



## POLICY

**TITLE:**

Privacy and Access to Information

**POLICY #:**

6.1

**WRITTEN BY:**

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**INITIALLY APPROVED:**

May 2, 2016

**REVISED BY:**

Peggy Lipinski

**REVISION APPROVED:**

June 10, 2017

**CATEGORY:**

Information Management

**NOTE:** The first appearance of a term in bold in the body of this Policy (or its Appendixes) means that the term is defined in the Definitions part of this Policy.

**PURPOSE:**

The purpose of this **Policy** is to provide a framework for how the **Society** collects, uses, discloses, and safeguards **Personal Information** entrusted to it by **Participants**.

**POLICY STATEMENT:**

- The Society recognizes the essential right of individuals to have their Personal Information administered so that it is protected on the one hand, and they have access to it on the other hand.
- The Society manages Personal Information in accordance with the *Personal Information Protection Act* (Alberta) and other applicable laws.
- As provided in *Policy 2.7 Role of the Secretary*, the **Secretary** is designated as the **Privacy Contact** unless the Board designates a different individual.

**APPLICABILITY:**

This Policy applies to all **Society Members** who have access to Personal Information and to all Participants.

**POLICY ELEMENTS:**

**1. Collection of Personal Information**

- 1.1 The Society will collect only the Personal Information required for interacting with Participants.

- 1.2 All Participants will be notified of the purpose(s) for which their Personal Information is collected. Participants are not provided with this notification if the Participant volunteers information for an obvious purpose (for example, producing a credit card to pay for a class or retreat, an event ticket or a book, when the information will be used only to process the payment).
- 1.3 Personal Information is normally collected directly from Participants. Personal Information may be collected from others with the Participant's consent, or as authorized or required by law.
- 1.4 Participants will be asked for consent to collect, use, or disclose their Personal Information, except where consent is authorized or required by law, or where they volunteer information for an obvious purpose.

## 2. Use and disclosure of Personal Information

- 2.1 Subject to sections 36 and 36.1 of the *Societies Act* (Alberta) regarding the **Register of Society Members** and *Policy 6.2 Inspection of Books, Accounts, and Records*, all Personal Information collected will be used and disclosed only for the purpose(s) for which it was collected.
- 2.2 Personal Information collected will not be disclosed to third parties except as required by law.

## 3. Security of Personal Information

- 3.1 The Society uses a **Contact Relationship Management (CRM)** software program, a financial software package, and other computer programs to collect and store personal information electronically. Access to these electronic records is password protected and restricted to those who require it to carry out Society business (for example, **Directors, Committee Members, and Office Volunteers** who are responsible for notifying individuals of upcoming events, schedule changes, and volunteer opportunities, or who are responsible for updating the CRM database and other electronic records).
- 3.2 Paper records, such as forms containing Personal Information, will be kept in a secure location accessible only to designated Office Volunteers.
- 3.3 Contact Information of **Donors** will only be accessible to those who require it to carry out the Society's business (for example, the **President, Vice-President, Treasurer, Secretary, Director(s)** charged with fundraising responsibilities, and Office Volunteers who are responsible for maintaining the Society's donations records and issuing tax receipts for donations).
- 3.4 Financial Information of Donors will only be accessible to those who require it to carry out the Society's business (for example, the Treasurer, Director(s) charged with

fundraising responsibilities, and Office Volunteers who are responsible for maintaining the Society's donations records and issuing tax receipts for donations).

3.5 Society Members specified in section 3 of this Policy will receive information about their obligation to protect Personal Information.

#### **4 Destruction of Personal Information**

4.1 Financial Information will be destroyed once it is not required to be kept for the purpose(s) it was collected, or for legal or business purposes.

4.2 The Society will use appropriate security measures when destroying Personal Information, including shredding paper records and permanently deleting personal identifying information in electronic records.

#### **5 Access to and updating Personal Information**

A written request from a Participant to access their Personal Information or to make a correction to it, or both, may be made and needs to provide sufficient detail to identify the Personal Information being sought. The request needs to be forwarded to the Privacy Contact, who will respond to the request within 45 calendar days.

#### **DEFINITIONS:**

“Board” (as defined in the Bylaws) means the Board of Directors of the Society.

“Committee” means a committee established by the Board as provided in Bylaw 3.8 (which includes a standing committee such as an Operations Committee and a temporary committee such as an Event Based Planning Committee).

“Committee Member” means an individual who is a member of a Committee.

“Contact Information” includes name, home address, mailing address, email address, and telephone number(s).

“Contact Relationship Management (CRM)” means a software program that enables the Society to easily store and find Contact Information.

“Director” (as defined in the Bylaws) includes both a Director holding the office of President, Vice-President, Secretary or Treasurer, and a Director holding the position of Director at Large.

“Directors” means the Directors who compose the Board as set out in Bylaw 3.1.

“Donor” means an individual who makes a donation to the Society, whether a dollar amount or a gift-in-kind.

“Financial Information” includes banking and credit card information for payments, and the dollar amount or nature of gift-in-kind donation made by Donors.

“Jewel Member” means a Society Member belonging to the Jewel category of membership as set out in *Policy 12.1 Membership Eligibility, Privileges, and Responsibilities*.

“Lotus Member” means a Society Member belonging to the Lotus category of membership as set out in *Policy 12.1 Membership Eligibility, Privileges, and Responsibilities*.

“Participant” means any individual who interacts with the Society, for example is a Society Member, Donor, or Volunteer; subscribes to the Society’s event notification email list; registers for courses or retreats; or purchases books or event tickets

“Personal Information” means information about an identifiable individual. It includes Contact Information, Financial Information, and date of birth.

“Policy” means a specific policy approved by the Board as provided in Bylaw 3.2 and *Policy 2.1 Policy Development*.

“President” means the individual occupying the office of President on the Board.

“Privacy Contact” means the individual designated by the Board as being responsible for ensuring that the Society complies with the *Personal Information Protection Act* (Alberta) (PIPA). Under *Policy 2.7 Role of the Secretary*, the Secretary is designated as the Privacy Contact unless the Board designates a different individual.

“Office Volunteer” means a volunteer designated by the Board to work in the Society Office.

“Register of Society Members” means the register of Society Members required to be kept by the Society further to section 36 of the *Societies Act* (Alberta).

“Secretary” means the individual occupying the office of Secretary on the Board.

“Society” (as defined in the Bylaws) means Gaden Samten Ling Tibetan Buddhist Meditation Society.

“Society Member” means an individual whose name appears in the Register of Society Members (includes Lotus Members, Jewel Members, and Vajra Members).

“Society Office” means the office of the Society located in the Alberta Centre for Peace and Meditation, 11403-101 Street, Edmonton, Alberta, T5G 2A9.

“Treasurer” means the individual occupying the office of Treasurer on the Board.

“Vajra Member” means a Society Member belonging to the Vajra category of membership as set out in *Policy 12.1 Membership Eligibility, Privileges, and Responsibilities*.

“Vice-President” means the individual occupying the office of Vice-President on the Board.

**REFERENCES:**

*Personal Information Protection Act (Alberta)*  
*Societies Act (Alberta)*, specifically sections 36 and 36.1

*Policy 2.7 Role of the Secretary*  
*Policy 6.2 Inspection of Books, Accounts, and Records*

**EFFECTIVE DATE OF INITIAL POLICY:** September 30, 2016

**EFFECTIVE DATE OF REVISED POLICY:** June 10, 2017

**NEXT REVIEW:** March 2018