Resource Training Organization

Personal Information Protection Policy

At the Resource Training Organization (herein "RTO"), we are committed to providing our clients with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our clients, protecting their personal information is one of our highest priorities.

While we have always respected our clients' privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our clients of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting clients' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our clients' personal information and allowing our clients to request access to, and correction of, their personal information.

Scope of this Policy

This Personal Information Protection Policy applies to RTO. This policy also applies to any service providers collecting, using or disclosing personal information on behalf of RTO.

Definitions

Personal Information –means information about an identifiable *individual.* Personal information does not include contact information (described below).

Contact information – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.

Privacy Officer – means the individual designated responsibility for ensuring that RTO complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

1.1 Unless the purposes for collecting personal information are obvious and the client voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.

1.2 We will only collect client information that is necessary to fulfill the following purposes:

- To verify identity (i.e. to verify identity, we may collect name, home address, home telephone number and birth date);
- To deliver requested products and services (i.e. to deliver requested products and services, we may collect name, home address, home telephone number, education, and birth date);
- To enrol the client in a program (i.e. to enrol client in a program, we may collect name, home address, home telephone number, education, and birth date);
- To meet regulatory requirements (i.e. to meet regulatory requirements, we may collect name, home address, home telephone number, education, and birth date)

Policy 2 – Consent

2.1 We will obtain client consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).

2.2 Consent can be provided through the following methods: orally, in writing, electronically, or through an authorized representative or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the client voluntarily provides personal information for that purpose.

2.3 Consent may also be implied where a client is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs and the marketing of new services or products, and the client does not opt-out.

2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), clients can withhold or withdraw their consent for RTO to use their personal information in certain ways. A client's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the client in making the decision.

2.5 We may collect, use or disclose personal information without the client's knowledge or consent in the following limited circumstances:

- When the collection, use or disclosure of personal information is permitted or required by law;
- In an emergency that threatens an individual's life, health, or personal security;
- When the personal information is available from a public source (e.g., a telephone directory);
- When we require legal advice from a lawyer;
- To investigate an anticipated breach of an agreement or a contravention of law

Policy 3 – Using and Disclosing Personal Information

3.1 We will only use or disclose client personal information where necessary to fulfill the purposes identified at the time of collection or collection or for a purpose reasonably related to those purposes such as:

- To conduct client surveys in order to enhance the provision of our services;
- To contact our clients directly about products and services that may be of interest

3.2 We will not use or disclose client personal information for any additional purpose unless we obtain consent to do so.

3.3 We will not sell client lists or personal information to other parties, unless we have consent to do so.

Policy 4 – Retaining Personal Information

4.1 If we use client personal information to make a decision that directly affects the client, we will retain that personal information for at least one year so that the client has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, we will retain client personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

Policy 5 – Ensuring Accuracy of Personal Information

5.1 We will make reasonable efforts to ensure that client personal information is accurate and complete where it may be used to make a decision about the client or disclosed to another organization.

5.2 Clients may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.

5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the clients' correction request in the file.

Policy 6 – Securing Personal Information

6.1 We are committed to ensuring the security of client personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.

6.2 The following security measures will be followed to ensure that client personal information is appropriately protected: the use of locked filing cabinets; physically securing offices where personal information is held; the use of user IDs, passwords, encryption, firewalls; restricting employee access to personal information as appropriate (i.e., only those that need to know will have access; contractually requiring any service providers to provide comparable security measures).

6.3 We will use appropriate security measures when destroying client's personal information such as *shredding documents, deleting electronically stored information*.

6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Clients Access to Personal Information

7.1 Clients have a right to access their personal information, subject to the following limited exceptions:

- Solicitor-client privilege
- Personal information was collected or created by a mediator or arbitrator in the conduct of a mediation or arbitration for which he or she was appointed to act

  (i) under a collective agreement,

  (ii) under an enactment, or

  (iii) by a court.

- Disclosure would reveal personal information about another individual

7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.

7.3 Upon request, we will also tell clients how we use their personal information and to whom it has been disclosed if applicable.

7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.

7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the client of the cost and request further direction from the client on whether or not we should proceed with the request.

7.6 If a request is refused in full or in part, we will notify the client in writing, providing the reasons for refusal and the recourse available to the client.

Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual

8.1 The Privacy Officer is responsible for ensuring RTO's compliance with this policy and the *Personal Information Protection Act.*

8.2 Clients should direct any complaints, concerns or questions regarding RTO's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for RTO's Privacy Officer:

Doug MacLaren, CEO