

PRIVACY POLICY

THE AIR CADET LEAGUE OF CANADA, BRITISH COLUMBIA PROVINCIAL COMMITTEE

Our Commitment To Privacy

The Air Cadet League of Canada, British Columbia Provincial Committee is committed to maintaining the security, confidentiality and privacy of personal information of any identifiable individual which information is under its control. The Air Cadet League of Canada, British Columbia Provincial Committee has always respected such privacy and remains committed to do so in the future. The Air Cadet League of Canada, British Columbia Provincial Committee has produced the following written Privacy Policy to document its on-going commitment to protect the privacy of all information which is, or in the future comes within, its control, respecting identifiable individuals involved with the air cadet movement. This Privacy Policy has been developed to ensure The Air Cadet League of Canada, British Columbia Provincial Committee complies with the requirements of the British Columbia *Personal Information Protection Act (PIPA)*.

Scope Of Privacy Policy

This Privacy Policy applies to The Air Cadet League of Canada, British Columbia Provincial Committee. This Privacy Policy addresses personal information about identifiable individuals and does not apply to the information collected, used or disclosed with respect to corporate or commercial entities.

Although The Air Cadet League of Canada, British Columbia Provincial Committee, may chose to protect the privacy of personal information that is not protected by *PIPA*, this Privacy Policy does not impose any limits on The Air Cadet League of Canada, British Columbia Provincial Committee with respect to the collection, use or disclosure of personal information which is not protected by *PIPA*, examples of which include the following types of personal information:

- business contact information which means information to enable an individual at a place of business to be contacted, such as the name, title or position of the individual, business telephone number, business address, business email or business fax number of the individual;
- information which *PIPA* deems there to be consent for such as the collection, use and disclosure of information that is voluntarily provided by an individual and at the time it is provided the purpose would be considered to be obvious to a reasonable person;
- publicly available information recognized under *PIPA*, such as the name, address, telephone number and other personal information of a subscriber that appears in a telephone directory or is available through directory assistance, if the directory or directory assistance service is available to the public and the subscriber is permitted to refuse to have his personal information included in the directory or made available by directory assistance.

Definitions

In this Policy:

The Air Cadet League of Canada, British Columbia Provincial Committee means The Air Cadet League of Canada, British Columbia Provincial Committee hereinafter known as BCPC.

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

"consent" means voluntary agreement to the collection, use and disclosure of personal information for specified purposes. Consent may be express or implied. Express consent can be given orally or in writing, it is unequivocal and does not require any inference on the part of BCPC. Implied consent exists when BCPC can reasonably infer consent based upon your action or inaction.

"disclosure" means making personal information available to a third party.

"personal information" means information about an identifiable individual but does not include business contact information of an individual. Personal information does not include information that is about corporate or commercial entities. It also does not include information that cannot be associated with a specific individual.

"PIPA" means the British Columbia *Personal Information Protection Act* S.B.C. 2003, c.63, as amended from time to time.

"third party" means an individual or organization other than BCPC and you.

"Privacy Officer" means an individual designated by BCPC who is responsible for BCPC compliance with this Privacy Policy and who can be contacted as set out in this Privacy Policy.

"use" means the treatment and handling of personal information by and within BCPC.

Our Ten Privacy Principles

1. Accountability

BCPC is responsible to protect the personal information under its control. BCPC has designated a Privacy Officer who is responsible for BCPC compliance with this Privacy Policy.

The Privacy Officer for BCPC is its Secretary who may delegate such duty to another individual and accordingly, such other individual may be responsible for the collection, use and disclosure of personal information. Should such delegation of duty occur the position name or title of such other individual will be made available to the public.

The Secretary of BCPC may be contacted at:

The Air Cadet League of Canada, British Columbia Provincial Committee,
#2-7630 Montreal Street, Delta, BC V4K 0A7
Phone: 604 – 732 – 9119; Fax 604 – 732 – 9115
Email: bcpc@aircadetleague.bc.ca

BCPC has and will continue to adopt and approve procedures to protect personal information, receive and respond to complaints and inquiries, train staff regarding policies and procedures and communicate policies and procedures to you.

2. Purposes

BCPC collects, uses and discloses your personal information for the following reasons:

- to ensure that in the process of selecting individuals to be involved with the air cadet movement, that individuals are selected who are best suited to make such a contribution. It is important in this selection process to ascertain an individual's previous volunteer activities, as well as any special skills such individual will bring to the air cadet movement. In addition, when an individual is selected for a position of trust such as direct involvement with air cadets, carrying out fundraising activities or being responsible for BCPC's funds, it is important that the individual possess the appropriate skills for such a position. All individuals, will, in addition to providing BCPC with details such as names, addresses and phone numbers, be required to provide BCPC with a criminal record check to ensure the integrity of BCPC and the air cadet movement as a whole;
- to enable BCPC to provide and administer services needed and requested not only within BCPC but with other organizations involved with the air cadet movement, such as the Department of National Defence, the Air Cadet League of Canada, other Provincial Committees, the Sponsoring Committees in British Columbia and all of the suppliers of equipment and facilities, all with the intent to ensure the facilitation, support, promotion and carrying out the programs of The Air Cadet League of Canada within the Province of British Columbia;
- to comply with legal and regulatory requirements;

To carry out its purposes, BCPC may be required to share personal information with third parties, such as those referred to above.

You may instruct BCPC to refrain from collecting, using or disclosing your personal information in the ways described above at any time by providing written notification to the BCPC Privacy Officer.

When personal information that has been collected is to be disclosed for a purpose not previously identified, the new purpose shall be identified prior to disclosure and consent for same shall be obtained from you unless the use is authorized or required by *PIPA* or other laws.

3. Consent

BCPC will obtain your consent to collect, use or disclose personal information except where BCPC is authorized or required by *PIPA* or other laws to do so without consent or where consent is deemed to have been obtained. For example, BCPC may collect, use or disclose personal information without your knowledge or consent where:

- BCPC is collecting information that is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- BCPC is required or authorized by law to collect the information;
- BCPC reasonably expects that collection with consent would compromise the availability or accuracy of the personal information and the collection is reasonable for an investigation or proceeding; or
- BCPC requires the information for the medical treatment of the individual and the individual is unable to give consent.

Your consent can be expressed, implied, deemed, written or verbal and given through an authorized representative such as an attorney, representative under a Representation agreement, guardian, lawyer or other agent.

Consent may be provided through inaction, such as when you fail to notify BCPC that you do not wish your personal information collected, used or disclosed following reasonable notice that BCPC intends to do so.

You may withdraw consent at any time, subject to legal or contractual restrictions, provided that reasonable notice of withdrawal of consent is given to BCPC. On receipt of notice of withdrawal of consent, BCPC will inform you of the likely consequences of the withdrawal of consent, which may include the inability of BCPC to provide certain services for which that information is necessary.

4. Limits On Collection Of Personal Information

BCPC will limit collection of information to that which is reasonable and necessary to carry out its purposes and which is reasonable and necessary for the purposes consented to by you. BCPC will also collect information as authorized or required by *PIPA* or other laws.

5. Limits For Using, Disclosing And Retaining Personal Information

Personal information will only be used or disclosed for the purposes set out above and as authorized by *PIPA* and other laws.

BCPC will keep personal information used to make a decision affecting an individual for a minimum of at least one year after using it to make a decision.

BCPC will destroy, erase or make anonymous documents or other records containing personal information as soon as it is reasonable to assume that the original purpose is no longer being served by retention of the information and retention is no longer necessary for legal or business purposes.

BCPC will take due care when destroying personal information so as to prevent unauthorized disclosure of the information.

6. Accuracy

BCPC will make a reasonable effort to ensure that personal information it has collected or is using or disclosing is accurate and complete. In some cases, BCPC relies on the individual to ensure that certain information, such as an address or telephone number, is current, complete and accurate.

If you demonstrate the inaccuracy or incompleteness of personal information, BCPC will amend the information as required. If appropriate, BCPC will send the amended information to third parties to whom the information has been disclosed.

When a challenge regarding the accuracy of personal information is not resolved to your satisfaction, the Privacy Officer will annotate the personal information under its control with a note that the correction was requested but not made.

7. Safeguarding Personal Information

BCPC protects the personal information in its custody or control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

BCPC will take reasonable steps, through contractual or other reasonable means, to ensure that a comparable level of personal information protection is implemented by its suppliers and agents who work with BCPC. Some specific safeguards include:

- physical measures such as locked filing cabinets;
- organizational measures such as restricting employee access to files and databases as appropriate;
- electronic measures such as passwords and firewalls;
- regular reviews of processes in place to safeguard personal information; and
- investigative measures where BCPC has reasonable grounds to believe that personal information is being inappropriately collected, used or disclosed.

Confidentiality and security are not assured when information is transmitted through e-mail, fax or other wireless communication. BCPC will not be responsible for any loss or damage suffered as a result of a breach of security and/or confidentiality when information is transmitted to BCPC by e-mail, fax or other wireless communication or when BCPC transmits such information by such means at an individual's request.

8. Openness

BCPC is open about the policies and procedures it uses to protect personal information. Information about these policies and procedures will be made available in writing and electronically. However, to ensure the integrity of our security procedures and business practices, BCPC will not disclose sensitive information about its policies and procedures.

Upon request, BCPC will make available a description of the type of personal information held by BCPC, and a general description of its use and disclosure.

9. Providing Access

You have a right to access your personal information held by BCPC.

Upon written request and authentication of identity, BCPC will provide you with your other personal information under its control, information about the ways in which that information is being used and a description of the individuals and organizations to whom that information has been disclosed.

BCPC will make the information available within 30 days or provide written notice where additional time is required to fulfill the request.

In some situations, BCPC may not be able to provide access to certain personal information. This may be the case where, for example, disclosure would reveal personal information about another individual, the personal information is protected by solicitor/client privilege, the information was collected for the purposes of an investigation or BCPC is prevented by law from providing access to the personal information.

Where an access request is refused, BCPC will notify you in writing, document the reasons for refusal and outline further steps which are available to you.

10. Compliance

Any inquiries, complaints or questions regarding this Privacy Policy should be directed in writing to the Privacy Officer.

BCPC will give appropriate notice of any amendments to this Policy.