

Western Canada Chinese Catholic Living Camp

Privacy Policy (2010)

At Western Canada Chinese Catholic Living Camp (WCCCLC), we are committed to providing our campers with a conducive atmosphere for young people to renew their faith and embrace their lives. As we collect, use and disclose personal information in order to maintain active dialogue amongst our campers, we strive to protect their personal information provided by them with utmost respect.

While we have always respected our campers' 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, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our campers 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 Privacy Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting our campers' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our campers' personal information and allowing our campers to request access to, and correction of, their personal information.

Definitions

Personal Information—means information about an identifiable individual. Personal information includes information that relates to their personal characteristics (e.g. name, home address etc.), their health (e.g. medical condition etc.) or their activities and views (e.g. religion, language preference etc.). 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 with a designated responsibility to ensure that WCCCLC complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

1.1 Unless the purposes for collecting personal information are obvious and the camper 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 camper information that is necessary to fulfill the following purposes:

- To publish a camper directory with camper personal contact information, including name, home phone number and e-mail address, in the camp handbook. Each participating camper is entitled to receive a printed copy of the handbook that includes the directory. All campers are given the option to opt-out from publishing their personal information in the camp handbook on the Registration Form.
- To make appropriate room and sharing group arrangements, we may collect personal information such as name, gender, age, marital status, language preference, religion and home parish.
- To assist in making transportation arrangements: Each Bus Leader is provided a list of bus riders with their names, home phone numbers, pager or mobile phone numbers and boarding locations. The Bus Leader(s) is/are responsible for ensuring that all campers are on board before departure at each stop. In cases of missing camper(s) and/or emergency, the Bus Leader(s) may use such list to contact appropriate parties (e.g. WCCCLC Core Team and the campers' emergency contact(s)) accordingly.
- To provide emergency contact information to ensure appropriate first-aid treatments and/or arrangements for qualified medical or surgical attention for our campers, if it should be required in the event of emergency.
- To determine the appropriate camp fee to be charged based on the employment status of each camper.
- To provide data for analysis of camper profile in development of future promotion strategies. Examples of information collected for this purpose include home address, home parish, gender, age, marital status, language preference, religion and history with WCCCLC.
- To subscribe newly registered campers onto the e-mail list (wccclc@yahoogroups.com) and to renew all returning campers' existing subscription. All campers are given the option to opt-out from including their e-mail addresses for this purpose on the Registration Form.
- To enable that our campers are being informed about WCCCLC pre-camp meeting, post-camp meeting and other activities organized by WCCCLC.

Policy 2 – Consent

- 2.1 We will obtain campers' 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, electronically (i.e. through online registration and e-mail) or it can be implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the camper voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a camper has been given notice and a reasonable opportunity to opt-out of his or her personal information being included in the contact list in the camp handbook or on the WCCCLC e-mail list (wccclc@yahoogroups.com), and the camper 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), campers can withhold or withdraw their consent for WCCCLC to use their personal information in certain ways. A camper's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to maintain active dialogue with the camper. If so, we will explain the situation to assist the camper in making the decision.
- 2.5 We may collect, use or disclose personal information without the camper's knowledge or consent in the following limited circumstances:
- When the collection, use or disclosure of personal information is permitted or required by law;
 - In an emergency that threatens an individual's life, health, or personal security;
 - When the personal information is available from a public source (e.g., a telephone directory);
 - When we require legal advice from a lawyer;
 - For the purposes of collecting a debt;
 - To protect ourselves from fraud;
 - Other circumstances listed under *Personal Information Protection Act*.

Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only use or disclose camper personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes listed under policy 1.2.
- 3.2 We will not use or disclose camper personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell camper lists or personal information to other parties.

Policy 4 – Retaining Personal Information

- 4.1 If we use camper personal information to make a decision that directly affects the camper, we will retain that personal information for at least one year so that the camper has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain camper personal information only as long as necessary to fulfill the purposes identified in policy 1.2.

Policy 5 – Ensuring Accuracy of Personal Information

- 5.1 We will make reasonable efforts to ensure that camper personal information is accurate and complete where it may be used to make a decision about the camper or disclosed to another organization.
- 5.2 Campers 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 Privacy 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 campers' correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of camper 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 camper personal information is appropriately protected:
- Information collected through paper and on-line Registration Form of WCCCLC will be stored in a secured, password-protected database with limited access. From time to time, information will be extracted from the database and disclosed to the volunteers for the year for the purposes listed in policy 1.2. We will ensure that individuals who have access to such information are familiar with this Privacy Policy and will only collect, use and disclose personal information as appropriate for the purposes as described in policy 1.2 in accordance with *Personal Information Protection Act's* privacy principles and this Privacy Policy.

The database used will be retained for at least one year after the last day the camp. The paper Registration Form containing the personal information of our campers will be retained in a binder and will be destroyed one year after the last day of the camp.

- Information collected through the Medical Waiver Form will be kept in a binder and will be destroyed one year following the last day of the camp. Access to the information collected will be limited to the Finance and Administration Coordinator and relevant personnel within the Campsite and Hospitality team.

6.3 We will continually review and update our security policies and controls to ensure ongoing personal information security.

Policy 7 – Providing Campers Access to Personal Information

7.1 Campers have a right to access their personal information, except when:

- the disclosure could reasonably be expected to threaten the safety or physical or mental health of an individual other than the individual who made the request;
- the disclosure can reasonably be expected to cause immediate or grave harm to the safety or to the physical or mental health of the individual who made the request;
- the disclosure would reveal personal information about another individual;
- the disclosure would reveal the identity of an individual who has provided personal information about another individual and the individual providing the personal information does not consent to disclosure of his or her identity.
- the disclosure is not required under section 23(3) of the *Personal Information Protection Act*.

If any of the information in a WCCCLC document meets the above criteria, that information will be removed. The remaining information would then be given to the individual who made the request.

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 correct personal information should be forwarded to the Privacy Officer.

7.3 Upon request, we will also inform the campers 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 If a request is refused in full or in part, we will notify the camper in writing, providing the reasons for refusal and the recourse available to the camper.

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

- 8.1 The Finance and Administration Coordinator (FAC) each year will be designated as the Privacy Officer for the camp that year.
- 8.2 The Privacy Officer is responsible for ensuring WCCCLC's compliance with this policy and the *Personal Information Protection Act*.
- 8.3 Campers should direct any complaints, concerns or questions regarding WCCCLC's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the camper may also write to the Information and Privacy Commissioner of British Columbia.
- 8.4 Complaints regarding WCCCLC's compliance will be handled in the manner outlined in the Addendum to this Policy.

Contact information for WCCCLC Privacy Officer

WCCCLC Finance and Administration Coordinator

Mailing address:

WCCCLC

c/o Canadian Martyrs Catholic Church

5771 Granville Avenue

Richmond, B.C.

V7C 1E8 Canada

E-mail address: wccclc.info@gmail.com

Miscellaneous Information

1. We will abide to the *Personal Information Protection Act* with the general principles as described in this policy when collecting personal information from the participants in WCCCLC-related activities.
2. This policy, effective November 1, 2005 and subject to change without notice, is updated as of May 1, 2007 and February 19, 2010.

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Privacy Policy—Addendum (2010)

Complaint Handling Process

1. The Privacy Officer will be responsible for receiving and handling complaints about WCCCLC's compliance with the *Personal Information Protection Act* (the "Act"). The Advisors (Fr. Paul Chu and Sr. Cecilia Cham) of WCCCLC will also be notified about the complaints.
2. WCCCLC will ensure that the complaint process is fair, impartial and confidential. To this end, should a complaint be directed towards the Privacy Officer or a Core Team member (who is not a Privacy Officer) will be appointed as an investigator to investigate the complaint on the Privacy Officer's behalf.
3. Complaints about WCCCLC's compliance with the Act may be filed verbally, in writing or by e-mail to the Privacy Officer.
4. When the complaint is received by the Privacy Officer, the date the complaint was received will be recorded.
5. If the complaint was received verbally, the nature of the complaint (e.g. delays in responding to a request, incomplete or inaccurate responses, or improper collection, use, disclosure or retention) will be recorded.
6. The Privacy Officer will acknowledge receipt of the complaint promptly.
7. The Privacy Officer (or the appointed personnel) will contact the individual to clarify the complaint, if necessary.
8. The Privacy Officer and the investigator will be given access to all relevant records and other individuals who handled the personal information or access request.
10. Where the complaint is justified, WCCCLC will take appropriate measures to rectify the situation, including correcting information handling practices and policies where necessary and communicating those changes to relevant staff.
11. The Privacy Officer (or the appointed personnel) will notify individuals of the outcome of investigations clearly and promptly, informing them of any relevant steps taken.
12. All decisions will be recorded to ensure consistency in applying the Act.
13. There will be follow up to verify that required changes to policies, procedures or practices have been undertaken.