

Protection of Personal Information

Impact North Shore respects your privacy and is committed to protecting your personal information. This document outlines how we handle the collection, use, disclosure, and protection of your personal information in compliance with federal and BC privacy laws, our funder requirements, and best practices in privacy and security, as stipulated in our Privacy Policy.

If you have questions or would like to view our Privacy Policy, please contact the Privacy Officer:

Attention: Privacy Officer
Impact North Shore
207 – 123 East 15th Street
North Vancouver, BC V7L 2P7

604-988-2931

Privacy@ImpactNorthShore.ca

Personal Information

Personal information means information about an identifiable individual, including employee personal information, but it does not include business contact information. Examples of personal information collected by Impact North Shore include but are not limited to:

- Identifying Information (e.g., name, address, birth date, Permanent Resident Number, Unique Client Identifier - UCI Number, Social Insurance Number, country of birth)
- Intake Information (e.g., languages spoken, immigration status)
- Education & Work History
- Licensures and Certificates
- Emergency Contacts
- Tax & Payroll Related Information (for employees)
- Criminal Record Check Results (employees and volunteers)
- Other information required or permitted by law

Accountability

Personal information that is collected, used, and disclosed by Impact North Shore is done so in accordance with the Personal Information & Protection Act (PIPA), the Freedom of Information & Protection of Privacy Act (FIPPA) when required by funders, the Personal Information Protection & Electronic Documents Act (PIPEDA), Canada's Anti-Spam Legislation (CASL), and/or any other applicable legislation as well as any funder requirements pertaining to privacy and security. It is recognized that our funders are also bound by specific legislation, including FIPPA and Canada's Privacy Act, that protect personal information that is in their control and custody.

Our Privacy Officer ensures organizational compliance with the Privacy Policy. Privacy-related concerns, inquiries, or requests are directed to the Privacy Officer, who can be contacted at:

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Purpose

We collect, use, and disclose personal information to conduct our operations as well as to deliver programs and services. It is only for purposes that a reasonable person would consider appropriate considering the circumstances. The purposes for collecting personal information include:

- Meeting legal, regulatory, and contractual requirements.
- Establishing, maintaining, and/or terminating relationships with staff, volunteers, clients, and donors.
- Developing, managing, evaluating, and improving operations, programs, and services.
- Advancing equity across our operations, programs, services, policies, and practices.
- Verifying identity of individuals.
- Determining program/service, employment, or volunteer eligibility.
- Assessing and understanding client needs.
- Making appropriate referrals to internal and external programs and service interventions.
- Providing programming and services that meet the needs of clients.
- Monitoring client progress and outcomes.
- Understanding the changing needs of communities.
- Communicating with staff, volunteers, clients, donors, and general public.
- Collecting data for statistical purposes.
- Preparing reports to funders and the public about programs and services.
- Issuing tax receipts and other administrative requirements including information requests.
- Processing and collecting fees for programs/services.
- Providing safe and secure work and service environments.

Unless authorized by law, we do not use nor disclose personal information for any new purpose without the consent of the individual.

Consent

We collect, use, and disclose personal information with the consent of the individual except in limited circumstances as authorized by law. In determining the appropriate form of consent, we consider both the sensitivity of the personal information and the reasonable expectations of the individual in terms of the consent required.

We may collect, use, or disclose personal information without the individual's consent in limited circumstances outlined in PIPA. These circumstances include, but are not limited to, when:

- Use is necessary to respond to an emergency that threatens the life, health, or security of an individual.

- Collection/use/disclosure is necessary for the medical treatment of the individual and the individual does not have the legal capacity to give consent.
- Collection/use/disclosure is required or authorized by law.
- Disclosure is for the purpose of complying with a subpoena, warrant or order issued or made by a court, person, or body with jurisdiction to compel the production of personal information.
- Other circumstances as permitted by law.

An individual may withdraw their consent at any time, subject to certain service, legal, or contractual restrictions and reasonable notice.

Limited Collection

We limit the collection of personal information to the minimum necessary for the purposes identified. We collect information through fair and lawful means and avoid collecting information indiscriminately.

Limited Use & Disclosure

We use and disclose personal information for the purposes for which it was collected. We do not use nor disclose personal information for any other purpose unless we have obtained an individual's consent to do so, or it is required or permitted by law.

Retention & Disposal

We retain personal information for as long as it remains necessary for the identified purposes, including for the purpose of meeting any legal, accounting, or other funding contractual and reporting requirements or obligations, and is permitted by law.

When personal information is no longer required or relevant for the identified purposes or required to be retained by law or under contract, we dispose of it in accordance with privacy law, funder requirements, security best practices, and organizational policies and security standards.

Accuracy & Correction

We make reasonable efforts to ensure personal information is accurate, complete, current, and relevant for the purposes for which it is used, based on information provided by individuals or third parties authorized by them.

Individuals may submit a written request to correct any error or omission to their personal information. If a correction is reasonable, we amend the information as soon as reasonably possible and maintain the original record. If we do not agree with the request, we advise the individual accordingly.

Security of Personal Information

We protect personal information in our control in accordance with applicable laws, funder and insurance requirements, as well as privacy and security best practices as appropriate for the sensitivity of the information. Personal information is restricted to authorized staff, volunteers, or other individuals or organizations acting for or on behalf of Impact North Shore, and who require the information to carry out their roles and responsibilities on a need-to-know basis.

We implement reasonable physical, technical, and administrative measures to protect personal information. We continually review and update our policies, procedures, and controls as best practices evolve. Questions about how we protect personal information can be directed to our Privacy Officer at Privacy@ImpactNorthShore.ca.

Privacy Breaches & Violations

We respond to suspected or actual privacy breaches, violations, or any events that threaten the security of personal information in accordance with the requirements set out in PIPA, PIPEDA, or FIPPA, as well as any funder and insurance requirements.

Right to Access Personal Information

An individual can formally request access to their personal information by submitting a written request to our Privacy Officer. The individual (i.e., the requestor) must submit a signed request form (available by request) to the Privacy Officer and we will respond in accordance with our Privacy Policy. We may limit access to personal information as required or permitted by law.

Challenging Compliance

If an individual is dissatisfied with the collection and management of their personal information, or they believe that we have not complied with the Privacy Policy, PIPA, PIPEDA, and/or FIPPA, they have the right to submit a complaint to our Privacy Officer.

The individual (i.e., the complainant) must submit a signed letter or a completed "Complaint Form" (provided by Impact North Shore) detailing their concerns. The Privacy Officer can assist the individual in preparing their complaint if required. The Privacy Officer makes reasonable efforts to resolve complaints, and complainants are informed of outcomes.

While we encourage the use of our organizational complaints resolution process first, any individual may choose to seek advice from or file a written complaint with the Office of the Information & Privacy Commissioner for BC (OIPC) at 250-387-5629 or info@oipc.bc.ca.