

Whistler Blackcomb Foundation Privacy Policy

At the Whistler Blackcomb Foundation, we are committed to providing financial assistance to help other non-profits in our community by producing events, conducting different fundraising initiatives and executing programs. As providing this service involves the collection, use and disclosure of some personal information about our volunteers, donors, event sponsors, event suppliers including entertainment, event participants, and guests (together, the "**Participants**"), protecting their personal information is one of our highest priorities.

While we have always respected our Participants' privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information in accordance with British Columbia's *Personal Information Protection Act* (PIPA). PIPA 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 Participants 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 Privacy Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting Participants' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our Participants' personal information and allowing our Participants to request access to, and correction of, their personal information.

Scope of this Policy

This Privacy Policy applies to the Whistler Blackcomb Foundation. This policy also applies to any service providers collecting, using or disclosing personal information on behalf of the Whistler Blackcomb Foundation, including service providers in relation to the Whistler mental wellness project.

Definitions

Personal Information – means information about an identifiable individual, for example: name, age, home address, phone numbers, medical information, education, employment information. 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 Whistler Blackcomb Foundation complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the Participant 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 Participant information that is necessary to fulfill the following purposes:
 - To verify identity;
 - To identify Participant preferences;
 - To deliver requested products and services
 - To contact our Participants for fundraising and events;
 - To collect and process donations;
 - To understand the needs of our community at large in order to establish funding priorities;

Policy 2 – Consent

- 2.1 We will obtain Participant 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 orally, in writing or electronically or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the Participant voluntarily provides personal information for that purpose.

- 2.3 Consent may also be implied where a Participant 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 Participant 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), Participants can withhold or withdraw their consent for the Whistler Blackcomb Foundation to use their personal information in certain ways. A Participant'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 Participant in making the decision.
- 2.5 We may collect, use or disclose personal information without the Participant'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 business directory);
 - When we require 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

Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only use or disclose Participant personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as:
- To conduct Participant surveys in order to enhance the provision of our funding services;
- 3.2 We will not use or disclose Participant personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell Participant lists or personal information to other parties.

Policy 4 – Retaining Personal Information

- 4.1 If we use Participant personal information to make a decision that directly affects the Participant, we will retain that personal information for at least one year so that the Participant has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain Participant 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 Participant personal information is accurate and complete where it may be used to make a decision about the Participant or disclosed to another organization.
- 5.2 Participants 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. A request to correct personal information should be forwarded to the Privacy Officer.
- 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 participants' correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of Participant 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 Participant personal information is appropriately protected:
 - The use of a password-protected secure server/computer network.
 - The use of locked filing cabinets.
 - Physically securing offices where personal information is held.
 - Restricting employee access to personal information as appropriate (i.e., only those that need to know will have access.
 - Requiring any service providers to provide comparable security measures.
- 6.3 We will use appropriate security measures when destroying Participant personal information such as shredding documents and 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 Participants Access to Personal Information

- 7.1 Participants have a right to access their personal information, subject to limited exceptions.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Privacy Officer.
- 7.3 Upon request, we will also tell Participants 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 Participant of the cost and request further direction from the Participant 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 Participant in writing, providing the reasons for refusal and the recourse available to the Participant.

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

- 8.1 The Privacy Officer is responsible for ensuring the Whistler Blackcomb Foundation's compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Participants should direct any complaints, concerns or questions regarding the Whistler Blackcomb Foundation's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the Participant may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for the Whistler Blackcomb Foundation's Privacy Officer:

Mei Madden

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