



## Personal Information Protection Policy

At the Okanagan Innovation and Research Centre, hereafter referred to as ORIC, we are committed to providing our clients with exceptional service and meeting the needs of our employees, contractors and all members of the Board of Directors. As these commitments may involve the collection, use and disclosure of some personal information, protecting this information is one of our highest priorities.

ORIC protects personal information in accordance with British Columbia's *Personal Information Protection Act (PIPA)*. PIPA, which came into effect on January 1, 2004, and which sets out the ground rules for how B.C. businesses and not-for-profit organizations such as ORIC may collect, use and disclose personal information.

ORIC's privacy provisions are based on the Canadian Standards Association's *Model Code for the Protection of Personal Information*, recognized as a national standard in 1996. The Standard addresses the ways in which organizations collect, use and disclose personal information. It also addresses the rights of individuals to have access to their personal information and to have it corrected if necessary. The code's 10 principles are:

1. **Accountability:** An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.
2. **Identifying Purposes:** The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.
3. **Consent:** The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except when inappropriate.
4. **Limiting Collection:** The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.
5. **Limiting Use, Disclosure, and Retention:** Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by the law. Personal information shall be retained only as long as necessary for fulfilment of those purposes.
6. **Accuracy:** Personal information shall be as accurate, complete, and up-to-date as is



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necessary for the purposes for which it is to be used.

7. **Safeguards:** Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

8. **Openness:** An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

9. **Individual Access:** Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

10. **Challenging Compliance:** An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals for the organization's compliance.

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

ORIC's Personal Information Protection Policy, in compliance with PIPA and the CSA model code, outlines the principles and practices that ORIC will follow in protecting personal information. ORIC's privacy commitment includes ensuring the accuracy, confidentiality, and security of personal information provided to ORIC and allowing our clients and our employees to request access to, and correction of, their personal information.

### Definitions:

**Individual** – means an ORIC client, employee, contactor, or member of the Board of Directors

**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



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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 ORIC complies with this policy and PIPA.

### Policy 1 – Collecting Personal Information:

1.1 Unless the purposes for collecting personal information are obvious and the individual voluntarily provides personal information for those purposes, ORIC 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 personal information that is necessary to fulfill the following purposes:

- To verify identity;
- To identify client preferences;
- To understand the funding requirements needs of our clients;
- To deliver requested products and services;
- To ensure a high standard of service to our clients;
- To meet regulatory requirements;
- To assess client suitability for tenancy in the incubator;
- To collect and process rent and service payments;
- To provide training for ORIC clients and employees;
- To guarantee a travel or hotel reservation if employees are required to travel in the performance of their duties or for training purposes;
- To assist in the event of an emergency situation (i.e., medical or accident) on ORIC premises.

### Policy 2 – Consent:

2.1 ORIC will obtain consent to collect, use or disclose personal information except where, as noted below, ORIC is authorized to do so without consent.

2.2 Consent can be provided orally, in writing, or electronically through an authorized ORIC representative or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the personal



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information is voluntarily provided for that purpose.

- 2.3 Consent may also be implied where notice of use is given and a reasonable opportunity to opt-out of personal information being used for mail-outs, the marketing of new services, products or for fund raising is provided and the individual 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), consent can be withheld or withdrawn for ORIC to use personal information in certain ways. A request to withhold or withdraw consent for certain uses of personal information may restrict ORIC's ability to provide a particular service or product. If so, ORIC will explain the situation to assist the individual in making the decision.
- 2.5 ORIC may collect, use or disclose personal information without the individual'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 ORIC requires legal advice from a lawyer;
  - For the purposes of collecting a debt;
  - To protect ORIC from fraud;
  - To investigate an anticipated breach of an agreement or a contravention of law

### Policy 3 – Using and Disclosing Personal Information:

- 3.1 ORIC 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 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 ORIC will not use or disclose personal information for any additional purpose unless



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we obtain consent to do so.

3.3 ORIC will not sell client lists or personal information to other parties.

### **Policy 4 – Retaining Personal Information:**

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

4.2 Subject to policy 4.1, ORIC 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 ORIC will make reasonable efforts to ensure that personal information is accurate and complete where it may be used to make a decision or disclosed to another organization.

5.2 ORIC may be requested to correct 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 ORIC Privacy Officer.

5.3 If personal information is demonstrated to be inaccurate or incomplete, ORIC 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, ORIC will note the client's or employee's correction request in the file.

### **Policy 6 – Securing Personal Information:**

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

6.2 The following security measures will be followed to ensure that all personal information is appropriately protected by securing such information in locked filing



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cabinets; physically secure offices where personal information is held; the use of user IDs, passwords, encryption, firewalls; and restricting employee access to personal information as appropriate (i.e., only those that need to know will have access) and contractually requiring any service providers to provide comparable security measures.

6.3 ORIC will use appropriate security measures when destroying personal information such as shredding documents and deleting electronically stored information.

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

### **Policy 7 – Providing Access to Personal Information:**

7.1 Individual's have a right to access their personal information, subject to limited exceptions including: solicitor-client privilege, where disclosure would reveal personal information about another individual, health and safety concerns.

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 ORIC Privacy Officer.

7.3 Upon request, ORIC will also advise an individual as to how personal information is used and to whom it has been disclosed.

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

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

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

8.2 Any complaints, concerns or questions regarding ORIC's compliance are to be provided in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the



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concern, the client or employee may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for ORIC Privacy Officer:

Robert D. Bissell

Phone Number: 250-763-8126

Email Address: [privacy@oric.ca](mailto:privacy@oric.ca)

Mailing Address c/o ORIC

P.O. Box 728, Penticton, BC V2A 6J9