



At Autism Society of British Columbia (AutismBC), we understand the personal nature of our work and we are committed to protecting our members and their personal information. Collecting personal information is an integral part of our organization as this information allows us to shape programs to meet the needs of our member-base as well as providing us with the ability to provide the best services possible to each member.

While we have always respected our member's privacy and safeguarded their personal information, we have strengthened our commitment to protect individual's personal information in alliance with British Columbia's Personal Information Protection Act (PIPA).

What is the Personal Information Protection Act?

PIPA is a Provincial Law SBC 2003 c. 38 whose purpose is to govern the collection, use and disclosure of personal information by organizations. The Act recognizes the right of individuals to protect their personal information, and the need of organizations to collect, use, or disclose personal information for purposes that a reasonable person would consider appropriate in the circumstances. PIPA is distinct from the federal law, the Personal Information Protection and Electronic Documents Act (PIPEDA), which does not apply to congregations within British Columbia.

What is the intent of the PIPA legislation?

The intent of the legislation is to prohibit the use of personal information for both commercial and noncommercial purposes. It is also intended that the legislation will provide a safeguard against identity theft. The federal legislation, PIPEDA, has a narrower standard that is limited to commercial activity, while the BC Provincial Act, PIPA, also relates to non-commercial activity including not-for-profits.

If there is a federal act, why do we not simply use that?

In provinces that have privacy legislation, the provincial legislation generally takes precedence over the federal legislation in cases in which the provincial legislation is seen to be "substantially similar" by the office of the Privacy Commissioner of Canada.



What is Personal Information?

Personal information is any factual or subjective information about an identifiable individual and includes:

- Home Address
- Mental/Physical Disability
- Home Phone Number
- Family Members Names
- Age
- Date of Birth
- Employee Files
- Personal email address
- Identification numbers: e.g. Social Insurance, Provincial Health, or Driver's License Numbers
- Race
- Evaluations
- Weight/Height
- Income
- Credit Card and/or Bank Records
- Religion
- Donation Information
- Sexual Orientation
- Loan or medical records, etc.
- Marital and/or social status
- Affiliations

What is not personal information?

Personal information does not include your business job title, business phone number, address or email address if you are an employee of AutismBC. Anything that can be found through publicly available information such as the phone book is not considered personal information.

How do we store personal information? Neon CRM Database

Neon CRM Security and Privacy: *"All data is encrypted during transmission using SSL (HTTPS), using some of the strongest encryption available. We encrypt sensitive data at rest following industry best practices, using either one-way or two-way hashing. We constantly review our infrastructure, both hardware and software, to ensure we are protected against vulnerabilities. Our development-centered approach allows us to protect our customers against the ever-changing landscape of threats."*



ACTUAL POLICY

Autism Society of British Columbia Privacy Policy

What personal information do we collect?

Policy 1—Limiting the Personal Information Collected

1.1 AutismBC will collect the following information:

- Home Address
- Mental/Physical Disability
- Home Phone Number
- Age
- Date of Birth
- Personal Email
- Address
- Donation Information
- Marital and/or Social Status
- Opinions
- Evaluations

For what purposes do we collect personal information?

Policy 2—Limiting the purposes of Personal Information

2.1 AutismBC will only collect information that is necessary to fulfill the following purposes:

- To verify identity
- To verify creditworthiness
- To identify member preferences
- To open and manage a membership account
- To process email subscriptions
- To provide services
- To enroll the member in a program
- To send out association membership information
- To contact our members for fundraising
- To meet regulatory requirements
- To collect and process payments



2.2 AutismBC will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection, unless the purposes for collecting personal information are obvious and the member voluntarily provides his or her personal information for the purpose stated.

Do we only collect personal information that we really need for our purposes?

Policy 3—Information is used for the purposes stated in Policy 2

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

- To conduct member surveys in order to enhance the provision of our services
- To contact our members directly about programs, services and/or products that may be of interest

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

3.3 We will not sell member lists or personal information to other parties.

How do we collect personal information and what do we tell individuals the purpose for collection is?

Policy 4—Personal information is secured and used for the stated purpose at time of collection.

4.1 AutismBC collects personal information using a secure database: Neon CRM.

4.2 AutismBC uses personal information to register individuals and families for programs and develop future programming.

4.3 Anonymous information is used to obtain grants and funding.

How do we obtain consent for collecting, using and disclosing personal information?

Policy 5—Obtaining Proper Consent



5.1 AutismBC will obtain consent to collect, use or disclose personal information (except where, as noted below, AutismBC is authorized to do so without consent).

5.2 Consent can be provided orally, in writing, electronically, 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 member voluntarily provides personal information for that purpose.

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

5.4 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), members can withhold or withdraw their consent for AutismBC to use their personal information in certain ways.

5.5 AutismBC may collect, use or disclose personal information without the member'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 AutismBC requires legal advice from a lawyer
- For the purposes of collecting a debt
- To protect ourselves from fraud
- To investigate an anticipated breach of an agreement or a contravention of law

How do we ensure that the personal information is correct, complete and current?

Policy 6—Ensuring Accuracy of Personal Information

6.1 We will make reasonable efforts to ensure that member personal information is accurate and complete where it may be used to decide about the member or disclosed to another organization.



6.2 Members may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information can be made in writing, orally or electronically, and must provide enough detail to identify the personal information and the correction being sought.

6.3 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. If the correction is not made, we will note the members' correction request in the file.

Where do we keep personal information and how is it secured?

Policy 7—Personal Information is Secured

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

7.2 The following security measures will be followed to ensure that personal information is appropriately protected: use of user IDs, passwords, restricting employee access to personal information as appropriate

7.3 AutismBC will use appropriate security measures when destroying member's personal information such as shredding documents and deleting electronically stored information.

7.4 AutismBC continually reviews and updates security policies and controls as technology changes to ensure ongoing personal information security.

Who, within our organization, has access to or uses the personal information, and for what purposes? Are we limiting access on a need-to-know basis?

Policy 8—Access to information is limited to a need-to-know basis

8.1 All AutismBC staff members have access to basic member information. Other information is limited to those who need it.

8.2 Administrators on Neon CRM have access to all AutismBC information collected on database.



Who is personal information disclosed to outside our organization and why? Should we be disclosing personal information to others for the purposes we disclose it?

Policy 9—Personal information is disclosed only when necessary

9.1 Personal information is disclosed only to those who need it for programming purposes.

9.2 Personal information is only disclosed is only disclosed to outside parties with voluntary consent.

How long do we retain the personal information? When is it disposed of and how? Is it disposed of securely?

Policy 10—Retention and disposal of personal information are appropriate to the uses stated for that information.

10.1 If AutismBC uses member personal information to decide that directly affects the member AutismBC will retain that personal information for at least one year so that the member has a reasonable opportunity to request access to it.

10.2 We will retain member personal information only if necessary, to fulfill the identified purposes or a legal or business purpose.

10.3 Disposal of personal information is secured through the shredding of physically documented information and the deletion of electronic information.

How do we respond to complaints or questions from individuals about our information practices?

Policy 11—Providing members access to personal information

11.1 A request to access one's own personal information must be made in writing and provide sufficient detail to identify the personal information being sought.

11.2 Upon request, AutismBC will disclose the use for personal information.

11.2 AutismBC 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.



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

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

Policy 12—Questions and Complaints: The Role of the Privacy Officer or designated individual

12.1 The Privacy Officer is responsible for ensuring AutismBC compliance with this policy and the Personal Information Protection Act.

12.2 Individuals should direct any complaints, concerns or questions regarding AutismBC compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the individual may also write to the Information and Privacy Commissioner of British Columbia.

For any questions or complaints please use the [contact us](#) form on our website.