

Kelowna's  
Gospel Mission

# Kelowna Gospel Mission Society

## Personal Information Protection Policy

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

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

### *Scope of this Policy:*

This Personal Information Protection Policy applies to Kelowna Gospel Mission Society and its subsidiaries, Men's Hostel, Destiny House, Harmony House, Shiloh House, Dental Clinic and Helping Hands Thrift Store.

This policy also applies to any service providers collecting, using or disclosing personal information on behalf of Kelowna Gospel Mission Society.

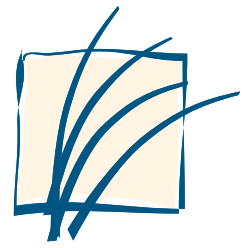
### *Definitions*

*Personal Information* – means information about an identifiable individual, including name, age, home address and phone number, social insurance number, marital status, religion, income, credit history, medical information, education, 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.

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## Personal Information Protection Policy (cont.)

*Privacy Officer* – means the individual designated responsibility for ensuring that Kelowna Gospel Mission Society complies with this policy and PIPA.

### *Policy 1 – Collecting Personal Information*

1.1 Unless the purposes for collecting personal information are obvious and the client and 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 clients' and donors' information that is necessary to fulfill the following purposes:

- To verify identity
- To verify creditworthiness
- To identify clients and donors preferences
- To understand the financial and banking needs of our clients and donors
- To facilitate donor preferences
- To deliver requested services
- To provide medical, dental, and counseling services
- To enroll the client in a program
- To send out association membership information
- To contact our donors for fundraising
- To ensure a high standard of service to our clients and donors
- To meet regulatory requirements
- To assess suitability for tenancy
- To collect and process rent payments

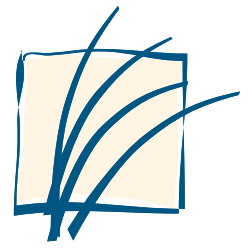
### *Policy 2 – Consent*

2.1 We will obtain clients and donors 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, 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 clients and donors voluntarily provides personal information for that purpose.

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## Kelowna Gospel Mission Society Personal Information Protection Policy (cont.)

2.3 Consent may also be implied where a client and 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 clients and donors do 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), clients and donors can withhold or withdraw their consent for Kelowna Gospel Mission Society to use their personal information in certain ways. A clients and donors 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 clients and donors in making the decision.

2.5 We may collect, use, or disclose personal information without the clients and donors 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
- 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 clients and donors personal information where necessary to fulfill the purposes identified at the time of collection.

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

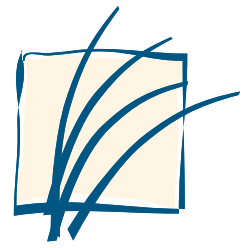
3.3 We will not sell clients and donors lists or personal information to other parties.

### *Policy 4 – Retaining Personal Information*

4.1 If we use clients and donors personal information to make a decision that directly affects the clients and donors, we will retain that personal information for at least one year so that the clients and donors has a reasonable opportunity to request access to it.

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## Personal Information Protection Policy (cont.)

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

5.2 Clients and 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 clients' and donors' correction request in the file.

### *Policy 6 – Securing Personal Information*

6.1 We are committed to ensuring the security of clients and donors personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.

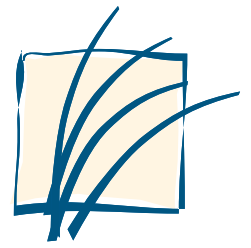
6.2 The following security measures will be followed to ensure that clients and donors personal information is appropriately protected: the use of locked filing cabinets; physically securing offices where personal information is held; the use of user IDs, passwords, encryption, firewalls; restricting 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.

6.3 We will use appropriate security measures when destroying clients and 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.

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## Personal Information Protection Policy (cont.)

### *Policy 7 – Providing Clients and Donors Access to Personal Information*

- 7.1 Clients and donors 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 clients and 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 clients and donors of the cost and request further direction from the clients and donors 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 clients and donors in writing, providing the reasons for refusal and the recourse available to the clients and donors.

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

- 8.1 The Privacy Officer is responsible for ensuring Kelowna Gospel Mission Society's compliance with this policy and the Personal Information Protection Act.
- 8.2 Clients and donors should direct any complaints, concerns or questions regarding Kelowna Gospel Mission Society's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the clients and donors may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Kelowna Gospel Mission Society's Privacy Officer:

Randy Benson, Executive Director  
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