



BRIDGES

FOR WOMEN SOCIETY

Privacy Policy

RATIONALE: Bridges for Women has developed this privacy policy to express our commitment to being transparent and accountable to our participants, employees, volunteers, board members, supporters and stakeholders. The procedures relating to participants, employees, supporters, donors and stakeholders in the way we handle personal information.

As a not-for-profit organization in British Columbia (BC), we are governed by the *Personal Information Protection Act* (“PIPA”) which sets out the rules for how we can collect, use and disclose personal information. This privacy policy has been developed in accordance with PIPA and the Principles of Privacy Protection.

APPLICATION: This policy applies to the collection, use and disclosure of personal information of our participants, employees, volunteers, board members, supporters and stakeholders. The procedures relating to participants, employees, supporters, donors and stakeholders will vary depending on the situation, but this policy will apply to all collections, uses and disclosures.

DEFINITIONS:

Personal information: Information about an identifiable individual, including a person’s name, contact information (address, phone number, email), social insurance number (this is required by our government funders), income, image, and sensitive details such as histories (this may include health, employment, social and family details).

Employee personal information: Information collected, used and disclosed exclusively for the purpose of establishing, maintaining, managing or terminating employment. This includes volunteers.

Employee personal information does not include work contact information (position name / title, work telephone, work email, etc). Employee personal information also does not include work product information – information prepared or collected by an individual as part of that individual’s work responsibilities.

Consent: When permission is given for an action. Consent must be freely given, specific, and well informed. Consent can be implicit or explicit.

Implicit Consent: Individuals are considered to have given implied consent when the purpose for collecting, using or disclosing is obvious and the individual voluntarily provided their personal information for that obvious purpose.

Withdrawal of Consent: To take away permission after giving it.

Privacy Commissioner: The Privacy Commissioner informs and advises inquirers about protecting their personal information.

Privacy Officer:

The Privacy Officer is the first point of contact when privacy issues arise. The Privacy Officer is responsible for intervening on privacy issues relating to any of Bridge’s operations and informing and advising inquirers about protecting personal information. A privacy officer is also responsible for:

- Conducting a privacy audit and self-assessment
- Being a part of privacy policy development
- Implementing and maintaining a privacy policy
- Managing privacy training
- Responding to requests for access to and correction of personal information
- Addressing and processing privacy complaints
- Working with the Information and Privacy Commissioner in the event of an investigation

The Privacy Officer can be contacted at the following email address:
privacyoffice@bridgesforwomen.ca

The Privacy Officer may delegate to another individual the duty conferred by that designation.

Personal Information Protection Act: The Personal Information Protection Act (PIPA) governs privacy in therefore private sector organizations. PIPA describes how all private sector organizations must handle the personal information of its employees and the public and creates common-sense rules about collecting, using and disclosing that personal information. PIPA intends to balance the following two principles:

- An individual’s right to protect his or her personal information, and
- An organization’s need to collect, use or disclose personal information for reasonable purposes (section 2 of PIPA)

Privacy Breach: A Privacy Breach occurs when there is unauthorized access to or collection, use, disclosure or disposal of personal information. Such activity is “unauthorized” if it occurs in violation with the Personal Information Protection Act.

Principles of Privacy Protection: The 10 Principles of Privacy Protection are internationally recognized by most privacy legislation. The principles inform the privacy policy, and how Bridges uses, collects, discloses and safeguards personal information. These principles include the following:

- Be Accountable
- Identify Purpose
- Obtain Consent
- Limit Collection
- Limit Use, Disclosure and Retention
- Be Accurate
- Use Appropriate Safeguards:

- Be Open
- Give Individual Access
- Provide Resources

PRIVACY POLICY:

Bridges for Women will only collect and use personal information that is necessary to fulfill the purposes set out in this policy. If personal information is collected for a new purpose, the new purpose will be added to this policy, and the consent will be obtained prior to use.

Bridges for Women will disclose personal information only for the purposes for which information was collected, except where authorized or required by law. This would include if we were presented with a court order, subpoena or search warrant.

Bridges for Women will not collect, use or disclose personal information for any other purposes without getting further consent from the individual.

Bridges for Women will only collect, use and disclose personal information in accordance with PIPA.

Collection, use and disclosure

Bridges for Women collects, uses and discloses the following pieces of personal information for the following purposes:

a) Participants:

- We collect and use personal information from potential participants to assess them for suitability in our programs.
- We collect and use personal information from participants to enroll them in our programs, to deliver our programs and to manage participation in our programs.
- We disclose a limited amount of personal information in accordance with our funding contracts. This personal information varies depending on which program a participant is enrolled in. The information that we disclose is done in accordance with our government contracts and the privacy laws in BC. For more details you can speak with the Bridges for Women programs manager and or Privacy Officer.
- There may be other times that we use or disclose participant personal information. When we do, we will get participant consent unless the law says that we can or must disclose the information without consent. Some examples of when we do not need to get consent include: if it is necessary for medical treatment of the individual and the individual is unable to give consent or if it is required by law.

b) Employees, Volunteers and Board Members:

- We collect, use and disclose employee, volunteer, and board member personal information exclusively for the purpose of establishing, maintaining, managing or terminating employment.

c) Supporters, Donors and Stakeholders:

- We collect and use supporter, donor and stakeholder personal information for the purposes of tracking attendance at events, maintaining our list of supporters and donors, and issuing tax receipts for eligible donations. Personal information collected and used for these purposes includes name, address, email address, donation or support history. We will only use your name and contact information to contact you if you consent to receiving ongoing communication. You may choose to revoke your consent at any point by contacting community@bridgesforwomen.ca.

Consent and notification

Bridges for Women will get individuals' consent to collect, use and disclosure their personal information. Bridges will notify individuals of the purpose for collecting their personal information on or before collection. In accordance with PIPA, consent can be expressed (verbal or in writing) or it can be implied. Individuals are considered to have given implied consent when the purpose for collecting, using or disclosing is obvious and the individual voluntarily provided their personal information for that obvious purpose.

Individuals have the right to withdraw their consent at any time. Bridges must explain the likely consequences for withdrawing consent. For example, if a participant withdraws consent for us to use their personal information, we may not be able to continue providing programming to that individual.

PIPA does allow the collection, use and disclosure of information without consent in some circumstances. Some examples include: if it is necessary for medical treatment of the individual and the individual is unable to give consent or if it is required by law.

Security

Bridges for Women has physical, technical and administrative safeguards in place to protect the personal information in our custody or control. This includes, but is not limited to: locked office doors and filing cabinets, password protected workstations, use of password protected access to folders, permitted based on one's role, from Bridges cloud when working from home. See [Google Drive's Privacy Policy](#) for more information on cloud protection. Notably, Bridges for Women's cloud servers are located within Canada. Bridges employee's passwords are securely stored in a password vault, OnePassword, for an added layer of protection. Bridges for Women's system operates on Microsoft 365 which meets the requirements outlined by PIPA. Additionally, Bridges limits access to personal information on a "needs to know basis". Need to know means that only those individuals who need to have the information to do their job or to fulfill the purpose of the collection will have access to the information.

Retention

Personal information that is used to make a decision about an individual will be retained (or kept) for at least one year, as required by PIPA. However, Bridges for Women recognizes that keeping personal information longer than it is needed is a security risk and will only keep

personal information if necessary to fulfill the purpose of the collection. Our government contracts determine how long some personal information must be kept. All information that is no longer needed will be securely disposed of.

Privacy Breach / Breach Management

In the event a privacy breach occurs, Bridges for Women is committed to taking proactive steps to contain information, evaluate risk and mitigate future breaches. Employees who identify a privacy breach must report the incident to their immediate supervisor. The supervisor and the employee are responsible for reporting the breach to the Privacy Officer. If possible, the employee in collaboration with their supervisor is responsible for immediately containing the breach. For example, employees may recover the record or shut down a system in order to stop the unauthorized practice.

Once the privacy breach is discussed and necessary information is provided to the Privacy Officer, the Privacy Officer may conduct an investigation in accordance with the complaints investigation section of this privacy policy.

Once a privacy breach is understood or has been investigated by the Privacy Officer, all parties affected by the breach will be contacted.

Investigations will:

- be undertaken in a timely manner, with diligence, and as thoroughly as possible.
- be fair and impartial, providing both the complainant and respondent equal treatment in evaluating the allegations.
- be sensitive to the interests of all parties involved, and maintain confidentiality.
- be diligent in recording evidence accurately
- draw a conclusion based on facts and evidence
- incorporate, where appropriate, any need or request from the complainant or respondent for assistance during the investigation process.

The Privacy Officer will use information gathered during the investigation to determine a solution that a reasonable person would believe to be fair. The solution drawn, will ensure Bridges address any systemic or ongoing privacy compliance concerns.

Solutions may include updating Bridges for Women's policies and procedures or providing additional training. Any solutions drawn by the Privacy Officer will be documented and the complainant will be informed of the outcome. If necessary, employees and board members of Bridges for Women may also be informed of changes to policy and procedure made as a result of the complaint. If the Privacy Office feels the privacy complaint requires further attention an investigation will be initiated by the Privacy Officer.

Breaches that involve employees should be referred to the HR Manual.

Complaints

How Complaints are received: Complaints must be submitted to the privacy officer in writing with enough detail to allow Bridges for Women to identify the information, the person involved, and the action/ correction being sought. Information that should be included in the complaint includes, what personal information was involved and what happened to the information, when and where did the incident occur, who was involved in the incident, and any evidence proving the event occurred as stated in the complaint. When the privacy complaint is received by the Privacy Officer, it will be documented with the date received.

How Complaints are investigated: When the Privacy Officer receives a privacy complaint they will notify the complainant that they have received it. The Privacy Officer will then review the complaint promptly. If the Privacy Officer feels the complaint requires additional information to proceed, they will contact the complainant. The Privacy Officer will then investigate the complaint.

Accuracy, access, and complainants

Bridges for Women makes all reasonable efforts to make sure that the personal information that we collect, use and disclose is accurate and complete.

Individuals have the right to access their personal information and to request corrections.

Individuals have the right to know what data has been collected and how their data is used and disclosed.

To obtain access to personal information or request a correction, individuals must submit written requests to the address below. Written requests must include enough detail to allow Bridges to identify the individual and the personal information or correction being sought.

Individuals can contact Bridges for Women with any questions or complaints at:

Name of Privacy Officer Here
Bridges for Women Society
219-645 Fort Street. V8W-1G2

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privacyoffice@bridgesforwomen.ca

If you are not satisfied with the way that Bridges for Women responds to requests or complaints, you can contact the Office of the Information and Privacy Commissioner for British Columbia and file a formal complaint with the Privacy Commissioner.

This policy will be regularly reviewed to ensure it complies with the Personal Information Protection Act.