



## PRIVACY POLICY

*Approved July 9, 2016*

### Introduction

The Richmond Delta Youth Orchestra (RDYO) recognizes the value of its relationships with potential donors, donors, volunteers, employees, students and families and is committed to respecting and protecting their personal information. We value the trust of those we deal with, and of the public, and recognize that maintaining this trust requires transparency and accountability in our treatment of the personal information that is entrusted to us.

### Definition of Personal Information

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. Personal information, however, does not include publicly available information or employee personal information which is contact information or work product information as defined under the British Columbia Personal Information Protection Act ("PIPA").

## POLICY

### 1. Accountability

**An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles. Accountability for the RDYO's compliance with privacy legislation rests with the designated Privacy Officer, who is the President of**

**the Board of Directors. The name and contact information of the Privacy Officer will be made available to interested individuals through the RDYO website, its Privacy Statement or upon contacting the RDYO (see last page of this policy).**

1.1 We are responsible for personal information in our possession, including information that has been transferred to a third party for processing. In cases where such transfers take place we ensure that the third party has comparable privacy safeguards in place.

## 2. Identifying Purposes

**The purposes for which personal information is collected shall be identified by the RDYO when or before the information is collected.**

2.1 The purposes will be limited to those that are related to the RDYO's projects, programs, and activities and that a reasonable person would consider to be appropriate in the circumstances. We collect personal information concerning our donors, students, and families for the following reasons:

- to comply with CRA requirements for gift processing;
- to provide donors with information about how donated funds are used by RDYO;
- to keep donors informed about RDYO activities;
- to promote opportunities for donors and potential donors to support RDYO;
- to ensure the safety of students and families enrolled in our programs, by maintaining up to date contact information and personal details that are applicable to their participation in the program

During the course of its various projects, programs and activities, the RDYO may also collect personal information from Board members, other volunteers, and employees. The RDYO will specify the identified purposes, orally or in writing, to the individual from whom personal information is being collected either at the time of collection or after collection but prior to use or disclosure. We will state the identified purposes in such a manner that an individual can reasonably understand how the information will be used or disclosed.

## 3. Consent

**The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except where inappropriate.**

3.1 The manner in which RDYO obtains consent for the collection of personal information varies with the sensitivity of the information being collected. PIPA makes provision for express, implied or deemed consent, depending on the situation. Because of the nature of the information we collect, in most cases we will rely on implied consent at the time of collection.

The principle requires “knowledge and consent,” and RDYO will make a reasonable effort to ensure that individuals are aware of the purposes for which personal information is collected at or before the time of collection. Individuals can give consent:

- in writing, such as when completing an online donation form or signing a Deed of Gift;
- through an opt-out process, either by checking off a box on a response form or by contacting the RDYO directly; or
- orally, either in person or by telephone. Individuals may withdraw their consent at any time, by any means, with reasonable notice to the RDYO. However, consent cannot be withdrawn retroactively.

1.2 RDYO may collect, use, and disclose personal information without consent if that information is considered by law to be in the public domain. Sources of public information include telephone and professional directories, newspapers, periodicals and public registries.

#### 4. Limiting Collection

**The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.**

4.1 RDYO will not collect information indiscriminately. The types of information collected are limited to that which is necessary and reasonable to fulfill the purposes identified in 2.1. The RDYO will collect personal information by lawful means and will not intentionally mislead individuals about the purposes for which information is being collected.

Some of the types and means by which personal information is collected by RDYO include:

(a) Information collected automatically from RDYO Website:

- the Internet Protocol Address and domain name used. The Internet Protocol address is a numerical identifier assigned either to the donor’s Internet service provider or directly to the donor’s computer. This address can be translated to determine the domain name of the donor’s service provider (e.g. RDYO.ca)
- the type of browser and operating system;
- the date and time of the visit; and
- the web pages or services accessed.

(b) Information collected directly from an Individual: The RDYO will collect and record personal information provided to us by an individual through enrollment forms, correspondence, conversations, meetings, conferences, donations, or other forms of communication.

(c) Information collected from public sources.

These types and means by which personal information collected is collected by the RDYO are not intended to be an exhaustive list, and the RDYO may collect personal information about an individual from time to time by other means as is consistent with the purposes identified in 2.1.

## 5. Limiting Use, Disclosure, and Retention

**Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.**

5.1 When RDYO uses personal information for purposes other than those given at the time of collection, consent will be obtained for those specific purposes.

5.2 RDYO does not sell, rent, or trade mailing lists.

5.3 Personal information is disclosed only to third parties who have signed an agreement by which they agree to adhere to the terms of the RDYO's privacy policies.

5.4 RDYO will not disclose an individual's identity or personal information to third parties except in accordance with the terms of its privacy policies or unless required to do so as a part of an internal investigation or other law enforcement purpose, or as required by law.

5.5 Personal information will be retained as long as the purpose for which the information was originally collected remains valid.

## 6. Accuracy

**Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.**

6.1 RDYO will use its best efforts to ensure that information is used on an ongoing basis, including information that is disclosed to third parties, and information that is used to make a decision about an individual (such as a giving recognition category) is accurate, complete and up-to-date.

## 7. Safeguards

**Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.**

7.1 The RDYO is obligated to protect individuals' personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal. Security measures have been integrated into the day-to-day operating practices of the RDYO.

7.2 We will make our employees aware of the importance of maintaining the confidentiality of personal information, and we will exercise care in the disposal and destruction of personal information to prevent unauthorized parties from gaining access to it.

7.3 Our methods of protection will include physical measures (e.g. locked filing cabinets, restricted access to offices), organizational measures (e.g. security clearances and limiting access on a 'need-to-know' basis) and technological measures (e.g. the use of security passwords and encryption).

7.4 Third parties are expected to safeguard personal information entrusted to them in a manner consistent with the policies of RDYO, and are required to sign a confidentiality agreement as part of all contracts. Examples of third parties include mailing services and data analysis providers.

## 8. Openness

**An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.**

8.1 RDYO will be open about its privacy policies and procedures with respect to the management of personal information and will make them readily available in a form that is generally understandable.

8.2. The information made available will include:

- The name or title and contact information of the Privacy Officer who is accountable for compliance with RDYO's policies and procedures, and to whom complaints or inquiries can be forwarded;
- the means of gaining access to personal information held by RDYO;
- a general description of the types of personal information held by RDYO;
- a copy of any document that explains the RDYO's policies, procedures, standards or codes; and
- a general description of the types of personal information made available to third parties.

## 9. Individual Access

**Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.**

9.1 RDYO will respond to an individual's request within a reasonable length of time, but no longer than one month. While our response will typically be provided at no cost to the individual, depending on the nature and amount of information involved, we reserve the right to impose a reasonable fee to defray our cost.

9.2 The requested information will be made available in a form that is generally understandable. For example, where RDYO uses abbreviations or codes to record information, an explanation of those codes will be provided.

9.3 For the RDYO to provide an account of the existence, use and disclosure of personal information, an individual may be asked to provide additional information to aid in the search. The additional information provided will only be used for this purpose.

9.4 Upon request, RDYO will provide specific information about third parties to whom personal information has been disclosed unless prevented from doing so by the terms of any applicable confidentiality or non—disclosure agreements.

9.5 When an individual successfully demonstrates the inaccuracy or incompleteness of personal information in the possession or under the control of the RDYO, the RDYO will amend the information as required. Where appropriate, the amended information will be transmitted to third parties having access to the information in question.

9.6 Individuals may review the personal information the RDYO has recorded for that individual, and only that individual. An individual may also provide written permission to the RDYO to permit another individual to review the personal information the RDYO has recorded for that individual, but only for that individual.

## **10.Challenging Compliance**

**An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.**

10.1 The name of the RDYO's Privacy Officer will be known to staff. Information on how to contact the Privacy Officer will be identified to other individuals periodically and upon request.

10.2 The RDYO will maintain procedures to receive and respond to complaints or inquiries about its policies and practices relating to the handling of personal information. The complaint procedures will be easily accessible and user friendly.

10.3 Individuals who make inquiries or lodge complaints will be given information by RDYO of the existence of relevant complaint procedures.

10.4 If a complaint is found to be justified, the RDYO will take appropriate measures, including revision of the personal information, and, if necessary, amendment of RDYO's policies and practices.

### Policy Review

This policy will be reviewed every 3 years, or as required in order to ensure compliance with changes in law.

### How to Contact the Privacy Officer

Inquiries, complaints, or access requests should be addressed to: Privacy Officer, Richmond Delta Youth Orchestra, email: [President@RDYO.ca](mailto:President@RDYO.ca).

### Further Information

If you would like to obtain further information on privacy and your rights in regard to your personal information, visit the Legislation and Strategic Privacy Practices page on the BC Government's website at [http://www.cio.gov.bc.ca/cio/priv\\_leg/index.page](http://www.cio.gov.bc.ca/cio/priv_leg/index.page). contract employees adhere to this Code.

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