



## Policy: Personal Information Protection

### Scope Of Personal Information Protection Policy:

This Personal Information Protection Policy (the “Policy”) sets out the principles which The Metro Vancouver Convention and Visitors Bureau, Tourism Vancouver (“Tourism Vancouver”) observes regarding the collection, use and disclosure of personal information about Tourism Vancouver’s employees, volunteers, interns and others employed or engaged to perform services for or on behalf of Tourism Vancouver.

Tourism Vancouver is governed by the requirements of the British Columbia *Personal Information Protection Act* (PIPA) and information is collected, used and/or disclosed in accordance with its provisions.

### DEFINITIONS

For the purposes of this Policy:

“**Business contact information**” means information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business e-mail or business fax number of the individual.

“**Collection**” - the act of gathering, acquiring, or obtaining personal information from any source, by any means.

“**Consent**” - involves voluntary agreement with what is being done or proposed. Consent may be express or implied.

“**Employee personal information**” - personal information about an individual that is collected, used or disclosed solely for the purposes reasonably required to establish, manage or terminate an employment relationship between the organization and that individual.

“**Employees**” - means any person employed or engaged by Tourism Vancouver to perform services for or on behalf of Tourism Vancouver, in any capacity, and includes volunteers, interns and independent contractors.

“**Express consent**” - signifies that an individual, knowing what personal information is being collected and for what purposes, voluntarily agrees to the information being collected, used and disclosed as notified. It may be given in writing or verbally.

“**Implied consent**” - exists when an individual is “deemed” to consent to collection, use or disclosure of personal information if the individual voluntarily provides it for a purpose that would, at the time, be considered obvious to a reasonable person.

“**Personal information**” means information about an identifiable individual and includes employee personal information but does not include

- (a) business contact information, or
- (b) work product information

Some examples of personal information include name, age, home address, personal telephone number, and medical information.

“**Work product information**” means information prepared or collected by an individual or group of individuals as part of the individual’s or group’s responsibilities or activities related to the individual’s or group’s employment or business.

### **PRINCIPLE 1 - TOURISM VANCOUVER’S ACCOUNTABILITY**

Tourism Vancouver is responsible for all personal information under its custody or control. The Tourism Vancouver Privacy Officer (the “Privacy Officer”) is accountable for Tourism Vancouver’s compliance with the principles described in this Policy and may be contacted at:

**The Privacy Officer**  
**Tourism Vancouver**  
**Suite 210-200 Burrard Street**  
**Vancouver, BC V6C 3L6**  
**Telephone: 604.682.2222**  
**E-mail: [privacyofficer@tourismvancouver.com](mailto:privacyofficer@tourismvancouver.com)**

Employees are also responsible for day-to-day compliance with this Policy. Employees who do not comply with this Policy may be subject to discipline, up to and including termination.

### **PRINCIPLE 2 - THE PURPOSES FOR COLLECTION**

Tourism Vancouver collects and uses information for purposes that are reasonable and necessary for business operations. For example, Tourism Vancouver may collect personal information for reasons that include the following:

- To recruit, select, hire, train and terminate employees
- To manage compensation, payroll and benefits administration of employees
- To deploy and manage employees
- To monitor the performance and development of employees
- To gather evidence for disciplinary action
- To determine the eligibility for transfer or promotion to other positions within Tourism Vancouver
- To meet regulatory requirements as required by law
- For health and safety administration purposes

### **PRINCIPLE 3 – CONSENT OR NOTICE**

Tourism Vancouver will collect, use or disclose personal information only with the individual’s knowledge and consent, except where otherwise required or permitted by PIPA. Tourism Vancouver will always collect personal information by fair and lawful methods.

Consent may be implied in some situations but Tourism Vancouver seeks to obtain express consent for the collection, use and sharing of sensitive information. Tourism Vancouver reserves the right to disclose information where required or authorized by law, for example, in the event of a serious medical emergency or to assist law enforcement.

An employee’s consent may be withdrawn at any time, on reasonable notice, subject to legal or contractual restrictions.

#### **PRINCIPLE 4 - LIMITING COLLECTION**

Tourism Vancouver limits the amount and type of personal information collected to that which is necessary for the purposes identified by Tourism Vancouver. Tourism Vancouver only collects personal information in compliance with PIPA.

#### **PRINCIPLE 5 - LIMITING USE, DISCLOSURE AND RETENTION**

Personal information will only be used or disclosed for the purposes for which it was collected, except with the individual's consent or as required or permitted by law.

Personal information is retained only as long as necessary for the fulfillment of the purposes for which it was collected or as otherwise required by law. Tourism Vancouver acknowledges that PIPA requires the retention of an individual's personal information for at least one year after using it to make a decision that directly affects the individual.

#### **PRINCIPLE 6 - ACCURACY**

Tourism Vancouver will make reasonable efforts to ensure that personal information is as accurate, complete, and up-to-date as required for the purposes for which it was collected. However, in some cases, Tourism Vancouver relies on individuals to ensure that certain information, such as changes to addresses and other contact information, is current, complete and accurate.

If an employee thinks that Tourism Vancouver has made a mistake, the individual can ask for corrections to be made to their personal information in Tourism Vancouver's custody or control by contacting the Privacy Officer.

From time to time Tourism Vancouver may contact individuals to ensure that the information collected is or remains accurate, complete and up-to-date.

#### **PRINCIPLE 7 - SAFEGUARDS**

Security safeguards are employed to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. The nature of the safeguards varies depending on the sensitivity of the personal information that has been collected; the amount, distribution, and format of the information; and the method of storage. More sensitive personal information is safeguarded at a higher level of protection.

The methods of protection employed by Tourism Vancouver include: (a) physical measures, including locked filing cabinets and restricted access to offices; (b) organizational measures, such as security clearances and limiting access on a "need to know" basis; and (c) technological measures, such as the use of passwords and encryption.

Tourism Vancouver uses care in the disposal or destruction of personal information in order to prevent unauthorized parties from gaining access to the information.

#### **PRINCIPLE 8 - OPENNESS**

Tourism Vancouver strives to be open about its policies and procedures with respect to the management of personal information. Any inquiries may be made to our Privacy Officer.

## **PRINCIPLE 9 - EMPLOYEE ACCESS**

Upon written request, Tourism Vancouver will provide individuals with access to their own personal Information in accordance with PIPA. Where permitted by PIPA, Tourism Vancouver may refuse to disclose to a person their own personal information, such as:

- where disclosure is prohibited by law;
- where the information contains personal information about a third party;
- where the information is of such a nature that its disclosure could reasonably be expected to prejudice the mental or physical health of an individual; or
- where the information is subject to solicitor-client or litigation privilege.

## **PRINCIPLE 10 - CHALLENGING COMPLIANCE**

An employee may direct a challenge concerning compliance with this Policy to the Privacy Officer. Tourism Vancouver has established procedures to receive and to respond to complaints or inquiries about Tourism Vancouver's policies and practices relating to the handling of personal information.

Tourism Vancouver will investigate all complaints. If Tourism Vancouver finds that a complaint is justified, Tourism Vancouver will take appropriate measures, including, if necessary, amending its policies and practices.

*This Policy contains the entire version and replaces any prior documentation.*

*This Policy may be updated from time to time.*