## **Bowser Seniors Housing Society**

Policy Title: Privacy Policy

Policy Number: 04

**Status:** APPROVED BY BOARD **Effective Date:** September 19, 2019

## Overview

The Bowser Seniors Housing Society (Society) is committed to the concept of non-profit rental housing for seniors within their own community. The objective of the Society is to enable local seniors to remain in and enjoy their community long after they reach the point when they need to move on from their current homes. The Directors of the Society strive to achieve transparent and effective governance of its proceedings and stewardship duties to its members, partners and donors.

## Scope

The Society receives private donor, online purchasers, and member information in the form of home addresses, phone numbers, and email addresses. The Board must be respectful and diligent in its protection of this information entrusted to it for the purposes of the Society. This policy applies to any Director, Committee member, member (with a request to review the Society's records) and volunteer, with access to personal information while assisting the Society to achieve its goals.

## **Purpose**

This policy is to provide guidance over the management of private information in line with the Society's privacy obligations. All personal information held at the Society is protected in accordance with the BC privacy legislation and the federal Personal Information Protection and Electronic Documents Act (PIPEDA).

The Society can receive private information in the following ways:

- a) In the completion of a membership form
- b) In the completion of a pledge form (data required to issue a tax receipt)
- c) In the receipt of a personal cheque
- d) In the completion of a raffle ticket
- e) In the receipt of an online transaction notice/order form (CanadaHelps donation, Square payment, membership or event ticket ordering from our website)
- f) In the completion of a volunteer sign up sheet

The Society mitigates risk to personal information by:

- storing data on password secured computers accessible only by the Board members that need access for their Committees (ie Membership Chair); in secured filing cabinets at the Society's records office and at secure sites of our Committee Chairs; and online in Dropbox for file sharing, in a secure password protected area
- limiting authorized access to printed lists holding personal data
- ensuring that printed data is protected from unauthorized access when handled at events
- destroying any physical form/list holding data that is no longer required to be held in compliance with our regulatory obligations (ie raffle ticket stubs, old membership/volunteer lists)

Personal information will only be used by the Society for Society business and will not be disclosed or sold to a third party for any purpose. From time to time, the Society may communicate with our members for participation in market research, notice of Annual General Meetings, assistance with fundraising efforts, or information updates. Refusal of these communications from the Society will in no way affect membership status.

The Society's website offers viewers the opportunity to donate to the Society, pay membership dues, and order event tickets. However, completion of an online transaction that originated on our website will always use another party's secure site to enact the financial portion of the transaction. When the purchaser is informed that they will be leaving our website to make payment, that financial transaction is now governed by that party's Privacy Policy, whose Terms & Conditions must be agreed to prior to the completion of the transaction. At gala events and awareness functions, Board members may also be able to offer purchasers the ability to pay via credit card using a Square. The Society's financial transaction partners include PayPal, Square, CanadaHelps, and Woo Commerce.

The Society strives to maintain the integrity of personal information throughout any manual transcription process ie. transcribing membership information from an individual form to the membership list. Member information is renewed annually, which keeps our records accurate and up-to-date. At any time, a member can contact the Society to update their personal information.

Our bylaws also allow any member to make an appointment to review the books and records of the Society. Under these circumstances, the member will only be given access to pertinent information deemed necessary to the individual situation, provided there is a legitimate need for such access. No fees will be charged for this access.

Should a breach of our Privacy Policy occur, the event is rectified as soon as possible by contact from the Society to those members that have had their information compromised. The President and/or Governance Chair will issue a retraction and/or an apology immediately followed by a review of the incident and the procedures in place to

ensure that a similar incident will not be repeated. If any person wishes to report a breach, they can contact the Governance Chair through our website at www.bshs.ca.

It is the goal of the Society to be as diligent about our efforts to protect this information as we are transparent about how we do this.

This policy is reviewed annually by the Board, or more frequently if necessary. Any resulting revisions will be posted to our website upon receiving Board approval, replacing any previous version, and will be effective immediately.