

PARKINSON WELLNESS PROJECTS (PWP)

Personal Information Protection Policy

PWP is committed to protecting the privacy of its program participants, members, employees, volunteers and contractors who are individuals including complying with the applicable privacy legislation, being the BC *Personal Information Protection Act*.

In accordance with the applicable law, this policy outlines the principles and practices PWP will follow in protecting the personal information of its program participants, members, employees, volunteers and contractors who are individuals.

Definitions

personal information means information about an identifiable individual in the custody or control of PWP that is not “contact information” or “work product information”, as defined in the *PIPA*. Personal information can include an individual’s medical or financial information as well as their home address, phone number and email address.

PIPA means the *Personal Information Protection Act* (BC) and includes any applicable regulations or other enactments made under that Act.

Privacy Officer means PWP’s Program and Education Manager or such other individual as may be designated from time to time by PWP’s board of directors to be responsible for ensuring that PWP complies with this policy and the *PIPA*.

Policy 1 - Collecting Personal Information

1.1 Unless the purpose for collecting the personal information is obvious and the individual the information is about voluntarily provides the information for that purpose, PWP will communicate to the person the purpose for which personal information is being collected by PWP, either orally or in writing, before or at the time of collection.

1.2 PWP will only collect personal information that fulfills one or more of the following purposes:

- To verify identity;
- To hire, retain and manage employees or contractors;
- To solicit and manage volunteers;
- To identify client, member or volunteer preferences (e.g. types of services or activities);
- To understand the needs of PWP’s program participants, members, employees, contractors or volunteers;

- To manage membership, donations, service activities (exercise, education, fundraising and awareness campaigns);
- To protect the health and safety of program participants;
- To deliver requested programs and services;
- To manage newsletter subscriptions;
- To provide program services (consultation, counselling, education, support);
- To enrol the client in a program (exercise, information workshop);
- To send out membership information;
- To contact PWP program participants, members or volunteers for fundraising;
- To ensure a high standard of service to PWP program participants;
- To meet legal and regulatory requirements;
- To collect and process payments;
- To otherwise further the purposes of PWP as set out in its constitution.

Policy 2 – Consent

2.1 PWP will obtain consent from the individual the information is about to collect, use or disclose personal information except where PWP is authorized by the *PIPA* to do so without consent.

2.2 Consent can be provided orally (in person or telephone), in writing, electronically (email or other electronic means), or it can be implied where the purpose for collecting, using or disclosing the personal information is obvious and the individual the information is about voluntarily provides the information for that purpose.

2.3 Consent may also be implied where an individual is given notice and a reasonable opportunity to opt out of their personal information being used for the purpose or purposes set out in the notice and that individual does not opt out within a reasonable period.

2.4 Subject to exceptions set out in the *PIPA*, individuals can withhold or withdraw their consent for PWP to collect, use or disclose their personal information in certain ways. Those exceptions include where the personal information is necessary to provide a service being provided to the individual the information is about, or the withdrawal of consent would frustrate the performance of a legal obligation. In a situation where an individual's decision to withhold or withdraw their consent to the collection, use or disclosure of their personal information may restrict PWP's ability to provide a particular program or service, PWP may provide relevant and accurate information to assist the individual to make the decision.

2.5 PWP may collect, use or disclose personal information without the knowledge or consent of the individual the information is about only in the circumstances permitted or required by the *PIPA* or other applicable law.

Policy 3 - Using and Disclosing Personal Information

3.1 PWP will only use or disclose personal information where necessary to fulfill the purposes identified at the time of its collection except with the consent of the individual the information is about or unless the use or disclosure is otherwise permitted or required by the *PIPA* or other applicable law.

3.2 PWP will not sell lists of its members, program participants or donors to other parties.

Policy 4 - Retaining Personal Information

4.1 If PWP uses personal information to make a decision that directly affects the individual the information is about, PWP will retain that information for at least one year so the individual has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, PWP will retain personal information only as long as necessary to fulfill the purpose for which it was collected or for another legal or business purpose.

Policy 5 - Ensuring Accuracy of Personal Information

5.1 PWP will make reasonable efforts to ensure that personal information it collects is accurate and complete where it is likely to be used to make a decision that affects the individual the information is about or to be disclosed to another organization.

5.2 Individuals may request PWP to correct errors or omissions in their personal information to ensure its accuracy and completeness. A request to correct personal information must be made in writing and directed to the Privacy Officer and provide sufficient detail to identify the personal information and the correction being sought.

5.3 Upon receiving a request under policy 5.2, if the Privacy Officer is satisfied based on reasonable grounds that the personal information has been demonstrated to be inaccurate or incomplete, the Privacy Officer will correct the information as soon as reasonably possible and send the corrected information to any organization to which PWP may have disclosed the personal information in the previous year. If no correction is determined to be necessary by the Privacy Officer after a request for correction has

been made, the Privacy Officer will annotate the file containing the information to show the correction request and that the requested correction was not made.

Policy 6 - Securing Personal Information

6.1 PWP will take reasonable measures to ensure the security of personal information to protect it from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks. Those measures may include : the use of locked filing cabinets; physically securing offices where personal information is held; the use of user IDs, passwords, encryption, firewalls on PWP's computer network; restricting access to personal information as appropriate (i.e., only those that need to know will have access; contractually requiring any service providers to provide comparable security measures).

6.2 PWP will also use appropriate security measures when destroying personal information such as shredding documents and deleting electronically stored information.

6.3 PWP will review and update its security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 - Providing Access to Personal Information

7.1 Individuals have a right to access their personal information, subject to limited exceptions set out in the *PIPA*.

7.2 A request by an individual to access their personal information must be made in writing to PWP directed to the Privacy Officer and provide sufficient detail to identify the individual and the personal information being sought.

7.3 Upon request, PWP will also tell individuals how PWP uses their personal information and to whom it has been disclosed if applicable and subject to any applicable exceptions in the *PIPA*.

7.4 PWP will make requested personal information available within 30 business days of the request or provide written notice of an extension where additional time is required to fulfill the request.

7.5 If a request is refused in full or in part, PWP will notify the requesting individual in writing, providing the reasons for the refusal and the recourse available to the individual.

Policy 8 - Questions and Complaints: The Role of the Privacy Officer

8.1 The Privacy Officer is responsible for ensuring PWP's compliance with this policy and the *PIPA*.

8.2 Individuals should direct any complaints, concerns or questions regarding PWP's compliance with this Policy or the *PIPA* in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the matter, the individual may also write to the Information and Privacy Commissioner of British Columbia.

8.3 Contact information for the Privacy Officer is Bailey Martin, Program and Education Manager, Parkinson Wellness Projects, 202-2680 Blanshard Street, Victoria, British Columbia, V8T 5E1; Phone 250-360-6800; E-mail bailey@parkinsonwellnessproject.org or as otherwise posted on PWP's Website.

8.4 PWP is committed to ensuring the individual designated as the Privacy Officer has appropriate training to perform the responsibilities of that role.

Policy 9 – Publication of this Policy

9.1 This Policy, as may be revised or replaced from time to time, is to be posted on PWP's Website and also made available to anyone requesting a copy of it.