

# **Kereluk Road Recreation Society Privacy Policy<sup>1</sup>**

## **Privacy Commitment**

The Kereluk Road Recreation Society ("KRRS") is a member-funded society that owns and operates the property located adjacent to Kawkawa Lake, BC at Lot 5, District Lot 56, Yale Division, Yale District, Plan 10113, and the improvements thereto (collectively, the "Access"), for the use and benefit of its members, associate members, and their immediate family and guests for recreational and social purposes.

KRRS is committed to protecting your privacy, and supports a general policy of openness about how it collects, uses, and discloses your personal information. This Privacy Policy applies to the personal information of KRRS's members, guests, employees, contractors, and other individuals that is collected, used, or disclosed by KRRS.

This Privacy Policy also explains how you can contact KRRS if you wish to access your personal information, have a question about it, want to make a change to it, or want KRRS to delete any personal information that KRRS may be holding about you. KRRS strongly recommends that you take the time to read this Privacy Policy.

## **Personal Information**

For the purpose of this Privacy Policy, "personal information" means any information about an identifiable individual, but does not include:

- An individual's business contact information, including the individual's name, position name or title, business telephone number, business address, business e mail, and business fax number;
- Personal information about an individual that is publicly available information as designated under the Personal Information Protection Act, such as information available from a public registry or in a telephone book;
- Aggregated information that cannot be associated with a specific individual; and · Information about a company, association, or other organization.

## **What Personal Information We Collect**

KRRS collects the following personal information:

- Property ownership information in order to establish eligibility for membership or associate membership;
- The immediate family relationships of our members and associate members in order to determine their immediate family's eligibility to use the Access; · Contact information (name, home address, home e-mail address, and home and mobile telephone number)

in order to contact you with regard to your membership, associate membership, accounts, or status as the immediate family of a member or associate member or guest permitted on the Access; · Documentation relating to proof of age and identity in order to determine your qualification for membership, to work for us, status as a member of the immediate family of a member, or as a guest on the Access;

- Account balance and payment information;
- Personal information necessary to establish, manage and, if necessary, terminate, an employment, contractual, membership, associate membership, or status as the immediate family of a member or associate member or guest permitted on the Access relationship.

## **How We Use Personal Information**

KRRS collects personal information for the following purposes:

- To establish, manage and, if necessary, terminate employment, contractual, membership, associate membership, status as the immediate family of a member or associate member, or guest on the Access relationship;
- To enroll members and associate members and to provide services to them, including contact information for next of kin, information on immediate family and guests, and information relating to payment of accounts;
- To control access to, and the use of, the Access, and to track members, associate members, and their immediate family and guest's use of it; To meet legal and regulatory requirements;
- For other reasons as a reasonable person would consider appropriate in the circumstances.

KRRS may share personal information with third parties engaged to assist it in carrying out one or more of the purposes described above. These service providers are prohibited from using personal information for any purpose other than to provide this assistance and are required to protect personal information disclosed to them and to comply with the general privacy principles described in this Privacy Policy.

## **Consent**

KRRS, in most cases, relies on express consent. However, where the purpose of the collection of personal information is obvious, KRRS will rely on implied consent.

KRRS only collects the personal information necessary to manage the Access, or to establish, manage, or terminate an employment, contractual, membership, associate member, or status as the immediate family of a member or associate member or guest permitted on the Access relationship. KRRS requires individuals to consent to the collection, use, or disclosure of personal information as a condition of membership, associate membership, employment or contractual, or status as the immediate family of a member or associate member or guest permitted on the Access relationship, if such collection, use, or disclosure is required to fulfill the aforementioned purposes of collection.

KRRS reserves the right to collect, use or disclose personal information in certain limited circumstances, without the knowledge and consent of the individual, where required or permitted by law. Examples of this include:

- KRRS may collect or use personal information if it is clearly in the interest of the individual and consent cannot be obtained in a timely way, such as when the individual is seriously ill, mentally incapacitated, or in the case of an emergency where the life, health or security of an individual is threatened.
- KRRS may collect, use and disclose employee or contractor personal information without the consent of the individual where the collection, use, or disclosure is reasonable for the purposes of establishing, managing, or terminating an employment or contractual, status relationship between KRRS and the individual or entity.
- KRRS may collect or use personal information to create aggregate information, in order to identify members, associate members, and their immediate family and guests needs to aid in the development of new services and Access improvements.
- KRRS may disclose personal information without knowledge or consent to collect a debt, to comply with a subpoena, warrant, or other court order, or as may otherwise be required or authorized by law.
- KRRS may collect, use, or disclose personal information without the knowledge and consent of the individual if seeking consent of the individual is reasonably expected to compromise the availability or the accuracy of personal information reasonably required for an investigation or a proceeding, such as in the case of an investigation of a breach of agreement or contravention of federal or provincial law.
- KRRS may disclose your personal information to 3<sup>rd</sup> parties in order to collect debts owed to KRRS.

You may withdraw your consent to the use and disclosure of personal information, subject to legal, contractual or other restrictions and reasonable notice. KRRS will inform you of the implications of withdrawing consent. If you wish to withdraw your consent at any time, please contact our Privacy Officer (listed below).

### **Employee Personal Information**

Employee personal information is personal information that is reasonably necessary to establish, manage, or terminate an employment relationship with KRRS.

KRRS reserves the right to collect, use or disclose your employee personal information without your knowledge where it is required or allowed to do so by the Personal Information Protection Act.

### **Member and Associate Member Information**

Member and associate member personal information is personal information that is reasonably necessary to establish, manage, or terminate a membership or associate membership relationship.

KRRS reserves the right to collect, use or disclose your members or associate member personal information without your knowledge where it is required or allowed to do so by the Personal Information Protection Act.

KRRS also reserves the right to disclose to other members or associate members certain member or associate member personal information under the following circumstances:

- Where a member or associate member in good standing seeks election to an office within KRRS, or wants to advocate to the members for the change, rescission, or implementation of a KRRS rule, policy, or bylaw, or the investigation of some specific incident or matter, and makes a request in writing to the KRRS Board requesting the membership list, that person may be provided with the name, mailing address, and address of the property entitling a person to membership, of the all of the members in good standing (not the non-voting associate members).
- Where a member or associate member in good standing enquires of KRRS as to if a particular person is a member or associate member in good standing, KRRS may tell them if they are, and the address of the property entitling that person to membership or associate membership.
- Where the KRRS Board deems it desirable for the operation of the Society for all of the members and associate members in good standing to know who the other members and associate members in good standing are, and/or who their immediate family members and/or guests that are permitted on the Access are, it may provide a list to them of the names of such persons along with the address of the membership entitled property to which they are associated.

## **Your Access to Your Personal Information**

You have the right to access your personal information in the possession or control of KRRS and to know how that personal information has been or is being used, and to whom it has been disclosed.

Applications must be in writing and be sent to our Privacy Officer by either mail or email at the addresses set out below. Applications should have sufficient detail in order to allow us to identify you and the information that you are requesting.

You may ask to have errors or omissions in your personal information in our possession, or control, corrected. If we are satisfied that the correction is reasonably necessary, we will correct the information and notify anyone to whom we have provided the personal information in the 12 months previous to the correction. If we are not satisfied that the correction should be made, we will annotate the personal information under our control of the correction requested, but not made.

Requests for access and correction will usually be responded to within 30 calendar days of receiving the request, unless we apply to the Privacy Commissioner for an extension.

Our minimum charge for providing you with copies of your personal information is \$25, plus \$.25 per page for records reproduced in paper in black & white, \$1 per page for records reproduced in paper in colour, and; \$2 per DVD or CD for records reproduced in digital format. Moreover, in the event that the cost to KRRS' to collect your personal information exceeds our minimum charge, we may charge you the actual amount that it costs us to collect the information, plus 10% for administration. In each case, we will provide you with our estimated cost of collecting and reproducing your personal information before we do any work, and we may require you to pay us that amount in advance of any work being done.

There is no charge for correcting personal information and there is no charge for accessing or reproducing employee personal information.

KRRS reserves the right to refuse to comply with all or part of a request where we are required or permitted to refuse to do so by the provisions of the Personal Information Protection Act or other applicable legislation.

Where we refuse all or part of your request, we will give you the reasons for the refusal and the section of Personal Information Protection Act on which we base our refusal, the name and contact information of someone within KRRS who can explain the basis for the refusal, and of your right to apply to the BC Privacy Commissioner for a review pursuant to the provisions of the Personal Information Protection Act.

### **How We Protect Personal Information**

KRRS makes reasonable efforts to ensure that personal information relating to you is protected against loss and unauthorized access, collection, use, disclosure, copying, modifying, disposal, or similar risks. This protection applies in relation to information stored in both electronic and hard copy form, and will vary depending on the sensitivity of the information.

Access to personal information is restricted to selected individuals or third parties on a need-to-know basis. In addition, KRRS employs generally accepted information security techniques, such as firewalls and access control procedures in order to protect personal information against unauthorized access, collection, use, disclosure, copying, modifying, disposal, or similar risk.

### **Retention of Personal information**

KRRS retains personal information for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws. Personal information that is collected and used to make a decision about you is retained for at least 1 year. Your consent to such purpose(s) remains valid after termination of KRRS's relationship with you.

## **Changes to this Privacy Policy**

KRRS reserves the right to modify this Privacy Policy at any time without notice. The Privacy Policy distributed at any time, or from-time-to time posted via its website at: <https://drive.google.com/drive/folders/1MphV66IOKUez5T6DTP2BsHk4d5shKVJe?usp=sharing> shall be deemed the Privacy Policy then in effect.

## **Accountability**

KRRS is responsible for the Personal Information under its control, and we have designated a Privacy Officer who is responsible for our compliance with this Privacy Policy and with applicable laws. Other individuals within KRRS may be delegated to act on behalf of the Privacy Officer and KRRS shall use appropriate means to provide a comparable level of protection while information is being processed by a third party.

You may contact our Privacy Officer as follows:

<b>Kereluk Road Recreation Society</b>	
<b>Attention:</b>	Privacy Officer
<b>Address:</b>	66577 Kawkawa Lake Road, Hope, BC V0X 1L1  2
<b>Email:</b>	krrsinfo@gmail.com

## **Dispute Resolution**

Should you be unhappy about the collection, use, or disclosure of your personal information by KRRS, we ask that you discuss the matter further with our privacy officer. Should you not be satisfied with the response, you may make an application or complaint to the BC Privacy Commissioner at:

Office of the Information and Privacy Commissioner  
PO Box 9038 Stn Prov Govt  
Victoria, BC  
V8W 9A4  
Fax: 250-387-1696  
Telephone: 1-800-663-7867 and ask to be transferred to 250-387-5629 The

Information and Privacy Commissioner's website is found at [www.oipbc.org](http://www.oipbc.org).