

**Whistler Community Services Society**

# **PRIVACY POLICY**

***Protecting Your Information***

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**WHISTLER COMMUNITY  
SERVICES SOCIETY**

*"A Helping Hand Toward A Healthy Community"*

**2018**



## **WHISTLER COMMUNITY SERVICES SOCIETY: PRIVACY POLICY**

The following document outlines Whistler Community Services Society (WCSS) policy in regards to protection of your personal information. This policy follows all the laws and regulations set out by the Provincial Government and Federal Government.

### **Personal Information Collection:**

WCSS will only ever collect individual's information in regards to any application made. Information may include personal financial records in cases where the program requires proof of financial status. By signing up to volunteer, become a member or apply for a program you are providing WCSS with permission to collect your information and use only under the parameters of this policy. Reasons we might collect information include, but are not limited to:

- ✓ Processing a membership, donation, registration, subscription or order form
- ✓ Verifying eligibility for membership
- ✓ Providing benefits to employees
- ✓ Sending out information on membership, programs etc
- ✓ Establishing eligibility for programs
- ✓ Identifying member, donor, volunteer or non-member preferences
- ✓ Providing proof of participation in, or eligibility for, a survey or research initiative

### **Using Personal Information:**

This personal information is used to assess the overall needs of clients in regards to WCSS programs and services. E-mails are only used to provide information regarding WCSS programs and services, or may be used to provide information on other non-profit events WCSS deems of benefit to individuals in the community. In all cases WCSS is in control of this communication flow. We will tell you why we need the information and how we use your information before you give it to us and will not use it for any other reason without your approval.

E-Mail communications are covered under this policy and there is a privacy disclaimer on the bottom of all e-mails, and an opt-out to refuse communications from WCSS.

## **Information Sharing Agreements:**

At no time will your personal information be provided, without your consent, to any party outside of WCSS. We do not share information with any other agency unless you have agreed to this, unless you are a harm to yourself, others or it involves the safety of a minor (17 and under).

Access to your information reflects the “Need-to-Know” principle. This states that access is restricted to authorized individuals in WCSS whose duties require such access. Individuals are not entitled access merely because of status, rank or office. This also means that information is physically segregated in a locked file drawer, that information is never left out on desktop, and there is a list of individuals who may access records. We also use “Role-Based Control” which relies on professional credentials and job titles to restrict users to just those access privileges that are required to fulfill one or more well-defined roles in WCSS.

## **Securing Your Data and Access to Your Personal Information:**

WCSS requires all staff members have a signed confidentiality waiver on file. As well any information collected for individuals is secured in locked and alarmed premises, and in computers that are firewall and pass-word protected. If you have further questions we are happy to share our further policies and will show you what information we have collected on you at any time. We will retain your information on file for the space of one year so it can be accessed by you, after that your information will be destroyed unless it is still in use. If you wish to access your information you will be asked to submit an Access Request Form to the WCSS Privacy Officer, and make an appointment to view materials.

In the case of the TAX ASSIST program your information is not retained and is destroyed within 24 hours of the tax return filing as per CRA requirements.

There is no access for staff to information once they have left the employ of WCSS. Contractors and third parties have no access to any information at any time. This includes the disabling of e-mail addresses, and access codes. And if for any reason we believe your information has been compromised we will contact you in writing to advise you of how this may have occurred and what risk it might present for you.

## **Cross Border Data Transfers:**

All information collected is only used in Canada and stays in Canada.

## **Other Web sites:**

We can only guarantee your privacy on our web site; and on that site we will never refer to any of your information including your name unless you have consented to this. We include on some waivers permission for WCSS to use your image in advertising or on the web site.

## **Contact Information:**

Access Request Forms are available on the WCSS website under the WCSS Policies page. Any client wishing to view their personal information on file may do so by contacting the WCSS Privacy Officer, Jackie Dickinson at 8000 Nesters Road, or PO Box 900, Whistler, BC V0N 1B0. Contact e-mail is [jackie@mywcss.org](mailto:jackie@mywcss.org)

## **Ongoing monitoring, Assessment & Adaptation:**

WCSS has in place controls to protect written and computer-based information. Any change in control procedures and policy must be approved by management and Board of Directors. WCSS monitors, assesses and adapts policies on an ongoing basis.

To report a breach in your privacy or misuse of your personal information contact WCSS in writing with details of the breach. Particulars of a complaint could include the following information: location, date, time, a description of the misuse of your information and your expectations.

WCSS has 30 days to respond to your complaint in writing and will make every effort to correct the issue. A privacy breach occurs when there is unauthorized access to, or collection, use, disclosure or disposal of, personal information.

If a complaint is found to be justified, WCSS will take appropriate measure, including amending policies and practices to prevent such a breach from occurring again.

If you are not satisfied with the actions based on your complaint, a complaint may be submitted in writing to OIPC, the *Office of the Information and Privacy Commissioner* respecting any matter under their jurisdiction under PIPA, the *Personal Information Protection Act*. <http://www.oipc.bc.ca>