



**Policy:** Protection of Personal Information  
**Type:** Operational  
**Approval:** Board  
**Date of Approval:** May 29, 2006

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***Rationale:***

In October 2003, the Provincial government passed a law to protect the privacy of personal information – the *Personal Information Protection Act (hereafter referred to as PIPA)*. This law applies to all registered non-profit organizations as of January 1, 2004. The Whistler Adaptive Sports Program requires a Personal Information & Privacy Policy that will reflect the changes made to the Provincial Act.

***Intent of the Policy:***

To protect the dignity of members, employees, directors, and volunteers, and the security of personal information that the Whistler Adaptive Sports Program may gather on individuals, in compliance with the Personal Information Protection Act (PIPA) and its principles.

***Purpose and Scope:***

The Whistler Adaptive Sports Program respects and upholds an individual's right to privacy and to the protection of his or her personal information. The Whistler Adaptive Sports Program is committed to ensuring compliance with applicable privacy legislation. This policy applies to individuals who are employed to work at any location of the Whistler Adaptive Sports Program as well as to Directors, members, program participants and volunteers of the Whistler Adaptive Sports Program.

***Definitions:***

“Personal Information” for the purposes of this policy means information about an individual. It does not include aggregate information which cannot be associated with a specific individual and it does not include the name, title business address, or business telephone number of an individual.

“Employee” for the purposes of the policy is an individual employed to work at any location of the Whistler Adaptive Sports Program, either on contract, full time, or part time, in either a volunteer or paid capacity.

“Director” for the purposes of this policy is a person elected or appointed as a Director of the Whistler Adaptive Sports Program.

“Member” for the purposes of this policy is any individual, organization, agency, association, business, or society who has registered and paid membership fees to the Whistler Adaptive Sports Program.

“Program Participant” for the purposes of this policy is an individual who participates in a program offered, delivered or contracted by the Whistler Adaptive Sports Program.

“Third party” for the purposes of this policy is an individual or an organization other than the Whistler Adaptive Sports Program and the member, volunteer, employee or Director.

### **Our Responsibilities:**

#### **Section 1: Accountability**

The Whistler Adaptive Sports Program is accountable for the personal employee, member, program participant and Director Information under its control. The Privacy Officer is responsible for the organization’s compliance with this policy. Other individuals within the Whistler Adaptive Sports Program may be delegated to act on behalf of the Privacy Officer, or to take responsibility for the day-to-day collection and processing of personal information.

#### **Section 2: Purposes for Collection, Use, and Disclosure**

The Whistler Adaptive Sports Program collects and uses personal information about **employees** for the following purposes:

1. *To administer compensation, benefits, and pension programs*  
For example, we may collect and use personal information to administer automatic payroll deposits and to provide medical benefits. We may also collect medical and other information for the purposes of approving leaves of absences
2. *To comply with legal and regulatory requirements*  
For example, we may collect personal information in response to a court order or to satisfy government reporting requirements
3. *To otherwise establish and manage the employment relationship and to plan and manage the Whistler Adaptive Sports Program’s workload and activities*  
For example, we collect and use personal information to check references, make staffing and employee development decisions, to measure and reward performance, and to assess our ability to meet the organization’s objectives.

The Whistler Adaptive Sports Program collects and uses personal information about **Directors** for the following purposes:

1. *To communicate with Directors*  
For example, we collect Director’s phone numbers and e-mail addresses so that we may contact them regarding Board meeting arrangements.
2. *To comply with legal and regulatory requirements*  
For example, we collect personal information to satisfy reporting requirements for government agencies such as the Registrar of Companies and the Canada Revenue Agency – Charities Division
3. *To provide insurance coverage for Directors*  
For example, we collect personal information required to provide for a Director’s insurance through the DSABC, CADS and other liability policies.

The Whistler Adaptive Sports Program collects and uses personal information about **Members** for the following purposes:

1. *To communicate with them on membership matters*  
For example, providing information about programs and services available to them, inviting them to organization related events, invoicing, and sharing news of interest to the sector.
2. *To enable better delivery of programs and services*  
For example, providing information about your medical and/or disability will allow for accurate matching of volunteers, programs and services for your needs. We may also collect financial information for determining eligibility for financial aid or bursaries

The Whistler Adaptive Sports Program collects and uses personal information about **Program Participants** for the following purposes:

1. *To communicate with them on program matters*  
For example, providing information about programs and services available to them, inviting them to organization related events, invoicing, and sharing news of interest to the sector.
2. *To enable better delivery of programs and services*  
For example, providing information about your medical and/or disability will allow for accurate matching of volunteers, programs and services for your needs. We may also collect financial information for determining eligibility for financial aid or bursaries

### **Section 3: Consent**

The acceptance of employment and benefits by an employee is viewed as consent for the Whistler Adaptive Sports Program to collect, use and disclose personal information about an employee for the purposes identified above. The Whistler Adaptive Sports Program views the purposes identified in this policy as reasonable and necessary to manage the organization and the employment relationship.

An employee may choose, however, to withhold or withdraw consent for the collection, use, and disclosure of personal information, subject to legal and contractual restrictions and reasonable notice, where the provision of this information is optional, such as in the consent for the use of a photograph for newsletters, other publications or the Whistler Adaptive Sports Program website.

The acceptance of an appointment as a Director is viewed as consent for the Whistler Adaptive Sports Program to collect, use, and disclose personal information for the purposes identified above.

A Director may choose, however, to withhold or withdraw consent for the collection, use, and disclosure of personal information, subject to legal and contractual restrictions and reasonable notice, where the provision of this information is optional, such as in the consent for the use of a photograph for newsletters, other publications or the Whistler Adaptive Sports Program website.

The application for membership with Whistler Adaptive Sports Program is viewed as consent for the Whistler Adaptive Sports Program to collect, use, and disclose personal information for the purposes identified above. A member may choose, however, to withhold or withdraw consent for the collection, use, and disclosure of personal information, subject to legal and contractual restrictions and reasonable notice, where the provision of this information is optional, such as in the consent for the use of a photograph for newsletters, other publications or the Whistler Adaptive Sports Program website.

#### **Section 4: Limiting Collection**

We collect personal information only for the purposes identified above.

#### **Section 5: Limiting Use, Disclosure, and Retention**

We do not use or disclose personal information for any purpose other than those for which it was collected, except as required by law, or with consent.

Personal information is retained only as long as is necessary for the fulfillment of the purposes for which it was collected, or as required by law.

#### **Section 6: Accuracy**

The Whistler Adaptive Sports Program will make all reasonable efforts to ensure that personal information is as accurate, complete, and current as required for the purposes for which it was collected. In some cases, the Whistler Adaptive Sports Program relies on employees, members, and Directors to ensure that certain information about them, such as their home address and phone number, or emergency contact number, is current, complete, and accurate.

#### **Section 7: Safeguards**

The Whistler Adaptive Sports Program will make all reasonable efforts to ensure that personal information is protected against such risks as loss, theft, unauthorized access, disclosure, copying, use, modification, or destruction. Safeguards include physical, administrative, and electronic security measures.

If personal information is disclosed to a third party, the Whistler Adaptive Sports Program will make all reasonable efforts to ensure that the third party has appropriate security procedures in place for the protection of the personal information transferred to it.

#### **Section 8: Openness Concerning Policies and Practices**

The Whistler Adaptive Sports Program will make available specific information about its policies and practices regarding the management of personal information. To contact us to obtain further information regarding our policies and practices, please refer to Section 11 below.

#### **Section 9: Access**

All employees, members and Directors have the right to access their personal information under the control of the Whistler Adaptive Sports Program. The Privacy Officer will assist employees, members, and Directors with their access requests. Access requests should be submitted in writing to Chelsey Walker, Executive Director. In certain exceptional situations, further to privacy legislation, the Whistler Adaptive Sports Program may not be able to provide access to certain personal information that it holds about an employee, member or Director. Examples of where the Whistler Adaptive Sports Program may not provide access include, but are not limited to, the following:

- Where provision may reveal personal information about another individual;
- Where the information is subject to solicitor-client privilege; or
- Where the information was collected in relation to the investigation of a breach of an agreement or a contravention of a federal or provincial law.

If access cannot be provided, the Whistler Adaptive Sports Program will notify the individual making the request, in writing, of the reasons for the refusal.

Where access has been provided and where the information is demonstrated to be inaccurate or incomplete, the Whistler Adaptive Sports Program will amend the information as required. Where appropriate, the Whistler Adaptive Sports Program will transmit the amended information to third parties having access to the information in question.

## **Section 10: Revisions to this Privacy Policy**

The development of the Whistler Adaptive Sports Program's policies and procedures for the protection of personal information is an ongoing process. Due to changes in technology and legal requirements we may revise this policy from time to time. Please ensure that you refer to the current version of the Whistler Adaptive Sports Program's Protection of Personal Information Policy. The current version will be found in the Whistler Adaptive Sports Program's Policy and Procedures manual.

## **Section 11: Concerns or Questions regarding the Whistler Adaptive Sports Program's Compliance**

Employees, members, and Directors may direct their general questions regarding privacy at the Whistler Adaptive Sports Program, as well as any questions or concerns regarding the Whistler Adaptive Sports Program's compliance with this policy to the interim Privacy Officer.

The Whistler Adaptive Sports Program will investigate all complaints received in writing. If a complaint is found to be justified, the Whistler Adaptive Sports Program will take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. An individual will be informed, in writing, of the outcomes of the investigation regarding his or her complaint.

For general questions regarding privacy regulations, or for a copy of the Personal Information Protection Act contact the Office of the Information and Privacy Commissioner of BC at:

David Loukidelis  
Office of the Information and Privacy Commissioner for BC  
PO Box 9038, Stn. Prov. Govt.  
Victoria, BC V8W 9A4

Telephone:  
250-387-5629 (in Victoria)  
For toll-free access, call Enquiry BC at one of the numbers listed below and request a transfer to 250-387-5629.

### Enquiry BC

Metro Vancouver: 604-660-2421

Elsewhere in BC: 1-800-663-7867

Website: [www.oipc.bc.ca](http://www.oipc.bc.ca)