

GVSCU Legacy Foundation - Privacy Policy

Part 1 – Introduction

1.1 In 2008, Greater Victoria Savings Credit Union, after many years of service in the Greater Victoria area, merged with Vancouver City Savings Credit Union. The GVSCU Legacy Foundation is an independent, endowed Foundation. It was incorporated in 2009 in commemoration of the Greater Victoria Savings Credit Union and its long history of charitable work in the Greater Victoria area. The funding for its endowment was provided by VanCity as part of the merger agreement. Its purpose is to provide grants to organizations engaged in non-profit endeavours in the area formerly served by the Greater Victoria Savings Credit Union in the Capital Regional District of British Columbia.

1.2 The GVSCU Legacy Foundation is committed to being accountable for how it treats the Personal Information it collects about individuals and for the principles outlined in this Policy.

1.3 This Policy has been developed in compliance with British Columbia's *Personal Information Protection Act* ("PIPA").

1.4 PIPA sets out rules for how organizations such as the GVSCU Legacy Foundation can collect, use and disclose Personal Information about individuals.

Part 2 – Personal Information

2.1 "Personal Information" means information about an identifiable individual, such as (but not limited to the following):

- (a) Name
- (b) Home address
- (c) Home telephone numbers
- (d) Home email address and facsimile numbers
- (e) Positions held within the organization applying for a Grant, and the dates of them
- (f) Positions held in other organizations, and the dates of them
- (g) Occupation or job title
- (h) When an organization conducts its financial affairs in whole or in part by using the bank account of one or more of its members instead of accounts in the name of the organization, then details of those bank accounts, including name of bank and branch, address and bank account numbers
- (i) When an organization conducts its financial affairs in whole or in part by using the bank account of a company, business or other organization instead of accounts in the name of the organization, then details of those bank accounts, including name of bank and branch, address and bank account numbers
- (j) Employer's name, postal address, email address and telephone numbers
- (k) Individual's business telephone and facsimile numbers
- (l) Individual's business address
- (m) Individual's business email address

2.2 "Other Information" is any information provided by an organization that may seek or is seeking a Grant which that organization has supplied in a Grant Application or in any other document provided to the GVSCU Legacy Foundation which is not Personal Information. "Other Information" is not subject to the provisions of PIPA.

Part 3 - Organizations to Which this Policy Applies

3.1 This Privacy Policy applies only to the GVSCU Legacy Foundation. It does not apply to Vancouver City Savings Credit Union.

Part 4 – Purpose of Collection and Use of Personal Information

4.1 The GVSCU Legacy Foundation collects Personal Information and Other Information about organizations which apply for Grants

- To verify identity
- To verify and/or use in investigation as to whether or not the requesting organization has made similar or duplicate funding requests of other granting agencies
- To verify and/or use in investigation as to whether or not an individual making a funding request on behalf of the organization has made similar or duplicate funding requests of other granting agencies
- To verify the charitable status of the requesting organization
- To verify that the requesting organization is in good standing with the Registrar of Companies
- To verify that the Board of Directors, address of the organization and other information provided are as reported to the Registrar of Companies in the annual report which most recently precedes the date of the Application for funding
- To verify that the information provided in an Application for funding is true

Part 5 – Collection, Use and Disclosure of Personal Information

5.1 The GVSCU Legacy Foundation only collects and uses Personal Information that is necessary to fulfill the purposes that the Foundation identifies in its Privacy Policy and in its General Policies.

5.2 The GVSCU Legacy Foundation does not collect, use or disclose Personal Information except for the purposes disclosed in its Privacy Policy and its General Policies, except as otherwise provided in this Privacy Policy.

5.3 The GVSCU Legacy Foundation may disclose any Personal Information and Other Information collected about organizations applying for funding and any individuals identified in any application to other organizations to which applications may be made for funding in order to coordinate funding, avoid duplication of funding, and to detect fraud or dishonest applications.

5.4 The GVSCU Legacy Foundation may disclose Personal Information and Other Information for purposes not specifically dealt with in its Privacy Policy or its General Policies without the knowledge or consent of the individual concerned in the following circumstances:

- (a) When required by a Court to do so, in order to comply with a Court Order, Subpoena or Warrant,
- (b) In cases of the investigation of a breach of an agreement made with the GVSCU Legacy Foundation, including a breach of any of the terms under which a Grant has been made,
- (c) In cases of a contravention or circumstances where there has been or it appears that a contravention may have occurred of a Federal or Provincial law when the Board of Directors considers it appropriate to do so,

- (d) In the case of an emergency where the life, health or security of an individual is or appears to be threatened,
- (e) As may otherwise be required or authorized by law.

5.5 The GVSCU Legacy Foundation will not seek consent from individuals identified in a Grant Application for the collection, use, disclosure or retention of their Personal Information. It is assumed that the individuals signing the Grant Application on behalf of the organization have obtained consent of all individuals named in the Grant Application.

5.6 The GVSCU Legacy Foundation will not sell or rent Personal Information or Other Information.

Part 6 – Withdrawal of Consent

6.1 An individual may withdraw consent to collection, use, disclosure or retention of Personal Information at any time, subject to legal or contractual restrictions and reasonable notice.

6.2 In general, the likely consequences of withdrawing consent may result in

- (a) Any Applications under consideration being treated as withdrawn, and
- (b) Cancellation of any Grant already approved, and a requirement that the organization immediately submit a Financial Statement and/or Audited Financial Statement and/or Statement Under Oath describing in detail to what use money already disbursed has been put, to be sworn by the person withdrawing consent, as well as a similar statement by one or more Officers of the organization.

Persons considering withdrawal of consent should contact the GVSCU Legacy Foundation for more information regarding the implications of withdrawing consent in the circumstances of their particular case.

6.3 If consent is withdrawn, the GVSCU Legacy Foundation will comply with this request, except as noted in this Privacy Policy. Individuals must be aware that implementation of their request may take a few months, and will not be granted if it blocks compliance with a situation under clause 5.4, or if they are under investigation for fraud or dishonesty of any type at the time of the request to withdraw consent.

6.4 Every withdrawal of consent to collection, use, disclosure or retention of Personal Information must be in writing and must be delivered to the GVSCU Legacy Foundation at its then-current email address or at its then-current postal address. Withdrawals of consent given orally or not to one of these addresses are not effective and no cognizance of them will be taken by the GVSCU Legacy Foundation.

Part 7 – Length of Retention

7.1 Personal Information, Contact Information and Other Information will be retained by the GVSCU Legacy Foundation for a minimum period of 8 years after January 1 of the year following the last disbursement of any funds to the organization, in order to satisfy any requirement of Governmental authorities for retention of information for taxation or audit purposes.

Part 8 – How Information is Kept Secure

8.1 The GVSCU Legacy Foundation keeps all Personal Information, Contact Information and Other Information in a database accessible only by members of the Board of Directors and/or in paper files kept locked and accessible only by members of the Board of Directors.

8.2 When information is destroyed,

- (a) In the case of information in a database, that information is deleted in accordance with generally accepted standards, and no copy is kept, and
- (b) In the case of information by paper files, the papers containing that information are destroyed, and no copy is kept.

Part 9 – Ensuring Information is Accurate and Providing Individuals With Access to it

9.1 The GVSCU Legacy Foundation makes reasonable attempts to ensure that the Personal Information, Contact Information and Other Information collected, used, disclosed or retained is accurate, but in doing so it is relying on the organization which supplied it to ensure all information submitted is accurate.

9.2 While the GVSCU Legacy Foundation may make efforts to verify the accuracy of Personal Information, Contact Information and Other Information submitted by organizations requesting funding, it is not obligated to do so. The GVSCU Legacy Foundation may, but is not required to, attempt to verify the accuracy of such information if requested and the request is reasonable given the circumstances under which verification is requested. The GVSCU Legacy Foundation may attempt to verify such information if in the opinion of a Member of the Board of Directors it is advisable or necessary to do so.

9.3 An individual has a right of access to any of that individual's Personal Information or Contact Information which is under the control of the GVSCU Legacy Foundation. Any individual may ask the GVSCU Legacy Foundation to give that individual a copy of the Personal Information or Contact Information about that individual that the GVSCU Legacy Foundation has. Requests must be in writing and must be delivered to the GVSCU Legacy Foundation at its then-current email address or at its then-current postal address. Requests made or not to one of these addresses are not effective and no cognizance of them will be taken by the GVSCU Legacy Foundation.

9.4 Any individual may ask the GVSCU Legacy Foundation to give that individual information about the ways in which that individual's Personal Information or Contact Information is or has been used , and the names of persons or organizations to which their Personal Information or Contact Information has been disclosed, unless prohibited by Court order or otherwise at law.

9.5 The GVSCU Legacy Foundation may require an individual requesting access under clause 9.3 or information under clause 9.4 to prove that individual's identity in any way that the GVSCU Legacy Foundation thinks reasonable before providing the access or information sought.

9.6 The GVSCU Legacy Foundation may charge a "minimal fee" for providing an individual with access to that individual's Personal Information or Contact Information, and before providing access or information under clause 9.3 or clause 9.4 the GVSCU Legacy Foundation may provide the individual with a written fee estimate, by email or postal mail, and may require the individual to pay all or part of that fee in advance before releasing the requested information.

9.7 Information requested by an individual under clause 9.3 or clause 9.4 will be provided within 30 business days of being requested unless the GVSCU Legacy Foundation gives written notice that more time is required to respond.

9.8 If the GVSCU Legacy Foundation is authorized or nrequired by a Court or under law, including PIPA , to deny access to certain Personal Information or Contact Information then the GVSCU Legacy Foundation will not give access or provide such information to the individual requesting it.

9.9 Any individual may ask the GVSCU Legacy Foundation to correct any errors or omissions in that individual's Personal Information or Contact Information.

9.10 If the GVSCU Legacy Foundation is satisfied that an individual's request for correction is reasonable, then the Personal Information or Contact Information will be corrected as soon as reasonably possible. "Reasonably possible" may mean a period of several months.

9.11 If information is corrected the GVSCU Legacy Foundation will send the corrected Personal Information or Contact Information to each organization it was disclosed to during the year before corrections were made.

9.12 If the GVSCU Legacy Foundation refuses an access request it will tell the individual applying, in writing (which will normally be by email) stating the reasons for the refusal and outlining further steps that are available to the applicant, including the right to ask the Information and Privacy Commissioner for British Columbia to review the decision.

Part 10 – How to Complain About Treatment of Personal Information or Contact Information

10.1 To contact the person in the GVSCU Legacy Foundation responsible for compliance with PIPA, an individual must send an email to the then-current email address of the GVSCU Legacy Foundation, addressed to "Information and Privacy".

10.2 Any individual not satisfied with the response of the GVSCU Legacy Foundation concerning a request for access to that individual's Personal Information or Contact Information may complain to the Information and Privacy Commissioner for British Columbia.

Part 11 – Policy Subject to Change

11.1 This Privacy Policy is subject to change by the board of Directors of the GVSCU Legacy Foundation at any time.

12.1 Any request or issue arising under this Privacy Policy will be dealt with under the Privacy Policy as it exists at the time the request is made or issue arises, and not under the Privacy Policy as it existed at the time any application for funding was made or any Personal Information was provided.