



**Personal Information Protection
Private Sector Privacy Legislation
Personal Information Protection Policy**

**BC Cherry Association (BCCA)
Personal Information Protection Policy**

At the BCCA, we are committed to providing our members, sponsors, and other business contacts with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our members, sponsors, and other business contacts, protecting their personal information is one of our highest priorities.

While we have always respected our members, sponsors, and other business contacts' 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 members, sponsors, and other business contacts 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 members, sponsors, and other business contacts' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our members, sponsors, and other business contacts' personal information and allowing our members, sponsors, and other business contacts to request access to, and correction of, their personal information.

Scope of this Policy

This Personal Information Protection Policy applies to the BC Cherry Association.

This policy also applies to any service providers collecting, using, or disclosing personal information on behalf of the BC Cherry Association.

Definitions

Personal Information – means information about an identifiable *individual*. 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 BC Cherry Association complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the members and clients 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 member and client information that is necessary to fulfill the following purposes:
 - To verify identity;
 - To identify members, sponsors, and other business contacts' preferences;
 - To deliver requested products and services
 - To enrol the client in a program;
 - To verify compliance in programs for international export of fruit;
 - To send out association membership information;
 - To contact our sponsors for fundraising;
 - To ensure a high standard of service to our members, sponsors, and other business contacts;
 - To meet regulatory requirements;
 - To assess winning entries and arrange prize distribution in the case of contests or giveaways.

Policy 2 – Consent

- 2.1 We will obtain member, sponsor, and other business contact 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 orally, electronically, or through an authorized representative, or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the member, sponsor, or other business contact voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a member, sponsor, or other business contact is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, and the member, sponsor, or other business contact 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), members, sponsors, or other business contacts can withhold or withdraw their consent for the BC Cherry Association to use their personal information in certain ways. A member's, sponsor's, or other business contact's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist

the member, sponsor, or other business contact in making the decision.

2.5 We may collect, use or disclose personal information without the member's, sponsor's, or other business contact'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;
- 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 member, sponsor, or other business contact 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 member, sponsor, or other business contact surveys in order to enhance the provision of our services;
- To contact our [clients, customers, members] directly about products and services that may be of interest;]

3.2 We will not use or disclose member, sponsor, or other business contact personal information for any additional purpose unless we obtain consent to do so.

3.3 We will not provide member, sponsor, or other business contact lists or personal information to other parties unless we have consent to do so.

Policy 4 – Retaining Personal Information

4.1 If we use member, sponsor, or other business contact personal information to make a decision that directly affects the member, sponsor, or other business contact, we will retain that personal information for at least one year so that the member, sponsor, or other business contact has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, we will retain member, sponsor, or other business contact 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 member, sponsor, or other business contact personal information is accurate and complete where it may be used to make a decision about the member, sponsor, or other business contact or disclosed to another organization.

5.2 Members, sponsors, or other business contacts 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.

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 members', sponsors', or other business contacts' correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of member, sponsor, or other business contact 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 member, sponsor, or other business contact personal information is appropriately protected:

The use of user IDs, passwords, encryption, firewalls; restricting employee access to personal information as appropriate (i.e., only those that need to know will have access); contractually requiring any service providers to provide comparable security measures, and destruction of personal information that is not required to be kept beyond a one-time use.
- 6.3 We will use appropriate security measures when destroying member's, sponsor's, or other business contact's personal information such as shredding documents and securely 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 Members, Sponsors, or Other Business Contacts Access to Personal Information

- 7.1 Members, sponsors, or other business contacts 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.
- 7.3 Upon request, we will also tell members, sponsors, or other business contacts 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 member, sponsor, or other business contact of the cost and request further direction from the member, sponsor, or other business contact 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 member, sponsor, or other business contact in writing, providing the reasons for refusal and the recourse available to the member, sponsor, or other business contact.

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

- 8.1 The Privacy Officer **or designated individual** is responsible for ensuring the BC Cherry Association's compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Members, sponsors, or other business contacts should direct any complaints, concerns or questions regarding the BC Cherry Association's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the member, sponsor, or other business contact may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for BC Cherry Association's Privacy Officer or designated individual:

admin@bccherry.com