

411 Seniors Centre Society

Privacy Policy

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1. Introduction

The 411 Seniors Center Society (411) is committed to protecting the confidentiality and privacy of all individuals (often referred to as participants throughout this policy) accessing our services, programs, and resources. The 411 is specifically accountable for compliance with BC's *Personal Information Protection Act* ["PIPA"]. PIPA sets out rules for how organizations collect, use and disclose personal information. 411 is committed to being accountable for how we handle personal information, as well as how we follow the rules and procedures outlined in this policy.

This policy governs all staff, volunteers, and affiliates associated with 411 Seniors Center.

Please note that individuals must opt in for all communication, including but not limited to: digital, community programs, senior's services communication. This means we will only contact individuals who have expressly agreed to receive communication from us.

Personal information - is a broadly defined term that includes information that is reasonably capable of identifying a particular individual either alone or when combined with information from other available sources. Personal information includes employee personal information. It does not include 411's contact information or work product information.

Some examples of personal information are: name, address, gender, education, income, financial information, medical and genetic information, date of birth, drivers' license number, photographs or images of an individual, employment history, and product preferences.

This Privacy Policy outlines how we collect, use, share, and protect your personal information when you interact with us.

2. Information We Collect and Don't Collect

We collect various types of information, including personal information, when you engage with our community programs and services.

Confidential information includes, but is not limited to:

- Personal identification details (names, addresses, phone numbers, email addresses)
- Health information
- Financial information
- Personal circumstances
- Any information disclosed during appointments or other interactions.

Memberships Volunteer Applications require name, address, phone and email.

Included in the membership application is a photo release as we will take and collect photos from our events (see below):

Photo release I agree

By submitting this membership application, you irrevocably grant to the 411 Seniors Centre Society the perpetual and exclusive use of photographs and videos taken of you during the Centre's activities, programs, and use of services in any of its official publications. This includes, but is not limited to, the 411 newsletters, brochures, slide shows, videos, and website. I waive any right to royalties or other compensation arising from or related to the use of photographs, videotapes, or film.

We don't collect information on family members that have not opted in, we don't collect or store financial information such as credit card numbers and bank account numbers.

We will retain bank account numbers and information upon approval and only for remitting payments.

We may ask for extra information including emergency contact for field trips. This information is collected on an as needed basis and will not be kept on file.

Accuracy of information 411 makes every effort to ensure that personal information collected is accurate and complete, if the information is likely to be used in decisions that affect individuals or to be disclosed to another organization:

- We will make reasonable arrangements to ensure that the personal information we collect, use, or disclose is accurate and complete
- individuals may request that 411 correct any errors or omissions in their personal information that is under our control

- if we are satisfied that an individual's request for correction is reasonable, we will correct the information and send the corrected information to organizations we disclosed that information to during the year before the date the correction was made; and
- if we are not satisfied that the request for correction is reasonable, we will annotate the information, noting that the correction was requested but not made

3. How We Use Your Information

We use the information we collect to provide and improve our services, communicate with you, and fulfill our organizational mandates.

Many of our funders ask for details about our program participants this information is almost universally anonymous. No private or confidential or identifying information will be provided to funders without the expressed written consent of the participant.

Anonymized information (we omit names and identifiers) will be used for:

- Statistical purposes
- Making improvements to our services and programs
- Reporting to our funders

3rd Party usage is not permitted and against our Privacy Policy. No private or confidential or identifying information will be provided to 3rd parties. We do not share our private or confidential or identifying information with anyone outside the organization.

For services and programs that do not require membership such as drop-in and information and referral services. 411 requires written consent by the participant in order for us to contact participants directly. Furthermore, we will only contact participants directly to ask for feedback to improve service delivery and analyze trends. This information will not be used to solicit donations or request further involvement.

We do not share your personal information with others for any reason unless for specific purposes outlined in this policy.

Exceptions: Confidential information may be disclosed without consent in situations where:

- Required by law or court order.
- Necessary to prevent harm to an individual or others.

Required for the coordination of services with other agencies or organizations, with the explicit consent of the individual concerned

411's Privacy Officer

A privacy officer is the first point of contact in 411 when privacy issues arise. He or she has the authority to intervene on privacy issues relating to any of 411's operations. Our privacy officer is responsible for:

- Conducting a privacy audit and self-assessment
- Developing a privacy policy
- Implementing and maintaining a privacy policy
- Managing privacy training
- Responding to requests for access to and correction of personal information
- Working with the [Information and Privacy Commissioner](#) in the event of an investigation

A privacy officer must also be familiar with the [Personal Information Protection Act](#) and the [ten principles of privacy protection](#)

By law, all organizations must assign at least one privacy officer. 411 staff are encouraged to discuss privacy issues with the officer. The title and contact information of our privacy officer is made available to the public in our reception and on our website. A privacy officer can delegate his or her duties to another individual if the transfer of responsibility is formally documented.

What is the Privacy Officer's Role if a Complaint is Made to the Information and Privacy Commissioner?

If the [Information and Privacy Commissioner](#) receives a complaint regarding 411's personal information practices, our privacy officer may be contacted to provide information and assistance.

We retain your information only for as long as necessary to fulfill the purposes outlined in this policy.**4. Data Security**

- I. Confidential information will be stored securely and accessed only by authorized personnel. 411 will make all reasonable efforts to store data in Canada
- II. All electronic records will be password protected and encrypted where applicable.
- III. Paper records will be kept in locked cabinets or rooms or secure areas when not in use.
- IV. Confidential information that identifies individuals will not be stored on personal devices or taken off-site without prior authorization from the Privacy Officer.
- V. Except for consent forms, identifying records from Information and Referral appointments and the Tax Clinic will be kept for a maximum of one year.
- VI. Call 411 Staff are required to sign a Confidentiality Agreement

5. Your Choices

You have choices about how we use and share your information, including opting in for digital communications related to community programs and 411 services.

Members have the choice on whether or not they would like to receive emails and newsletters and other digital correspondence (see below).

Email Notification Consent*	<input type="checkbox"/>	I agree	<input type="checkbox"/>	I disagree
Sign up to receive 411 Bulletins & E-Newsletter	<input type="checkbox"/>	Yes, keep me updated		

6. Implied Consent

By providing us with personal information, you consent to our collection, use, and disclosure of your information **only** in accordance with this Privacy Policy. You may withdraw your consent at any time, subject to legal or contractual restrictions, by contacting us at info@411seniors.org.

7. Accountability

411 Seniors Centre is responsible for your personal information under its control. We have designated a Privacy Officer who is accountable for our compliance with this Privacy Policy.

We may update this Privacy Policy from time to time. Please review this policy periodically for changes.

8. Safeguards

You may opt out of the email Newsletters or other Email Notification by simply clicking on unsubscribe at the bottom of the email.

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that no security measures are perfect or impenetrable.

9. Challenging Compliance/Complaints

You are always free to ask questions about the handling of your personal information.

Complaints

You can make a complaint about 411's handling of your personal information in any form you wish to the 411 Privacy Officer, such as by telephone or in writing; You will be required to prove your identity before discussing any complaint or request that involves your personal information.

Review

If you are not satisfied with how 411 performs its duties under PIPA, or you wish to seek a review of 411's response to your access or correction request, you may contact the Office of the Information and Privacy Commissioner, at:

Mailing address

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

Telephone

(250) 387-5629

Callers outside Victoria can contact the office toll-free by calling Service BC requesting a transfer to **(250) 387-5629**.

Service BC

Vancouver: **(604) 660-2421**

Elsewhere in BC: **(800) 663-7867**

Facsimile

(250) 387-1696

E-mail

info@oipc.bc.caA response that includes the legal reason(s) for the refusal, within 30 business days

10. Contact Information

For further information please contact:

executivedirector@411seniors.oeg

or

president@411seniors.org

or

Confidential Information

c/o 411 Seniors Centre Society 3502 Fraser St. Vancouver, BC V5V 4C5