

Privacy Policy

Revised: 2023 07

OBJECTIVE

The Society of Hope (the Society, Our, We) respects and upholds an individual's right to privacy, making every effort to protect personal information while in its possession. Our objective is to assure individuals associated in doing business with us that we are compliant with **BC's Personal Information and Privacy Act (PIPA)** and have safeguards in place to protect personal data.

This document sets out the Society's Policy with respect to the collection, use, disclosure and protection of personal information. It assists the Society in meeting their obligations under the *Residential Tenancy Act* and in continuing to foster and promote mutual respect. The Policy pertains to the Society's rental applicants, tenants, staff and volunteers.

DEFINITION OF PERSONAL INFORMATION

Personal information for the purposes of this Policy includes information that is identifiable to you as an individual. This may include but is not limited to; your legal name, date of birth, gender, phone number, address, banking information, income, references and/or emergency contacts. Personal information does not include publicly available information about you in your capacity as an employee of an organization such as your name, job title, work telephone number, etc.

OUR RESPONSIBILITIES

1. Introduction and Contacting the Society

The Society takes statutory responsibilities seriously and has measures in place to ensure the information collected is safe and secure. Society staff and volunteers are obligated to comply with this Policy, while safeguarding the personal information collected.

The Society has appointed a Privacy Officer who is responsible for the organization's compliance with this Policy. All inquiries, questions or concerns pertaining to this Privacy Policy or personal information should be directed to:

Privacy Officer
Society of HOPE
101 - 2055 Benvoulin Court
Kelowna, BC V1W 2C7

Office: 778-478-7977
Email: admin@societyofhope.org

2. Consent

The Society requires an individual's consent to collect, use and/or disclose personal information for the purposes of providing tenancy, employment, volunteer opportunities or assistance when necessary. Individuals who have provided the Society with a written request may receive a copy of their records or examine them on site by making an appointment with the Privacy Officer.

An individual has the right to refuse or withdraw consent at any time, subject to legal and contractual restrictions and/or obligations. However, refusal or withdrawal of consent may affect the Society's ability

to provide services. The Society's representative can explain options and/or possible consequences when requested and may record the outcome.

The Society will not collect, use, or disclose information beyond its intended purpose. However, extenuating instances may occur under which "consent" from an individual is not required, such as,

- In the event of an emergency,
- When disclosure is required by another statute or regulation,
- In response to a court order, warrant or subpoena,
- To aid in a bona fide law enforcement investigation,
- For next of kin in the event of death.

3. Accuracy

The Society makes every effort to ensure the accuracy of personal data is maintained while under its care, however the Society relies on individuals to provide changes and updates as they occur. **Any changes to contact information, to the number of occupants living in the unit, and any income-related changes that may affect rent contributions *must be disclosed to the Society.***

4. Purposes for Collection, Use & Disclosure

The Society collects and uses personal information for the purposes for which it was collected, such as,

- a) Effectively communicating in a timely and effective manner,
- b) Validating information contained in the rental application,
- c) Assessing any special requirements which may be necessary, for example,
 - ◇ modified housing,
 - ◇ eligibility for housing and/or housing subsidy,
- d) Contacting and evaluating references for rental housing, employment, or volunteer purposes,
- e) Processing rent or miscellaneous payments,
- f) Providing services which include, but are not limited to,
 - ◇ collection of rent and/or accounts in arrear,
 - ◇ costs related to repairs for damage caused by an individual,
 - ◇ repairs and maintenance when and where necessary,
 - ◇ occupancy verification with Canada Revenue Agency and Shelter Aid For Elderly Renters,
 - ◇ administration of payroll & group benefits,
- g) Producing and providing statistical information to potential funding organizations,
- h) Enabling the Society to verify the identity of those wishing to review their private information held by the Society,
- i) Reporting to governments, agencies or any party as legally required in Canada in accordance with current legislation.

When personal information is used for a purpose not previously identified, the new purpose will be identified prior to its use and the Society will seek new consent from the individual.

5. Disclosure of Information

The Society treats its obligations with respect to the use and disclosure of personal information very seriously. Applicants requesting subsidy must sign a BC Housing declaration, agreeing their personal information to be true, correct, and complete. BC Housing may audit shared information and/or obtain reports from various agencies to confirm and determine eligibility, including the appropriate rental rate based on the unit for which an applicant is being considered for.

Note that parties to legal proceedings have a right to obtain certain personal information by law. When required to do so, the Society's disclosures to third parties are done in accordance with the Privacy Act. The Society does not sell, trade or rent information to third parties.

6. Security Measures to Protect Personal Information

The Society has security measures in place to care for and protect personal information while under its care. The Society makes reasonable efforts to protect the data from loss or theft, unauthorized access, disclosure, copying, modification and/or its disposal.

Security safeguards include:

- a. Personal information is stored in our database on a secure server, and in hardcopy formats. Only authorized personnel have access to the information.
- b. Archived files are stored secured premises and monitored regularly for timely destructions.
- c. Technological measures such as passwords, limited access to files and the implementation of firewalls for computers accessing our Internet server.
- d. The Society does not collect any personal data about individuals browsing our website.

7. Retention

Personal information is retained for as long as is deemed necessary to satisfy its intended purposes, including business and legal obligations. After a reasonable time, the Society will remove/destroy personal data that can be associated with individuals.

8. Access to Records Request

Individuals have the right to access their personal information held by the Society. The Society's Privacy Officer will assist them in the process within 30 days of receiving a written request. The Society *may refuse* access to information, which is protected by legal, solicitor-client privileges or relates to an investigation. In addition, the Society *must refuse* to provide access to an individual's personal information if,

- It reveals the identity of another individual who provided information about someone else,
- It would threaten the well-being or safety of someone else.

If access cannot be provided, the Society will advise in writing.

9. Openness Concerning Policies and Practices

The Society will make available specific information about our policies and practices regarding the management of personal information.

10. Revisions to This Privacy Policy

The development of the Society's policies and practices for the protection of personal information is an ongoing process. Due to changes in technology and legal requirements we may revise this Policy from time to time. Please ensure that you refer to the current revision of the Society's Privacy Policy.

11. Concerns or Questions Regarding Compliance

An individual may address a concern or question about compliance with this Policy to the Society's Privacy Officer.

The Society will investigate any complaints received in writing. If a complaint is found to be justified, the Society will take appropriate measures to resolve the complaint including, if necessary, amending its policies and practices. An individual will be informed, in writing, of the outcomes of the investigation regarding his or her complaint.