

GALIANO AFFORDABLE LIVING
INITIATIVE SOCIETY

PRIVACY POLICY

JUNE 2021

TABLE OF CONTENTS

1. Background, Purpose and Scope	3
2. Definitions	3
3. Accountability	4
4. Identifying Purposes	4
5. Consent	5
6. Limiting Collection	5
7. Limiting Use, Disclosure, and Retention	5
8. Accuracy	6
9. Safeguards	7
10. Openness and Individual Access	7
11. Challenging Compliance	7
12. Incident Reporting	8
13. Failure to Comply	8
14. Review	8

1. Background, Purpose and Scope

- 1.1. Galiano Affordable Living Initiative Society, (GALI), was incorporated as a non-profit society in March 2020.
- 1.2. GALI's goal is to "build and manage affordable rental housing for low and moderate income residents of Galiano Island."
- 1.3. As a not for profit organization registered as a society in British Columbia, GALI is subject to BC's *Personal Information Protection Act (PIPA)*.
- 1.4. The purpose of this Privacy Policy ("Policy") is to provide consistent standards to ensure that GALI Staff, as defined below, are aware of and acknowledge the obligations to protect Personal Information in the custody or under the control of GALI and in compliance with *PIPA*.
- 1.5. This Policy applies to all GALI Staff, for greater clarity including board members and volunteers, as well as to all Personal Information GALI collects regardless of format and how it is stored or recorded. This Policy applies to Staff while in the course of their duties for or on behalf of GALI, including when off-duty if working with Personal Information collected by GALI, and extends beyond the completion of their employment or other affiliation.
- 1.6. This Policy, together with the policies listed under Appendix A "Related Policies" demonstrates GALI's accountability for managing Personal Information and Confidential Information, and maintaining its trust-based relationship with clients, staff, businesses, organizations, government agencies, funding organizations and the public.
- 1.7. Questions or concerns about this Policy can be directed in confidence to galishousing@gmail.com.

2. Definitions

- 2.1. Personal Information, consistent with its meaning in PIPA, means information about an identifiable individual and includes employee personal information but does not include
 - 2.1.1. contact information, or
 - 2.1.2. work product information
- 2.2. Staff means any GALI employees, contractors, volunteers, board members or directors whether temporary or full time.

3. Accountability

- 3.1. GALI is accountable for its compliance with this Policy.
- 3.2. Responsibility for GALI's compliance with this Policy rests with the Staff responsible for day-to-day collection and processing of Personal Information.
- 3.3. All Staff members have a responsibility to ensure that appropriate steps are taken to protect Personal Information at all times. Staff members must ensure that their practices in collecting, accessing, using or disclosing Personal Information comply with this Policy, as well as with statutory requirements and their professional codes of practice.
- 3.4. GALI will make Staff aware of their duties and of the importance of maintaining confidentiality of Personal Information and other Confidential Information. As a condition of employment or affiliation, all new Staff must read the Privacy Policy and sign an appropriate Confidentiality Agreement (see Appendix B). Personal Information obtained in the course of a Staff member's employment or other affiliation with GALI must be held in confidence even after the employment relationship or affiliation comes to an end.

4. Identifying Purposes

- 4.1. GALI collects, uses and discloses Personal Information for purposes that relate to its mandate and are permitted under the PIPA.
- 4.2. These purposes include:
 - 1.1.1.1. Administration of membership
 - 1.1.1.2. Administration of donations
 - 1.1.1.3. Hiring and management of staff and volunteers including administration of related agreements
 - 1.1.1.4. Accepting and administering applications for tenancy
 - 1.1.1.5. Administration of housing-related agreements
- 1.2. GALI identifies the purposes for the collection of Personal Information prior to or at the time of collection whenever possible and legally required.
- 1.3. Where it collects Personal Information directly from the individual, GALI notifies the individual of the purposes for the collection prior to or at the time of collection.

2. Consent

2.1. Where appropriate, GALI collects the consent of individuals prior to the collection, use or disclosure of their Personal Information. For example:

2.1.1. GALI requests the consent of donors to collect their payment information on all fundraising forms

2.1.2. GALI requests the consent of candidates for the collection and use of the Personal Information during the hiring process.

2.1.3. GALI requests permission to send updates to members and those who request updates.

2.1.4. GALI requests the consent of housing applicants to collect their personal information on all application forms.

3. Limiting Collection

3.1. The collection of Personal Information by GALI is governed by *PIPA*.

3.2. GALI and its staff collect only the Personal Information required for the purposes identified.

3.3. GIRR collects Personal Information as needed to operate its programs and activities. GALI does not collect more Personal Information than is necessary to fulfill those purposes.

3.4. Wherever possible and appropriate, GALI collects Personal Information directly from the individuals it relates to, with their consent.

3.5. When Personal Information is collected by GALI directly from an individual, the individual will be provided notification and information advising them of:

1.1.1. the purpose for which the information is being collected and how it will be used;

1.1.2. the legal authority for collection; and

1.1.3. who to contact if the individual has any questions about the collection and use.

1.2. Personal Information may be collected indirectly (from sources other than the individual the information is about), by GALI, in the following circumstances:

1.2.1. with the consent of the individual;

1.2.2. as required for law enforcement purposes

1.2.3. as otherwise permitted by *PIPA*.

2. Limiting Use, Disclosure, and Retention

- 2.1. The Use, Disclosure and Retention of Personal Information by GALI is governed by *PIPA*.
- 2.2. GALI will not use or disclose Personal Information for purposes other than those for which it was collected or for purposes consistent with those purposes, except with the consent of the individual or as permitted by law.
- 2.3. The GALI Board must be consulted prior to the disclosure of Personal Information in any circumstance, and authorization must be received from the Board prior to disclosure.
- 2.4. GALI minimizes Staff's access to and use of Personal Information based on the "need to know" principle. Only those Staff who need to access the information to perform their duties are granted access.
- 2.5. GALI minimizes the amount of Personal Information used by Staff based on the "data minimization" principle, giving Staff access only to the least amount of Personal Information necessary to perform their duties.
- 2.6. GALI Staff shall take all reasonable measures to ensure no unauthorized personnel or third parties are allowed to use or disclose records containing Personal Information.
- 2.7. Unless the individual consents otherwise or it is required by law, Personal Information can only be used or disclosed for the purposes for which it was collected.
- 2.8. Personal Information must only be kept as long as required to serve the purposes for which it has been collected.
- 2.9. GALI will retain for a minimum of one year Personal Information that is used to make a decision that directly affects the individual the information is about.
- 2.10. GALI will use appropriate and reasonable disposal procedures to dispose of Personal Information. For example, paper documents will be shredded or cross-shredded. Electronic documents or communications will be deleted according to industry standards.

3. Accuracy

- 3.1. Personal Information must be as accurate, complete, and up-to-date as possible in order to properly satisfy the purposes for which it is to be used.

- 3.2. GALI Staff will therefore take all reasonable measures to ensure the accuracy and completeness of any Personal Information they collect or record, and be diligent to protect against making any errors due to carelessness or other oversights.
- 3.3. GALI will support requests by individuals to correct their Personal Information in GALI's custody.

4. Safeguards

- 4.1. Personal Information must be protected by appropriate security relative to the sensitivity of the information.
 - 1.1. GALI is committed to maintaining the security of Personal Information and other sensitive information, including the use of reasonable and appropriate physical, technical and administrative security for all data in its custody and control.
 - 1.2. As a condition of their employment, GALI Staff must comply with GALI security requirements. All Staff members have the responsibility to protect Personal Information against unauthorized collection, access, use, disclosure and disposal.
 - 1.3. GALI will conduct periodic reviews of its projects, initiatives, systems and programs to ensure that it continues to be compliant with legal, contractual and policy security requirements.

2. Openness and Individual Access

- 2.1. If appropriate, GALI will make certain information about its policies and procedures relating to the management and protection of Personal Information available through request or on its website.
- 2.2. GALI will handle requests from individuals for access to their Personal Information in accordance with *PIPA*.
- 2.3. GALI Staff are expected to comply with *PIPA* as well as all GALI policies, procedures and the Office of the Information and Privacy Commissioner's (OIPC) guidelines for the release of Personal Information via Part 7 of *PIPA*.
- 2.4. Any person in receipt of a request for access to information under *PIPA* must notify the GALI Board as soon as possible in order to ensure that statutory requirements and legal timelines are met.

3. Challenging Compliance

- 3.1. Concerns regarding GALI's compliance with this Policy may be sent directly to the GALI Board. All complaints will be investigated, and, if found to be justified,

appropriate measures will be taken, including amending policies and procedures where required.

- 3.2. Complaints may also be made to the Office of the Information and Privacy Commissioner for BC via telephone: (250) 387-5629 or email: info@oipc.bc.ca. General information about privacy law and compliance is available on the Office of the Information and Privacy Commissioner's website at <https://www.oipc.bc.ca/>.

4. Incident Reporting

- 4.1. GALI Staff are required to report any real or suspected breaches of this Policy in connection with any GALI program or activity. All reports must be made to the GALI Board.
- 4.2. All incidents involving theft or loss of Personal Information will be promptly addressed for containment, investigation, reporting and remedial actions.

5. Failure to Comply

- 5.1. Collection, access, use, and disclosure of Personal Information is monitored by GALI, and all suspected breaches of this Policy will be investigated by the GALI Board.
- 5.2. Failure to comply with this Policy may result in disciplinary action up to and including the loss of privileges, the termination of employment, and civil actions for damages.

6. Review

- 6.1. This Policy will be reviewed annually to ensure the principles and policies are relevant and reflect current legislation and best practices.

APPENDIX A: RELATED POLICY

GALI Website Privacy Policy