust of the Southern Interior (ETSI-BC), we are committed to providing our clients and partners with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our clients and partners, protecting their personal information is one of our highest priorities.

We are committed to protecting personal information and following British Columbia's *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, and 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 clients and partners 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 clients' and partners' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our clients' and partners' personal information and allowing our clients and partners to request access to, and correction of, their personal information.

Definitions

Personal Information –means information about an identifiable *individual* 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 responsible for ensuring that ETSI-BC complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

1.1 Unless the purposes for collecting personal information are obvious and the client or partner voluntarily provides their 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 personal client and partner information that is necessary to fulfill the following purposes:

- To verify identity;
- To verify creditworthiness (where required);

- To identify preferences;
- To deliver requested products and services
- To process an eNews subscription;
- To enrol the client in a program;
- To ensure a high standard of service to our clients and partners;
- To meet regulatory requirements;

Policy 2 – Consent

2.1 We will obtain client and partner 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, electronically, 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 client or partner voluntarily provides personal information for that purpose.

2.3 Consent may also be implied where a client or partner is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products, and the client or partner 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), clients and partners can withhold or withdraw their consent for ETSI-BC to use their personal information in certain ways. A client or partner'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 client or partner in making the decision.

2.5 We may collect, use or disclose personal information without the client or partner'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 client or partner 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 conduct client, customer, member surveys in order to enhance the provision of our services;
- To contact our clients and partners directly about products and services that may be of interest.

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

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

Policy 4 – Retaining Personal Information

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

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

5.2 Clients and partners 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. If the correction is not made, we will note the client or partner's correction request in the file.

Policy 6 – Securing Personal Information

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

- *use of locked filing cabinets;*
- *physically securing offices where personal information is held;*
- *the use of user IDs, passwords, encryption, firewalls; restricting employee access to personal information as appropriate;*
- *contractually requiring any service providers to provide comparable security measures*.

6.3 We will use appropriate security measures when destroying clients' and partners' personal information such as shredding documents and 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 Clients and Partners with Access to Personal Information

7.1 Clients and partners have a right to access their personal information, subject to limited exceptions, such as solicitor-client privilege, or when disclosure would reveal personal information about another individual.

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 clients and partners 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 client or partner of the cost and request further direction from the client or partner 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 client or partner in writing, providing the reasons for refusal and the recourse available to the client or partner.

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

8.1 The Privacy Officer **or designated individual** is responsible for ensuring ETSI-BC's compliance with this policy and the *Personal Information Protection Act.*

8.2 Clients and partners should direct any complaints, concerns or questions regarding ETSI-BC's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client or partner may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for ETSI-BC's Privacy Officer:

Stacy Smith, Controller
accounting@etsi-bc.ca

ETSI-BC Privacy Complaints Process

As part of our organization's Privacy Policy, ETSI-BC has established procedures to receive and respond to clients' or partners' privacy complaints, in order to:

- Address complaints quickly and effectively
- Identify and address any systemic or ongoing compliance problems
- Increase consumer confidence in our organization's privacy procedures
- Strengthen the good reputation of our organization
- Avoid complaints moving to the Information and Privacy Commissioner

The ETSI-BC Privacy Complaint Process:

- ***Who will receive and handle complaints*** – Please address all complaints to the ETSI-BC Privacy Officer.
- ***How we will handle complaints*** – Our Privacy Officer will
    - Acknowledge receipt promptly (within 2 business days)
    - Contact the individual to clarify the complaint, if required
    - Follow a fair, impartial and confidential process
- ***How we accept complaints*** – please email our Privacy Officer at accounting@etsi-bc.ca.
- ***How we inform customers about the process*** – our employees are able to explain our organization's privacy complaint process and identify who to contact to file a complaint. We will also inform clients and partners of their right to contact the Information and Privacy Commissioner if he or she is not satisfied with our organization's response to a complaint.
- ***How we document complaints*** – we will store any complaints received in a secure file on the ETSI-BC server, and include the date and
- ***How we ensure the process is impartial*** – our Privacy Officer will conduct the investigation of any complaints fairly and impartially. We will ensure that we follow all relevant conflict of interest policies. The Privacy Officer will be provided with access to all relevant records, employees or other individuals who handled the personal information involved.
- ***How we will correct any issues identified in the complaint*** – if the Privacy Officer determines that the situation requires remedial action, it will be carried out. This may include correcting practices and policies where necessary and communicating those changes to employees. We will document every decision made as the result of an investigation. We will notify the complainant of the outcome of our investigation and explain any corrections and preventative steps we've taken. We will verify that any required changes to policies, procedures or practices have occurred.