



# Central Kootenay Invasive Species Society

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## **POLICY: Privacy**

### **1. Background:**

The Central Kootenay Invasive Species Society (the "Society") recognizes the value of its relationships with funders, members, volunteers and employees, and is committed to respecting and protecting their personal information. We value the trust of those we deal with, and of the public, and recognize that maintaining this trust requires transparency and accountability in our treatment of the information that is entrusted in us.

To meet these goals, the Society complies with the **British Columbia Personal Information Protection Act (PIPA) and the federal Personal Information Protection and Electronic Documents Act (PIPEDA)**. Our privacy policy adheres to the 10 principles that comprise the Canadian Standards Association Model Privacy Code and form the basis of this legislation.

#### Definition of Personal Information

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. Personal information does not include the business contact information of an individual.

### **2. Accountability**

**An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.**

- a. Accountability for the Society's compliance with privacy legislation rests with the designated Privacy Officer. The name and contact information of the Privacy Officer will be made available to interested individuals through the Society's website, this policy or upon enquiring of the Society's staff.
- b. We are responsible for personal information in our possession, including information that has been transferred to a third party for processing. In cases where such transfers take place we ensure that the third party has comparable privacy safeguards in place.

### **3. Identifying Purposes**

**The purposes for which personal information is collected shall be identified by the Society when or before the information is collected.** The purposes will be limited to those which are related to our business and which a reasonable person would consider to be appropriate in the circumstances. We collect personal information concerning our employees, funders, potential funders, volunteers, land owners/land managers, members of the public and CKISS members for the following reasons:

- a. To provide them with information about how donated funds are used by the Society;
- b. To keep them informed about the Society's activities;
- c. To promote opportunities for them to support the Society;
- d. To build and maintain relationships;
- e. To appropriately acknowledge and steward the gifts of funders;
- f. To comply with legal requirements;
- g. To protect against fraud;
- h. To plan and conduct invasive species management programs;
- i. To respond effectively to public inquiries;
- j. To carry out appropriate human resource management.

## 4. Consent

**The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except where inappropriate or where specified under PIPA.**

- a. The principle requires "knowledge", and the Society will make a reasonable effort to ensure that individuals know - are aware of - the purposes for which information is collected at the time of collection.
- b. The manner in which the Society obtains consent for the collection of personal information varies with the sensitivity of the information being collected. PIPA makes provision for different kinds of consent depending on the situation: express and deemed consent, as well as consent by not declining consent (by not opting out). Individuals can give consent to the Society:
  - i. In writing, such as when completing an online donation form or signing a Memorandum of Support to become a Member;
  - ii. Through an opt-out-process, either by checking off a box on a response form or by contacting the Society;
  - iii. Orally, either in person or by telephone.
- c. Individuals may withdraw consent at any time, by any means, with reasonable notice to the Society. This notice period will not exceed one month.
- d. The Society may collect, use and disclose personal information without consent if that information is considered by law to be in the public domain. Sources of public information include telephone and professional directories, newspapers, periodicals and public registries.

## 5. Limiting Collection

**The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.**

The Society will not collect information indiscriminately. It is limited to that which is necessary and reasonable to fulfill the purposes identified in "3. Identifying Purposes". The Society will collect personal information by lawful means and will not mislead individuals about the purposes for which information is being collected. Types and means by which information is collected by the Society include:

- a. Information collected automatically from the Society's website and social media accounts
  - i. The internet protocol address and domain name used. The internet protocol address is a numerical identifier assigned either to the individual's internet service provider or directly to the individual's computer. This address can be translated to determine the domain name of the individual's service provider (e.g. ckiss.ca);
  - ii. The type of browser and operating system;
  - iii. Date and time of the visit; and
  - iv. The web pages or services accessed.
  - v. The Society's website uses Google Analytics to track usage of our website for reporting and evaluation purposes. Google Analytics uses first-party cookies to report on user interactions on Google Analytics customers' websites. These cookies are used to store non-personally identifiable information. Browsers do not share first-party cookies across domains. For further information on the privacy policy concerning Google Analytics, please see <http://www.google.com/analytics/learn/privacy.html>.
- b. Information collected directly from an individual
  - i. The Society will collect and record personal information provided to us by individuals through correspondence, conversations, meetings, conferences, donations, and other forms of communications.
- c. Information collected from public sources

These types of information and means of collection are not intended to be an exhaustive list, and the Society may collect other information about an individual from time to time as is consistent with the purposes identified in "3. Identifying Purposes".

## 6. Limiting Use, Disclosure and Retention

**Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.**

- a. The Society does not sell, rent or trade mailing lists.
- b. When the Society uses personal information for purposes other than those given at the time of collection, consent will be obtained for these purposes.
- c. Personal information is disclosed only to third parties who have signed an agreement binding them to the Society's privacy policies.
- d. The Society will not use electronic information to determine an individual's identity unless required to do so as a part of an internal investigation or other law enforcement purpose, nor will the Society disclose personal information to third parties unless required to do so by law.
- e. Personal information will be retained as long as the purpose for which the information was originally collected remains valid.

## 7. Accuracy

**Personal information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.**

The Society will use its best efforts to ensure that information that is used on an ongoing basis, including information that is disclosed to third parties, and information that is used to make a decision about an individual (such as a giving recognition category) is accurate, complete and up-to-date.

## 8. Safeguards

**Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.**

- a. The Society is obligated to protect individuals' personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal. Security measures have been integrated into the day-to-day operating practices of the Society.
- b. We will make our employees aware of the importance of maintaining the confidentiality of personal information, and will exercise care in the disposal and destruction of personal information to prevent unauthorized parties from gaining access to it. All employees and volunteers having access to personal information are required to sign an oath of confidentiality.
- c. Our methods of protection include physical measures (e.g. locked filing cabinets, restricted access to offices), organizational measures (e.g. security clearances as appropriate and limiting access to a 'need-to-know' basis) and technological measures (e.g. use of security passwords and encryption).
- d. Third parties are expected to safeguard personal information entrusted to them in a manner consistent with the policies of the Society and are required to sign a confidentiality agreement as part of all contracts if they do not have comparable privacy safeguards in place. Examples of third parties include mailing and photocopy services, payroll services, subcontractors and data analysis providers.

## 9. Openness

**The organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.**

- a. The Society is open about privacy policies and procedures concerning the management of personal information and makes them readily available in a form that is generally understandable.
- b. The information made available includes:
  - i. The name or title and contact information of the Privacy Officer who is accountable for compliance with the Society's policies and procedures, and to whom complaints or inquiries can be forwarded;
  - ii. The means of gaining access to personal information held by the Society;
  - iii. A description of the types of personal information held by the Society;
  - iv. A copy of any document that explains the Society's policies, procedures, standards or codes; and
  - v. The types of information made available to third parties.

## 10. Individual Access

**Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.**

- a. The Society will respond to an individual's request within a reasonable length of time, but no longer than one month. While our response will typically be provided at no cost to the individual, depending on the nature and amount of information involved, we reserve the right to impose a fee to recover our costs.
- b. The requested information will be made available in a form that is generally understandable. For example, where the Society uses abbreviations or codes to record information an explanation of those codes will be provided.
- c. For the Society to provide an account of the existence, use and disclosure of personal information, an individual may be asked to provide additional information to aid in the search. The additional information provided will be used only for this purpose.
- d. Upon request, the Society will provide specific information about third parties to whom personal information has been disclosed.
- e. When an individual successfully demonstrates the inaccuracy or incompleteness of personal information, the Society will amend the information as required. Where appropriate, the amended information will be transmitted to third parties having access to the information in question.
- f. Individuals may review the personal information the Society has recorded for that individual and only that individual. Individuals may also provide written permission to the Society to permit another individual to review the personal information the Society has recorded for that individual but only for that individual.

## 11. Challenging Compliance

**An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.**

- a. The name of the Privacy Officer will be known to staff.
- b. The Society will maintain procedures to receive and respond to complaints or inquiries about its policies and practices relating to the handling of personal information. The complaint procedures will be straightforward.
- c. Individuals who make inquiries or lodge complaints will be given information by the Society of the existence of relevant complaint procedures.
- d. If a complaint is found to be justified, the Society will take appropriate measures, including revision of the personal information, and, if necessary, amendment of the Society's policies and practices.
- e. The Privacy Officer will report all complaints or challenges under this policy to the Finance and Fundraising Committee.

## 12. Policy Violations

Any individual, including CKISS employees and volunteers, who fails to comply with this policy will be subject to disciplinary actions, up to and including termination of employment or volunteer relationship. Examples of violations of this policy include, but are not limited to:

- a. Accessing information that is not required for job purposes
- b. Misusing, disclosing without proper authorization, or altering member information
- c. Disclosing one's password for accessing electronic records to another person/
- d. Disclosing how to access any info to an unauthorized person as defined in section 8 (not having signed confidentiality oath).

## Policy Review

This policy will be reviewed every 3 years or more frequently as required.

## How to contact the Privacy Officer

Inquiries, complaints or access requests should be addressed to: Privacy Officer, Central Kootenay Invasive Species Society, Suite 19-622 Front Street, Nelson, BC V1L 4B7; Email: [info@ckiss.ca](mailto:info@ckiss.ca), Subject: Privacy

<b>Revisions</b>		
<b>Rev #</b>	<b>Date</b>	<b>Description</b>
1	<b>2020/02/22</b>	Originally approved by Board of Directors
2	<b>2022/02/23</b>	Reviewed and approved by Board of Directors