

S.A.L.T.S. Personal Information Privacy Policy

S.A.L.T.S. Sail and Life Training Society is committed to protecting personal information about our members, donors, employees, volunteers, customers, clients, suppliers and contractors. Our goal is to maintain the highest quality of service and integrity in all our dealings.

Scope of this Policy

This policy applies to our employees, volunteers, Board members, committee members, and any service providers collecting, using or disclosing personal information on behalf of S.A.L.T.S. Sail and Life Training Society. This policy was created to comply with British Columbia's *Personal Information Protection Act (PIPA)*.

Definitions

"Personal information" is any information about an identifiable individual including name, age, home address and phone number, social insurance number, marital status, religion, income, credit history, medical information, education, employment information. Personal information does not include work product information or contact information (described next).

"Contact information" means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.

Collecting Personal Information

We only collect, store, use, and disclose personal information as needed to:

- Provide services required including the establishment and maintenance of our relationships with buyers and sellers;
- Establish, maintain or terminate relationships with our employees and volunteers;
- Administer our business including fundraising and our charitable programs and activities or;
- Meet legal, regulatory or statutory requirements.

Consent

We will inform the individual from whom personal information is being collected of our purposes and will ensure such individuals have consented to our collection, use, storage or disclosure of the personal information for the purposes we have indicated (except where, as noted below, we are authorized to do so without consent). Consent can be provided orally, in writing, electronically, or through an authorized representative. Consent can be implied where the purpose for collecting, using, or disclosing the personal information would be considered obvious and the individual provides personal information for that purpose. Consent may also be implied when an individual is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products, or fundraising and the individual does not opt-out. Individuals who have given consent for us to collect, use, store or disclose personal information have the right to withdraw that consent at any time by giving us written or oral notice. We will honour opt-out requests unless this would frustrate the performance of a legal obligation or cause us to be unable to provide the service or product the individual has requested, in which case we will explain the situation to the individual. We will not collect, use, store or disclose an individual's personal information except in accordance with the law. When possible, we will collect any required personal information directly from the individual to whom it pertains.

We may collect, use, or disclose personal information without the individual's knowledge or consent in the following limited circumstances:

- When the collection, use, or disclosure of personal information is permitted or required by law
- In an emergency that threatens an individual's life, health, or personal security
- When the personal information is available from a public source (e.g. a telephone directory or website)
- When we require legal advice from a lawyer
- For the purposes of collecting a debt
- To protect ourselves from fraud
- To investigate an anticipated breach of an agreement or a contravention of law

Use and Disclosure of Personal Information

Personal information collected from members, donors, employees, volunteers, customers, clients, suppliers and contractors will only be used or disclosed in ways necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes, or as noted above in the "Consent" section. We will not use or disclose personal information for any additional purpose unless we obtain consent to do so. We will not sell client, customer, donor, or member lists or personal information to other parties.

Retaining Personal Information

If we use personal information to make a decision that directly affects a member, donor, employee, volunteer, customer, client, supplier or contractor, we will retain that personal information for at least one year so that the individual has a reasonable opportunity to request access to it. We will retain personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

Ensuring Accuracy of Personal Information

We make every reasonable effort to ensure the accuracy and completeness of the personal information we collect, store, use, and disclose. Individuals wishing to access or correct the personal information we have about them should contact us at the telephone number or mailing address referenced below. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.

Safeguarding Personal Information

We are committed to ensuring the security of personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks. Security measures will be followed to ensure that personal information is appropriately protected. *Examples may include: the use of locked filing cabinets; physically securing offices where personal information is held; the use of user IDs, passwords, encryption, firewalls; restricting employee access to personal information as appropriate.* We will use appropriate security measures when destroying personal information such as shredding documents and deleting electronically stored information. We will review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Inquiries or Complaints / Access to Personal Information

Individuals have the right to access personal information we have collected about them, subject to limited exceptions. A written request to access personal information must be made to the Privacy Officer and provide sufficient detail to identify the personal information being sought. Upon request, we

will also explain how we use an individual's personal information and to whom it has been disclosed if applicable. We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request. A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the individual of the cost and request further direction on whether we should proceed with the request. If a request is refused in full or in part, we will notify the individual in writing, providing the reasons for refusal and the recourse available.

Privacy Officer

Any inquiries or concerns about the personal information we have about individuals or about the application of this policy should be directed to our Privacy Officer:

Loren Hagerty, Executive Director

Phone: 250.383.6811

Email: director@salts.ca

S.A.L.T.S. Sail and Life Training Society, 451 Herald Street, Victoria, BC, V8W 3N8

If the Privacy Officer is unable to resolve the concern, the individual may also write to the Information and Privacy Commissioner of British Columbia.