



Strata Corporation VIS xxxx

Personal Information Protection

Personal Information Protection Policy

At VIS xxxx we are committed to providing owners and residents with lawful service. As providing this service involves the collection, use and disclosure of some personal information about our owners and residents, protecting their personal information is one of our highest priorities.

While we have always respected the privacy of our owners and residents 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 owners and residents 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 owners' and residents' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our owners' and residents' personal information and allowing them to request access to, and correction of, their personal information.

XYZ Management Corporation has been contracted by the Owners of Strata xxxx to act as agents on their behalf. As agents all owner related information is dealt with in a manner compliant with this existing privacy legislation.

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 Strata xxxx complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the owner or resident 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 owner or resident information that is necessary to fulfill the following purposes:
 - To verify identity;
 - To communicate with owners and residents;
 - To identify owner communication preferences;
 - To collect and process strata fee payments and other payments’
 - To deliver requested services;
 - To ensure the orderly management of the strata corporation;
 - To allow for the use of video surveillance to ensure the safety of owners, residents and guests;
 - To respond to emergencies;
 - To meet regulatory requirements;

EXAMPLES: Personal information that is collected may include:

- *Name, address, email address, and telephone numbers;*
- *Banking information;*
- *Emergency contact information;*
- *Vehicle description and license plates;*
- *Pet information;*
- *Names of family members living with an owner or occupying the strata lot.*

Policy 2 – Consent

- 2.1 We will obtain owner/resident 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 by filling in a form supplied by the strata corporation or its designated management, or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the owner/resident voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where an owner/resident is given notice and a reasonable opportunity to opt-out of his or her personal information being used for email notices and the owner/resident 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), owners and residents can withhold or withdraw their consent for Strata xxxx to use their personal information in certain ways. An owner or resident’s decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or document. If so, we will explain the situation to assist the owner or resident in making the decision.
- 2.5 We may collect, use or disclose personal information without the owner’s or resident’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 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 owner/resident 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 fulfill information requests as permitted under S.36 of the Strata Property Act;
 - To conduct owner/resident surveys in order to enhance the provision of our services;
 - To contact our owners/residents directly about information, meetings and services that may be of interest
- 3.2 Video camera footage may be provided to law enforcement officials if it may provide evidence in a criminal investigation.
- 3.3 We will not use or disclose owner or resident personal information for any additional purpose unless we obtain consent to do so.
- 3.4 We will not sell owner or resident lists or personal information to other parties.

Policy 4 – Retaining Personal Information

- 4.1 If we use owner or resident personal information to make a decision that directly affects the owner or resident, we will retain that personal information for at least one year so that the owner or resident has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain owner or resident personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose, and as required by the Strata Property Act.
- 4.3 Video camera footage is kept for 14 days only, after which time it is over-written.

Policy 5 – Ensuring Accuracy of Personal Information

- 5.1 We will make reasonable efforts to ensure that owner or resident personal information is accurate and complete where it may be used to make a decision about the owner or resident or disclosed to another organization.
- 5.2 Owners and residents 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 [or designated individual.
- 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 owner's or resident's correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of owner and resident 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 owner and resident personal information is appropriately protected:
- Locked filing cabinets
 - Physically securing offices where personal information is held
 - The use of user ID's and password for the strata corporation's email account (gmail);
 - Restricting 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.
- 6.3 Video camera receiver is located in a locked room, with limited and controlled access.
- 6.4 We will use appropriate security measures when destroying owners' and residents' personal information such as shredding documents, and deleting electronically stored information.
- 6.5 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Owners and Residents Access to Personal Information

- 7.1 Owners and residents have a right to access their personal information, subject to limited exceptions. Exceptions to access include: solicitor-client privilege, disclosure would reveal personal information about another individual, health and safety concerns.
- 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 Privacy Officer or designated individual.
- 7.3 Upon request, we will tell owners and residents how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 Except as otherwise provided for in the Strata Property Act, 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 Except as otherwise provided for in the Strata Property Act, a minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the owner or resident of the cost and request further direction from the requestor 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 owner or resident in writing, providing the reasons for refusal and the recourse available to the requestor.

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 Strata xxxx's compliance with this policy and the *Personal Information Protection Act*. The Secretary of the Strata Council is the Privacy Officer and may be reached at: (council email address)
- 8.2 Owners and residents should direct any complaints, concerns or questions regarding Strata xxxx's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the owner or resident may also write to the Information and Privacy Commissioner of British Columbia.