

Date Approved/Amended: October 14, 2009/January 2018/May 2020

Approved by: Chief Executive Officer

Subject: Personal Information Protection Policy (Client)

Policy Statement

We are committed to providing our clients with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our client and their members, protecting their personal information is one of our highest priorities.

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

Scope of this Policy

This Personal Information Protection Policy applies to COHO Management Services Society and the housing co-operatives it professionally manages.

This policy also applies to any service providers collecting, using or disclosing personal information on behalf of COHO Management Services Society.

Definitions

Personal Information	means information about an identifiable individual which includes but is not limited to name, age, address, phone number, income, medical information and 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 COHO Management Services Society complies with this policy and PIPA
Management Contract	means the contract between the housing co-operative and COHO Management Services
Client	means the housing co-operative that has contracted with COHO to provide management services
Member	means the resident or residents of the housing co-operative that has contracted with COHO to provide management services

1. Collecting Personal Information

Unless the purposes for collecting personal information are obvious and the member voluntarily provides their 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. Unless the management contract specifies otherwise or the housing

We will only collect member information that is necessary to fulfill the following purposes:

- i. To verify identity and credit worthiness, we may collect name, home address, telephone number, birth date and social insurance numbers
- ii. To verify that a member or potential member is legally entitled to live and work in

Canada

- iii. To identify member preferences
- iv. To collect and process payment of housing charges we may collect financial and banking information from members
- v. To ensure a high standard of service to our clients
- vi. To meet audit requires
- vii. To assess suitability of membership

2. Consent

- 2.1 We will obtain member consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent). Consent can be provided orally, in writing 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 voluntarily provides personal information for that purpose.
- 2.2 If an individual provides reasonable notice to COHO that they withdraw consent to the collection, use or disclosure of the individual's personal information, COHO will inform the individual of the likely consequences if any, of withdrawing consent.
- 2.3 COHO will not prohibit an individual from withdrawing consent to the collection, use or disclosure of the individual's personal information, unless the withdrawal of consent would frustrate the performance of a legal obligation. We may collect, use or disclose personal information without the members' knowledge or consent in the following limited circumstances:
- i. When the collection, use or disclosure of personal information is permitted or required by law
 - ii. In an emergency that threatens an individual's life, health or personal security
 - iii. When the personal information available is from a public source
 - iv. When seeking legal advice
 - v. For the purposes of collecting a debt
 - vi. To protect from fraud
 - vii. To investigate an anticipated breach of an agreement or a contravention of law

3. Using and Disclosing Personal Information

We will only use or disclose member personal information where necessary to fulfill the purposes identified at the time of collection or to conduct member surveys in order to enhance the quality of our surveys or at the request of the housing co-operative.

We will not use or disclose member personal information for any additional purpose unless we obtain consent to do so. We will not sell personal information of members or clients to other parties unless we have the consent to do so.

4. Retaining Personal Information

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

5. Ensuring Accuracy of Personal Information

- 5.1 We will make reasonable efforts to ensure that member personal information is accurate and complete where it may be used to make a decision about the member or disclosed to another organization.
- 5.2 Members 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, during the year **before** the date the correction was made. If the correction is not made, we will note the members' correction request in their file.

6. Ensuring Accuracy of Personal Information

- 6.1 We are committed to ensuring the security of member personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 To ensure that member personal information is appropriately protected, paper files containing information will be stored in locked filing cabinets. Electronic files will be stored on a secure network and within COHO's property management cloud-based property management program. Access to electronic and paper files is limited to only those that need to have access such as employees and the housing co-operative's board of directors. Equipment where personal information is accessed will be protected using complex passwords.
- 6.2 We will use appropriate security measures when destroying member personal information including shredding paper documents, deleting and wiping electronically stored information.
- 6.3 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

7. Providing Clients, Residents, Tenants Access to Personal Information

- 7.1 Members have a right to access their personal information except where disclosure would reveal personal information about another individual or in the case of health and safety concerns. When COHO receives a request for access to personal information from a person other than the client, COHO will promptly advise the person to make the request to the client, unless the contract expressly requires COHO to provide such access and provides the name or title and contact information of an official of the client to whom such requests are to be made.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.

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

The client will designate an individual to act as the privacy officer for ensuring COHO Management's compliance with this policy and the Personal Information Protection Act.



Members and clients should direct any complaints, concerns or questions regarding COHO's compliance in writing to the client's designated privacy officer. If the privacy officer is unable to resolve the concern, the member or clients may also write to the Information and Privacy Commissioner of British Columbia as follows:

Office of the Information and Privacy Commissioner for British
Columbia PO Box 9038 Stn. Prov. Govt.
Victoria B.C. V8W 9A4