

PRIVACY AND CONFIDENTIALITY POLICY

The Victoria Pride Society is committed to keeping personal and business information collected accurate, confidential, secure, and private. We acknowledge our responsibilities as required by Canadian privacy laws, including the Personal Information Protection and Electronic Documents Act (PIPEDA), and the Personal Information Protection Act (PIPA) of British Columbia.

This Policy contains the following sections:

- Responsibilities describes:
 - general responsibilities of all directors to safeguard the personal and business information gathered by the Victoria Pride Society
- Collecting personal and business information details how:
 - we identify the purpose for which we are collecting information
 - we obtain consent to collect, use, and disclose that information
 - individuals or businesses can refuse or withdraw consent for collection, retention, use, or disclosure of their information
- Providing Access to Information describes:
 - our procedure for providing individuals or businesses with access to their personal information, and ensuring that personal or business information is accurate
 - how the Board of Directors should respond to third party requests /demands for information on an individual or business (eg: court orders, subpoenas, search warrants, or other demands or requests that are believed to be valid, or to comply with the rules of production of a court)
- Safeguarding, Retention, and Destruction describes:
 - how we safeguard information provided to us
 - our policy regarding retaining information only as long as required and appropriately destroying information once it is no longer required
- Handling Questions and Complaints describes:
 - how individuals or businesses can contact us to ask questions about our privacy practices or complain about a privacy matter
- Managing Privacy Breaches describes:
 - how to deal with known or suspected breaches of privacy

RESPONSIBILITIES

- All directors have a responsibility to safeguard the personal and business information entrusted to us, as well as the confidentiality of Victoria Pride Society's own affairs.
- All directors are expected to be aware of, understand, acknowledge, and follow the policies and procedures that Victoria Pride Society has outlined

to protect confidential information, and to comply with applicable laws and regulations.

- All directors agree that business discussed at a meeting of directors is not to be discussed with anyone that is not a member in good standing of the Victoria Pride Society except that business which is necessary to the furtherance of the goals of the Victoria Pride Society.
- All directors agree to take all necessary steps to protect the information gathered on behalf of their duties for Victoria Pride Society including but not limited to encrypting digital data, using secure passwords to limit access to information, securely storing physical information, securely shredding / destroying physical information, securely erasing digital information.

COLLECTING PERSONAL & BUSINESS INFORMATION

The Victoria Pride Society collects personal / business information to assist us in the following:

- verifying the identity of an individual / business
- ensuring that registered participants of a Victoria Pride Society event have received their ticket, service, or product
- ensure that registered participants of a Victoria Pride Society event have registered under the correct category (if applicable)
- to fulfill our obligations as required by law (ie: the Societies Act of British Columbia)
- to respond to court orders, subpoenas, search warrants, or other demands or requests that are believed to be valid, or to comply with the rules of production of a court
- to assist in an insurance adjudication or investigation

The Victoria Pride Society must inform individuals / businesses why information is being collected, and how that information will be used or disclosed.

Individuals / businesses must provide permission for the Victoria Pride Society to collect, use, and disclose their information (except as required by law). If explicit permission has not been obtained for a specific use of the information collected, then the information cannot be used. The Victoria Pride Society may not rely upon a “negative option” or “assumed consent” model for collecting information.

Individuals / businesses may refuse to provide information to the Victoria Pride Society, however this may impact their ability to participate with the Victoria Pride Society. Individuals / businesses must provide a minimum of information to participate, and the information required may vary in each situation. If an individual / business refuses to provide the requested information, the refusal

must be presented at the next meeting of the Board of Directors for discussion and resolution. Resolution is to be reached by the processes outlined in the current version of the Victoria Pride Society by-laws. Refusals may be (but are not required) referred to a legal expert if deemed necessary, however no personal / business information may be provided in the referral.

Individuals / businesses may withdraw their consent for the use, retention, or disclosure of their information, however consent cannot be withdrawn if the use of that information is still in progress (ie: a vendor may not withdraw their consent the day before the Pride Festival for the use of their information on Festival day if they will still be attending). When an individual / business provides notification of their withdrawn consent, the Victoria Pride Society must respond within seven calendar days confirming the information has been destroyed.

PROVIDING ACCESS TO INFORMATION

Individuals / businesses may request a copy of the information that the Victoria Pride Society maintains on them by sending a mail request to the address of the Victoria Pride Society, or by emailing the secretary of the Victoria Pride Society. The Victoria Pride Society must respond within seven calendar days of receipt of the request.

Individuals / businesses may request to update their information held by the Victoria Pride Society, and they may send their request by mail to the address of the Victoria Pride Society, or by emailing the secretary of the Victoria Pride Society. The Victoria Pride Society must update and respond within seven calendar days of the receipt of the request.

The Victoria Pride Society may not provide information on individuals / businesses to anyone other than the rightful owner of that information except as required by law. The Victoria Pride Society may not enter into any agreement that would provide information to third parties except as required by law. If the Victoria Pride Society receives a lawful third-party request / demand for information (eg: court orders, subpoenas, search warrants, or other demands or requests that are believed to be valid, or to comply with the rules of production of a court), the Victoria Pride Society is required to refer the request to a legal expert to determine the minimum amount of information required to satisfy the request / demand for information. All such requests / demands must first be brought to the attention of the full Board of Directors before being referred to a legal expert. The Victoria Pride Society is to inform the individual / business of the information provided to fulfill the request / demand within 30 calendar days of fulfillment unless unable to do so by law.

Under no circumstance is the Victoria Pride Society to release information to an

unauthorized individual, and such breaches are to be reported in accordance with the Managing Privacy Breaches section of this policy.

SAFEGUARDING, RETENTION, AND DESTRUCTION

The Victoria Pride Society agrees to take all necessary steps to protect the information gathered including but not limited to encrypting digital data, using secure passwords to limit access to information, and securely storing physical information. Directors agree to safeguard information contained within emails by not automatically forwarding their emails to, or responding to emails from an email address not contained within the @victoriapridesociety.org domain. Directors agree to safeguard “cloud” documents by only initiating or sharing such documents within the @victoriapridesociety.org domain and approved cloud storage application(s).

Information gathered by the Victoria Pride Society shall have a retention period of seven years after the last date of collection, modification, or confirmation.

When destroying information, the Victoria Pride Society must ensure that physical information is securely shredded and digital information is securely erased.

HANDLING QUESTIONS AND COMPLAINTS

Individuals / businesses may direct their privacy questions to the Victoria Pride Society by post mail sent to the address of the Victoria Pride Society, or by emailing the secretary. The Victoria Pride Society must acknowledge receipt of the question within seven calendar days, and must provide a response or update within 30 calendar days.

Individuals / businesses may direct their privacy complaints to the Victoria Pride Society by post mail sent to the address of the Victoria Pride Society, or by emailing the secretary. The Victoria Pride Society must acknowledge receipt of the complaint within seven calendar days, and must provide a response or update within 30 calendar days.

MANAGING PRIVACY BREACHES

If a breach of privacy is suspected or confirmed, it must be brought immediately to the attention of the full Board of Directors. The Board of Directors shall determine what steps are appropriate to resolve the breach, and may enlist the assistance of a legal expert to advise in a proper course of action.

Any individual / business affected by a privacy breach is to be contacted and informed of the nature of the breach within 30 calendar days of the discovery of the breach.

Last updated June 2016