

Personal Information Protection Policy and Procedures

Approved by: Victoria Zen Centre Society Board

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Responsibility for developing and maintaining this document: Victoria Zen Centre Society Board

Preamble

As part of providing services to the public and to its members the Victoria Zen Centre (VZC) may collect personal information. The *Personal Information Protection Act* ([PIPA](#)) establishes how businesses and not-for-profit organizations in British Columbia may collect, use, retain, and disclose personal information. This policy and the associated procedures are intended to articulate how the VZC complies with [PIPA](#) and to affirm the VZC's commitment to accuracy, confidentiality, and security of personal information.

Policy

Applicability

1. This policy and its associated procedures apply to:
 - a) all individuals within the VZC (including VZC staff, individuals volunteering for the VZC, and individuals who are defined in the Bylaws of the VZC as members of the VZC) who collect personal information in relation to VZC activities;
 - b) any individuals or organizations outside the VZC who are collecting, using, retaining, or disclosing personal information on behalf of the VZC; and
 - c) all personal information under the control of the VZC.

Definitions

2. *Personal information:* as defined in [PIPA](#). In this policy "personal information" means information about an identifiable individual other than contact information (e.g., name, age, home address and phone number, health information, qualifications relating to religious authorization).
3. *Contact information:* as defined in [PIPA](#). In this policy "contact information" means information that would enable an individual to be contacted at a place of business (e.g., name, position name/title, business address, business phone or fax number, business email). Contact information is not covered by this policy or by [PIPA](#).
4. *Privacy Officer:* The individual designated as responsible for ensuring that the VZC complies with this policy and with [PIPA](#).

Responsibilities

5. Any individual within the VZC or acting on behalf of the VZC who collects, accesses, uses, retains, discloses, maintains, or disposes of personal information is in a position of trust, and is thus responsible for:
 - a) making a reasonable effort to familiarize themselves and to comply with [PIPA](#) and this policy and its associated procedures;
 - b) consulting the Privacy Officer if there are any questions regarding the requirements of [PIPA](#) or of this policy and its associated procedures; and
 - c) reporting to the Privacy Officer any suspected breach of [PIPA](#) or of this policy and its associated procedures.

Procedures

Establishing the Purpose of Collecting Personal Information

6. The VZC will only collect personal information that relates directly to, and is necessary for, operations of the VZC, for example:
 - a) to enrol individuals in a VZC course or training program;
 - b) to deliver requested services (e.g., sangha support, members' blog, wedding/funeral ceremony);
 - c) to understand the needs of VZC members and provide effective support to VZC members;
 - d) to enable communication regarding VZC events or other VZC information;
 - e) to enable VZC members to communicate with the organization and with each other regarding VZC activities;
 - f) for planning, evaluation, and statistical purposes;
 - g) for historical and archival purposes; or
 - h) to meet regulatory requirements.
7. Unless the purposes for collecting personal information are obvious and the individual whose information is sought voluntarily provides her or his personal information for those purposes, the purposes for which the personal information are being collected will be communicated (verbally or in writing) before or at the time of collection.

Consent

8. Consent will be obtained to collect, use, or disclose personal information, except as allowed by [PIPA](#), for example:
 - a) in an emergency that threatens an individual's life, health, or personal security, or if there is a need to contact next of kin or a friend of an injured, ill, or deceased individual;
 - b) if the collection, use, or disclosure is clearly in the interests of the individual but consent cannot be obtained in a timely way;
 - c) if the personal information is collected by observation at an event that is open to the public and at which the individual voluntarily appears;
 - d) if the personal information is available from a public source (e.g., telephone directory);
 - e) if necessary to collect a debt owed to the VZC or for the VZC to repay an individual money owed to them by the VZC;
 - f) when disclosure is required by law or as part of a legal investigation; or
 - g) as otherwise permitted by law.
9. Consent may be provided verbally or in writing (including through electronic means), or it can be implied where the purpose for collecting, using, or disclosing the personal information would be considered obvious and the personal information is provided voluntarily for that purpose. Consent may also be considered implied if the individual is given a reasonable opportunity to opt out of his or her personal information being used (e.g., for mailouts) and the individual does not opt out.
10. If consent is withheld or withdrawn for personal information to be used in certain ways, and such a withdrawal or withholding of consent would restrict the VZC in its ability to provide a service, this will be explained to assist the individual in making the decision whether or not to withhold or withdraw his or her consent. Should consent with withheld or withdrawn, the VZC may, at its discretion, as a result not provide the service to that individual.

Using and Disclosing Personal Information

11. Personal information will only be used or disclosed where necessary to fulfill the purpose(s) identified at the time of collection, or for a reasonably related purpose.
12. Personal information will not be used or disclosed for any additional purpose(s) unless consent is obtained to do so.
13. Personal information will not be sold.

Retaining Personal Information

14. If personal information is used to make a decision that directly affects the individual, that personal information will be retained for at least one year so the individual affected has a reasonable opportunity to request access to the information.
15. Subject to Section 16, personal information will only be retained as long as necessary to fulfill the identified purposes or a legal or business purpose. Thereafter, personal information shall be destroyed or the means by which the personal information can be associated with particular individuals shall be removed.

Access, Review, and Accuracy of Personal Information

16. A reasonable effort will be made to ensure that personal information is accurate and complete where it may be used to make a decision or will be disclosed.
17. Individuals have a right to access their personal information and to know how their personal information has been used (including any disclosures), subject to limited exemptions identified in [PIPA](#).
18. Any individual requesting access or correction to their personal information shall submit their request in writing to the Abbot/Abbess or the Privacy Officer. The request should include sufficient detail to identify the personal information being requested and, if applicable, the correction being sought. The Abbot/Abbess shall, upon receipt of such a request, notify the Privacy Officer.
19. Within 30 days of receipt of such a request the Privacy Officer or designated alternate shall review the file with the Abbot/Abbess and respond to the request, or provide written notice of an extension where additional time is required to respond.
20. A minimal fee may be charged for providing access to personal information. If such a fee applies, the VZC shall inform the requestor of the cost and request further direction on whether or not the VZC should proceed with the request.
21. If a request for access is refused in full or in part, the Privacy Officer or designated alternate shall notify the requestor in writing, providing the reasons for refusal and the recourse available.
22. If personal information is demonstrated to be inaccurate or incomplete, the information shall be corrected by the VZC. If the requested correction is not made, the correction request shall be noted in the file along with the reason for not implementing the requested correction.

Securing Personal Information

23. The VZC will make reasonable security arrangements regarding personal information to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal, or similar risks.
24. At the VZC office, the following security measures will be followed so that personal information in the custody of the VZC is appropriately protected:
 - a) Paper files shall be stored in a locked filing cabinet, and shredded when no longer required;
 - b) Electronic files stored on a computer drive or removable media (e.g., CD, diskette) shall be password-protected, and deleted when no longer required; and
 - c) Any service providers performing work for the VZC involving access to personal information (e.g., accountant/bookkeeper) shall be contractually required to provide comparable security measures if any information is to leave the VZC office.
25. Security policies and practices shall be reviewed and updated as technology changes to ensure ongoing personal information security.

Questions, Concerns, and Complaints

26. The Privacy Officer is responsible for ensuring the VZC's compliance with this policy and [PIPA](#).
27. Any complaints, concerns, or questions regarding the VZC's compliance should be submitted in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the Office of the Information and Privacy Commissioner of British Columbia can be contacted.

Contact information for the VZC Privacy Officer:

Frances Bryan

Via VZC office: office@zenwest.ca

Review

28. This policy and associated procedures may be reviewed and revised from time to time, as required by the VZC Board or by changes to [PIPA](#) or other relevant legislation, but no less frequently than every five (5) years.
29. All individuals who might be reasonably be affected by changes to this policy or to associated procedures/guidelines shall be informed of any such changes.