

The Victoria Horticultural Society Personal Information Protection Policy

The Victoria Horticultural Society (“The VHS”, “We”/”Our”) is committed to providing Members with exceptional service. Providing this service involves the collection, use and disclosure of some personal information about them, and protecting their personal information is one of our highest priorities.

While we have always respected our Members’ 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 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 in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting Members’ personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our Members’ personal information and allowing them to request access to, and correction of, their personal information.

Definitions

The VHS means the Victoria Horticultural Society and any of its sub-groups.

Personal Information means information about an identifiable individual (e.g., name, home address and phone 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 responsible for ensuring that The VHS 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 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.

Policy 2 – Consent

- 2.1 We will obtain Members' 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 or 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 Member voluntarily provides personal information for that purpose.

- 2.3 Consent may also be implied where a Member is given notice and a reasonable opportunity to opt out of having their personal information used for mail-outs, the marketing of new services or products or fundraising, and the Member 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 withholding or withdrawal of consent would frustrate the performance of a legal obligation), Members can withhold or withdraw their consent for The VHS to use their personal information in certain ways. A Member'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 in making the decision.
- 2.5 We may collect, use or disclose personal information without the Member'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.

Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only collect, use or disclose Members' 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 deliver products and services (e.g., meeting notices, newsletters, programming);
 - To contact our Members for fundraising;

- To conduct Member surveys in order to enhance the provision of our services;
- To contact a Member directly about services that may be of interest;
- To ensure a high standard of service to our Members.

3.3 We will not use or disclose Members' personal information for any additional purpose unless we obtain consent to do so.

3.4 We will not disclose Member lists or personal information to other parties.

Policy 4 – Transfer Of Data

4.1 Members' information, including Personal Information, may be transferred to – and maintained on – computers located outside of British Columbia, where the data protection laws may differ from those of your jurisdiction.

4.2 Consent to this Privacy Policy, followed by submission of the information described, represents a Member's agreement to that transfer. The VHS will take all steps reasonably necessary to ensure that Members' data is treated securely and in accordance with this Privacy Policy, and no transfer of Members' Personal Information to another organization or country will take place unless there are adequate controls in place regarding the security of the data and other personal information.

Policy 5 – Retaining Personal Information

5.1 If we use a Member's personal information to make a decision that directly affects the Member, we will retain that personal information for at least one year so that the Member has a reasonable opportunity to request access to it.

5.2 Subject to policy 4.1, we will retain Members' personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

Policy 6 – Ensuring Accuracy of Personal Information

- 6.1 We will make reasonable efforts to ensure that a Member's personal information is accurate and complete where it may be used to make a decision about the Member or disclosed to another organization.
- 6.2 Members 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. A request to correct personal information should be forwarded to the Privacy Officer [or designated individual].
- 6.3 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 correction request in the file.

Policy 7 – Securing Personal Information

- 7.1 We are committed to ensuring the security of Members' personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 7.2 The following security measures will be followed to ensure that Members' personal information is appropriately protected:
- Restricting access to those members of the Executive (or designated individuals) who need to contact a Member in order to provide the requested products or services
 - The use of user IDs and/or passwords to allow access to our Members' personal information
- 7.3 We will use appropriate security measures when destroying Members' personal information, such as shredding documents and deleting electronically stored information.

- 7.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 8 – Providing Members Access to Personal Information

- 8.1 Members have a right to access their personal information, subject to limited exceptions (for example, where disclosure would reveal personal information about another individual).
- 8.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.
- 8.3 Upon request, we will also tell Members how we use their personal information and to whom it has been disclosed, if applicable.
- 8.4 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.
- 8.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the Member of the cost and request further direction from the Member on whether or not we should proceed with the request.
- 8.6 If a request is refused in full or in part, we will notify the Member in writing, providing the reasons for refusal and the recourse available to the Member.

Policy 9 – Questions and Complaints: The Role of the Privacy Officer or designated individual

- 9.1 The Privacy Officer (or designated individual) is responsible for ensuring The VHS complies with this policy and the Personal Information Protection Act.
- 9.2 Members should direct any complaints, concerns or questions regarding The VHS's compliance in writing 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.

The Privacy Officer or designated individual for The VHS is the President, who may be contacted at president@vichortsociety.org.