One Girl Can Society Privacy Policy

Introduction

One Girl Can Society ("OGC") recognizes the importance of and is committed to protecting the personal information of its constituents (OGC members, employees, donors, volunteers, directors, students and applicants).

OGC is governed by the requirements of the BC *Personal Information Protection Act* (PIPA) and collects, uses or discloses personal information in accordance with its provisions.

Definitions

"Personal Information" means information about an identifiable individual and includes employee personal information but does not include

- (a) contact information, or
- (b) work product information

"Collection" – the act of gathering, acquiring, or obtaining personal information from any source, by any means.

"Consent" – involves voluntary agreement with what is being done or proposed. Consent may be express or implied.

"Express consent" signifies than an individual, knowing what personal information is being collected and for what purposes, willingly agrees to the information being collected, used and disclosed as notified. It may be given in writing or verbally.

"Implied consent" exists when an individual is "deemed" to consent to collection, use or disclosure of personal information if the individual voluntarily provides it for a purpose that would, at the time, be considered obvious to a reasonable person.

1. Accountability

OGC is responsible for the confidentiality of personal information in its custody or under its control in compliance with the applicable provincial legislation.

OGC has appointed a Privacy Officer to be responsible for implementing the privacy program and ensuring compliance with legislation.

Members of the OGC community (employees, volunteers, donors and directors) are responsible for day-to-day compliance with this Privacy Policy.

2. Identifying Purposes

OGC will always endeavor to communicate the purposes for which personal information is collected at or before the time the information is collected.

OGC collects personal information for the following reasons:

- To employ, manage and compensate staff or volunteers
- To develop and manage services to meet the needs of our members, employees, suppliers, volunteers, donors, directors, students and applicants
- To meet regulatory requirements

3. Consent

OGC will collect, use or disclose personal information only with knowledge and consent, except where required or permitted by law.

Consent may be implied in some situations while express consent is required for the collection, use and sharing of confidential and sensitive information. OGC reserves the right to disclose information where required or allowed by law.

Consent may be withdrawn at any time, on reasonable notice, subject to legal or contractual restrictions.

4. Limiting Collection

OGC will limit collection of personal information to what is necessary for the purposes for which it is collected.

OGC will always collect personal information by fair and lawful methods.

5. Limiting Use, Disclosure and Retention

Personal information will only be used or disclosed for the purpose for which it was collected, except with the individual's consent or as required or permitted by law.

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

6. Accuracy

OGC will make 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, OGC relies on its constituents to ensure that certain information, such as the constituent's address or telephone number, is current, complete, and accurate.

From time to time OGC may contact the individual to ensure that the information collected is or remains accurate and up-to-date.

7. Safeguards

OGC protects personal information by ensuring security safeguards appropriate to the sensitivity of the information are in place, including through the use of the following measures:

- o Physical (i.e. locked filing cabinets, restricted access, appropriate security measures when disposing of personal information);
- o Organizational (i.e. security clearances, access only on a "need to know" basis);
- o Technological (i.e. passwords, firewalls, data disconnection from the internet, and regular backups) and training of employees.

8. Right of Access

OGC is open about the policies and procedures it uses to protect personal information. Any inquiries may be made to our Privacy Officer.

Upon written request, OGC will within a reasonable time period, tell the individual what personal information it has, for what purposes it is being used, and to whom it has been disclosed if applicable and within the time period for which records are available.

Individuals have the right to challenge the accuracy and completeness of their information and have it amended if it is inaccurate, incomplete or out-of-date.

In certain circumstances, OGC may refuse to disclose personal information:

- where required by law, certain personal information may not be disclosed;
- where the information contains personal information about another individual;
- where the information is of such a nature that its disclosure could reasonably be expected to prejudice the mental or physical health of the individual;

- where the information was gathered in the course of a formal dispute resolution process;
- where the information is subject to solicitor-client or litigation privilege.

9. Compliance and/or Contact

Requests for access to information, issues or complaints about OGC's compliance with this Policy regarding the handling of personal information, and questions or comments about this Policy may be addressed to OGC's Privacy Officer.

One Girl Can Society 3765 William Street Vancouver, BC V5C 3H8

Attention: Privacy Officer

If the Privacy Officer is unable to address the concerns, the issue can be referred to Administration.

At any point the individual may also write to the Information and Privacy Commissioner of British Columbia.

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

Phone: (250) 387-5629 Fax: (250) 387-1696 Email: info@oipc.bc.ca