

**Mavis McMullen Housing Society**  
**PERSONAL INFORMATION PROTECTION POLICY**

**Introduction**

Effective January 1, 2004, the provincial *Personal Information Protection Act (PIPA)* regulates the collection, storage, use and disclosure of personal information by any organization in British Columbia not subject to other privacy legislation. Personal information is defined by the Act as "information about an identifiable individual". It includes employee personal information but excludes contact information and work product information.

**1. Accountability**

The board will appoint a Personal Information Protection Officer (PIP Officer) and provide the PIP Officer with a job description outlining duties as per PIPA, and appropriate training.

The board will co-operate fully with the PIP Officer in the performance of the Officer's duties and in implementation of the policy.

Mavis McMullen Housing Society will ensure that once a year the Board of Directors are reminded of this policy, the underlying principles and aims, and the procedures that accompany it.

**2. Identifying purposes**

Mavis McMullen Housing Society only collects the personal information it requires to ensure sound management of the organization and to fulfill its obligations to its members, applicants, tenants and the government.

When personal information that has been collected is to be used for a purpose not previously identified, the new purpose will be identified before using it.

**3. Consent**

Subject to Article 8 (Exemptions), Mavis McMullen Housing Society will collect, use and share personal information only when three conditions have been met:

- The information is needed for an identified purpose;
- That purpose has been explained to the person we are seeking information from, or the purpose would be considered obvious to a reasonable person;
- The person has consented to the collection of information for that purpose and understands that he or she may withdraw his or her consent at any time in writing.

**4. Storage of Information**

Mavis McMullen Housing Society will store personal information securely so as to prevent its unauthorized use. Access will be restricted to the individual who provided the information, the Personal Information Protection (PIP) Officer, if necessary, and the persons who need the information for the purpose for which it was gathered.

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**5. Access to Information**

Individuals will, on written request, have access to any personal information about themselves that the Mavis McMullen Housing Society has. We will provide the information within 30 days, except where to do so would be in violation of *PIPA*. If access cannot be provided, Mavis McMullen Housing Society will notify the individual making the request, in writing, of the reasons for the refusal.

Should an individual point out any errors in the personal information we have about him or her, Mavis McMullen Housing Society will correct the information, if possible. If the incorrect information was shared with any third parties during the year before the date the correction was made, Mavis McMullen Housing Society will send them, where appropriate, the corrected personal information.

**6. Retention of Information**

Mavis McMullen Housing Society will keep personal information only for as long as we need it to achieve the purpose for which it was collected. Our operational procedures will identify the general classes of personal information we gather and will set out standard retention periods for each one. Where personal information contributes to the making of a decision that directly affects an individual, we will keep the information for at least one year after the decision was made to provide the individual with a reasonable opportunity to obtain access to it.

Once every two years, Mavis McMullen Housing Society will review the purposes for which it collects personal information, the general classes of information collected, and the retention period for each class, and will modify operational procedures, as required.

**7. Destruction of Information**

Mavis McMullen Housing Society will review its files according the retention schedule and will destroy or erase any personal information no longer needed for the purpose it was collected. While the absolute destruction of electronic data is difficult to achieve, Mavis McMullen Housing Society will make every reasonable effort to eliminate all redundant personal information from our files.

**8. Exemptions**

Mavis McMullen Housing Society may make personal information available without permission if the information is used to take action during an emergency that threatens the life, health or security of an individual.

Mavis McMullen Housing Society may make personal information available to the appropriate authorities if it has reasonable grounds for believing that, by doing so, it is helping in the investigation or prevention of a breach of the laws or security of Canada or a province.

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Mavis McMullen Housing Society may also make personal information available without consent in other circumstances permitted by *PIPA*.

The PIP Officer will not report any collection, use or disclosure of personal information without consent to the Mavis McMullen Housing Society Board of Directors.

**9. Complaints Process**

Mavis McMullen Housing Society's will develop a complaints procedure, so that if an individual is dissatisfied with Mavis McMullen Housing Society's handling of his or her personal information, he or she may make a formal complaint. The complaints procedure will be available from the PIP Officer on request

**10. Personal Information Protection Officer**

The PIP Officer will be responsible for Mavis McMullen Housing Society's compliance with the *Personal Information Protection Act*, or any legislation that takes its place, and this policy.

The PIP Officer will respond to and investigate any inquiries or complaints about the way the Mavis McMullen Housing Society collects, uses or discloses personal information. Where appropriate, the PIP officer can direct appropriate questions to the Society's Property Manager.

The PIP Officer will document any misuse of personal information and will report it to the Board of Directors at the next regular meeting. The PIP Officer will recommend changes in the system of managing personal information, as appropriate.

The PIP officer will provide a copy of the complaints procedure on request.

**11. Application of this Policy**

This policy must be followed by individual directors, employees, independent contractors acting in Mavis McMullen Housing Society's name, committee members and any other volunteers acting on Mavis McMullen Housing Society's behalf. If any of these individuals is unsure about the requirements of Mavis McMullen Housing Society's system for managing personal information, he or she may consult the PIP Officer.

**12. Conflict Between This Policy and Applicable Privacy Legislation**

If a legal expert or competent authority advises the Mavis McMullen Housing Society that this policy conflicts with the *Personal Information Protection Act* or any successor legislation, Mavis McMullen Housing Society will amend the policy, while retaining all the acceptable provisions.

**13. Definitions**

Where a word or phrase used in this policy is defined in *PIPA*, the definition given in the *Act* will apply to this policy.

## Mavis McMullen Housing Society Complaints Procedure

If you have a complaint about how the Landlord deals with personal information

1. Talk to the Landlord's Personal Information Protection Officer (PIP Officer) to find out if the *Personal Information Protection Act* (PIPA) covers the subject of your complaint.
2. If it appears that the Mavis McMullen Housing Society has not followed PIPA, put your complaint in writing, sign it, and give it to the Landlord's PIP Officer. You can ask the PIP Officer to help you write the letter.
3. Wait a reasonable time for a response (30 days in most cases).
4. If you are not satisfied with the response, you can take your complaint to the provincial Information and Privacy Commissioner:

David Loukidelis

Office of the Information and Privacy Commissioner for British Columbia  
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

Metro Vancouver: 604.660.2421

Elsewhere in BC: 1.800.663.7867

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

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