

Registered Nurses Foundation of British Columbia (RNF)
Personal Information Protection Policy
March 2017

At the RNF, we are committed to providing our donors and applicants with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our donors and applicants, protecting their personal information is one of our highest priorities.

While we have always respected our donors and applicants privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, which sets out the ground rules for how BC businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our donors and applicants of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting donors and applicants personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our donors and applicants personal information and allowing our donors, applicants to request access to, and correction of, their personal information.

Definitions

Personal Information – means information about an identifiable *individual*. *Examples could include: name, home address and phone number, social insurance number, education information, employment information.* Personal information does not include contact information (described below).

Contact information – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.

Privacy Officer – means the individual designated responsibility for ensuring that the RNF complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the donor or bursary applicant voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 We will only collect donor or applicant information that is necessary to fulfill the following purposes:
 - To verify identity;
 - To deliver requested products and services;
 - To send out tax receipts and forms;

- To send out foundation donorship information;
- To contact our donors for fundraising;
- To verify enrolment in an education program; and
- To ensure a high standard of service to our applicants.

Policy 2 – Consent

- 2.1 We will obtain donors’ and applicants’ consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided, in writing or electronically, or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the donor or applicant voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a donor or applicant is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs or fundraising and the donor or applicant does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), donors, applicants can withhold or withdraw their consent for the RNF to use their personal information in certain ways. A donor or applicant’s decision to withhold or withdraw his or her consent to certain uses of personal information may restrict our ability to provide a particular service. If so, we will explain the situation to assist the donor, applicant in making the decision.
- 2.5 We may collect, use or disclose personal information without the donor’s or applicant’s knowledge or consent in the following limited circumstances:
- When the collection, use or disclosure of personal information is permitted or required by law;
 - When the personal information is available from a public source (e.g., a telephone directory);
 - When we require legal advice from a lawyer;
 - To protect ourselves from fraud;
 - To investigate an anticipated breach of an agreement or a contravention of law.

Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only use or disclose a donor or applicant’s personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as:
- To conduct donor or applicant surveys in order to enhance the provision of our services;
 - To contact our donors and applicants directly about services that may be of interest.
- 3.2 We will not use or disclose donor or applicant personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell donor or applicant lists or personal information to other parties.

Policy 4 – Retaining Personal Information

- 4.1 If we use donor or applicant personal information to make a decision that directly affects the donor or applicant we will retain that personal information for at least one year so that the donor, applicant has a reasonable opportunity to request access to it.

- 4.2 Subject to policy 4.1, we will retain donor, applicant personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

Policy 5 – Ensuring Accuracy of Personal Information

- 5.1 We will make reasonable efforts to ensure that donor and applicant personal information is accurate and complete where it may be used to make a decision about the donor or applicant or disclosed to another organization.
- 5.2 Donors and applicants may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought. A request to correct personal information should be forwarded to the Foundation’s Administrative Officer.
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the donor’s or applicant’s correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of donor, applicant personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 The following security measures will be followed to ensure that donors’ and applicants’ personal information is appropriately protected:
- the use of locked filing cabinets and vault;
 - physically securing offices where personal information is held;
 - the use of user IDs, passwords, encryption, and firewalls; and
 - restricting employee access to personal information as appropriate (i.e., only those that need to know will have access).
- 6.3 We will use appropriate security measures when destroying donors and applicants personal information such as shredding documents and deleting electronically stored information.
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Donors, Applicants Access to Personal Information

- 7.1 Donors and applicants have a right to access their personal information, subject to limited exceptions.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Foundation’s Administrative Officer.
- 7.3 Upon request, we will also tell donors and applicants how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may

apply, we will inform the donor or applicant of the cost and request further direction from the donor or applicant on whether or not we should proceed with the request.

- 7.6 If a request is refused in full or in part, we will notify the donor or applicant in writing, providing the reasons for refusal and the recourse available to the donor or applicant.

Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual

- 8.1 The Administrative Officer is responsible for ensuring RNF compliance with this policy and the Personal Information Protection Act.
- 8.2 Donors and applicants should direct any complaints, concerns or questions regarding the RNF compliance in writing to the Foundation’s Administrative Officer. If the Privacy Officer is unable to resolve the concern, the donor or applicant may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for RNF’s Administrative Officer:

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