



Science Advisory Board for Contaminated Sites in British Columbia

POLICY 5: Protection of Personal Information (Privacy)

This policy uses a first person format and wording consistent with other similar policies in force at the University of Victoria.

We, the Science Advisory Board for Contaminated Sites in British Columbia understand that you, our members and stakeholders, will want to know that information we obtain about you is collected, used or disclosed by us responsibly and in accordance with our obligations under the law to maintain your rights to privacy.

We intend this Policy to set out the principles we use to protect the privacy of those whose personal information we acquire or hold and to inform you about how we discharge our obligations to you in the collection, use and disclosure of your personal information; how you may obtain further information about our policies and procedures; and how you may access or correct your personal information.

This Policy is based on the CSA Model Code for the Protection of Personal Information and should be interpreted in accordance with its principles and commentary.

In the Policy, we use the following terms that have the meanings set out below:

Collection means the act of gathering, acquiring or obtaining personal information from any source, including third parties, by any means.

Consent is voluntary agreement with what is being done or proposed. Express consent is an unequivocal assent given either orally or in writing. Implied consent arises where consent may be reasonably inferred from action or inaction of a person.

Disclosure means making personal information available to others outside our organization.

Personal Information means information about an identifiable individual but does not include that person's name, business title, business address or business phone number.

Use refers to how our organization treats and handles personal information.

Section 1: How We Are Accountable

1. We are responsible for personal information under our control. Our staff will carry out this obligation as required by this Policy and as required by the internal procedures and protocols that we have developed to handle personal information.



2. We have appointed a Privacy Officer. The name and contact information for this person is available to you upon request.
3. Our Privacy Officer is responsible for our compliance with the laws regulating the collection, use and disclosure of personal information. Our Privacy Officer will implement and monitor our policies and practices for handling personal information; ensure the staff who perform the day-to-day operations are trained appropriately; answer inquiries from you about privacy; and respond to any complaints about privacy issues.
4. The Privacy Officer may delegate some of her or his duties to other appropriate people in the organization from time to time.

Section 2: Why We Collect Personal Information

1. The purposes for which our organization exists and the functions it performs require us to collect and use some personal information. We are responsible for identifying and documenting those purposes and only collecting personal information reasonably needed to fulfill them. For example, to make it possible to contact you and maintain the services to you which you expect, we need to have your mailing address (home or business ,and electronic). Application for membership requires that we understand your credentials and experience.
2. Usually we will inform you of the purposes for which we are collecting personal information at the time we collect it. We will explain those purposes more fully to you if you request a more detailed explanation. We will try to state the purposes in a way that is clear and understandable.
3. If we decide that we need to use your personal information for a different purpose other than those you were aware of when we collected the personal information, we will not do so without your consent unless the law permits or requires us to use the information without your consent (For example when you are an officer of the Society, as required under the Societies Act).

Section 3: Your Consent

1. When personal information is required, we will ask for your consent to collect, use or disclose that information for the purposes we identify. Your consent may be given orally or in writing. How we seek your consent will depend upon the sensitivity of the information.
2. In some cases, the purposes for which we are collecting the information will be obvious to any reasonable person. In that case, if you supply the information, you will be deemed to have consented to its collection and use for those purposes.



3. In other cases, we may provide you with a notice of why we are collecting the information and how we intend to use or disclose it. If you do not object to the collection, use or disclosure of the information, you will be deemed to have consented to its collection, use or disclosure for those purposes.

4. You have the right to withdraw your consent to our collection, use or disclosure of your personal information at any time by giving notice to our Privacy Officer, except where doing so would break a legal obligation. We will inform you of the likely consequences of your withdrawing your consent and we have the right to require a reasonable notice period from you before we stop the collection, use or disclosure of the personal information.

Section 4: Limits on Our Collection

1. We will not collect personal information that is not reasonably necessary to fulfill the purposes for which we are collecting it.
2. We will inform you of the type of information we collect and how and why we collect it upon your request.

Section 5: Limits on Our Use, Disclosure and Retention

1. We will not use nor disclose your personal information for purposes other than those for which it was collected except with your consent or as permitted or required by law.
2. We will not retain your personal information for any longer than it is needed and, when it is no longer needed, we will make reasonable efforts to destroy or erase it promptly.
3. If we have used personal information to make a decision about you, we will retain that information for a minimum period of six months in order to allow you access to the information.

Section 6: Accuracy

1. Depending upon the nature of the personal information and the use to which it will be put, we will take reasonable steps to ensure that the personal information is accurate, complete and up-to-date. Where you are aware of any changes to your personal information that we should know about, it is your responsibility to notify us of those changes.
2. We will only update information routinely where such updating is needed to fulfill the purposes for which we collected the information.

Section 7: Safeguards



1. Our employees are aware of the importance of protecting personal information that we hold.
2. Depending upon the type of information, its sensitivity and its method of storage, we will take all reasonable precautions against loss, theft, unauthorized access, disclosure, copying, use, or modification of personal information.
3. Our safeguards include appropriate physical security measures restricting access to offices and filing cabinets and appropriate use of computer passwords and encryption.
4. When we destroy personal information, we will take reasonable precautions to assure that the information is not available to unauthorized parties.
5. If you communicate with us by email or wireless communications, you should be aware that complete confidentiality and security are not assured and such confidentiality and security are beyond our control.

Section 8: Information About Our Practices

1. We will make available to you further information about our policies and procedures regarding the handling of personal information upon request unless providing you with that information would jeopardize our security measures.
2. We will provide you with the name and contact information for our Privacy Officer upon request. The Privacy Officer can inform you as to how you can gain access to your personal information and about what type of personal information we hold and how generally we use it. The Privacy Officer can also deal with complaints or other information requests that you may have.

Section 9: Your Access

1. Upon your request, we will inform you of any personal information that we hold about you and allow you access to your own personal information unless we are prevented from doing so by law or we are exempted from disclosing it by statutory provision.
2. We will also tell you about any use that we are making or have made of your personal information and the names of any organizations to which we have disclosed it.
3. We will make all reasonable efforts to provide this information promptly and at a minimal charge.
4. In order to access your personal information, we may require you to provide us with personal information to enable us to retrieve the relevant information. We will not use this personal information for any purpose other than retrieval of your personal information to which you have requested access.



5. Our Privacy Officer may require your request to be in writing and to give details of the information you are seeking.
6. If you believe that your personal information is inaccurate, you may ask us to amend the information and to inform any organization to which we have disclosed the information of the amendment.
7. We will amend personal information where our Privacy Officer determines that the information is inaccurate. If our Privacy Officer is not convinced that the information is inaccurate, we may refuse to amend the information. In that case, we will record the challenge to the information with the personal information and will notify any organization to which we have disclosed the challenged information of the challenge.

Section 10: Complaints

1. If you have a complaint about any of our practices or procedures under this Policy or relating to the collection, use or disclosure of personal information you should make the complaint to the Privacy Officer.
2. The Privacy Officer may require the complaint to be made in writing.
3. The Privacy Officer will investigate your complaint. The Privacy Officer may delegate the investigation process to another person where the delegation is reasonable.
4. The Privacy Officer will inform you about the outcome of the investigation. Where the Privacy Officer finds your complaint to be justified, we will take appropriate measures as recommended by the Privacy Officer to remedy the complaint.