

**UNIVERSITY OF VICTORIA FOUNDATION
PERSONAL INFORMATION PROTECTION
POLICY**

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**UNIVERSITY OF VICTORIA FOUNDATION
Personal Information Protection Policy**

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

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

Scope of this Policy

This Personal Information Protection Policy applies to University of Victoria Foundation and any service providers collecting, using or disclosing personal information on behalf of University of Victoria Foundation.

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 University of Victoria Foundation 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 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 information that is necessary to fulfill the following purposes:

- To identify donor preferences;
- To open and manage an endowment fund;
- To deliver receipts and endowment reports;
- To send out association membership information;
- To contact donors for fundraising activities;
- To ensure a high standard of service to our donors; and
- To meet regulatory requirements;

Policy 2 – Consent

2.1 We will obtain donor 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, in writing, 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 donor voluntarily provides personal information for that purpose.

2.3 Consent may also be implied where a donor 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 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 can withhold or withdraw their consent for the University of Victoria Foundation to use their personal information in certain ways. A donor'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 donor in making the decision.

2.5 We may collect, use or disclose personal information without the donor's knowledge or consent in the limited circumstances described in sections 12, 15 and 18 of PIPA, which include :

- The collection, use or disclosure is clearly in the interest of the donor and consent cannot be obtained in a timely way;
- 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;
- To protect ourselves from fraud;

Policy 3 – Using and Disclosing Personal Information

3.1 We will only use or disclose donor personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes.

3.2 We will not use or disclose donor personal information for any additional purpose unless we obtain consent to do so.

3.3 We will not sell donor lists or personal information to other parties.

Policy 4 – Retaining Personal Information

- 4.1 If we use donor personal information to make a decision that directly affects the donor, we will retain that personal information for at least one year so that the donor has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain donor 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 personal information is accurate and complete where it may be used to make a decision about the donor or disclosed to another organization.
- 5.2 Donors 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 donor's correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of donor 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 donor personal information is appropriately protected through:
 - The use of locked filing cabinets;
 - Physically securing offices where personal information is held;
 - The use of IDs, passwords, encryption, and firewalls;
 - Restricting employee access to personal information as appropriate; and
 - Contractually requiring service providers to provide comparable security measures.
- 6.3 We will use appropriate security measures when destroying donors' 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 Access to Personal Information

- 7.1 Donors have a right to access their personal information, subject to limited exceptions described in section 23 of PIPA.
- 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 donors 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 of the cost and request further direction from the donor 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 in writing, providing the reasons for refusal and the recourse available to the donor.

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 University of Victoria Foundation's compliance with this policy and the Personal Information Protection Act.
- 8.2 Donors should direct any complaints, concerns or questions regarding University of Victoria Foundation's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the donor may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for University of Victoria Foundation's Privacy Officer or designated individual:

Ms. Carrie Andersen
Privacy Officer and Secretary to the University of Victoria Foundation
Office of the University Secretary
University of Victoria
PO Box 1700 STN CSC
Victoria, BC V8W 2Y2

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