

CANADIAN MENTAL HEALTH ASSOCIATION SHUSWAP/REVELSTOKE BRANCH

PRIVACY POLICY

Overview

The Canadian Mental Health Association Shuswap/Revelstoke Branch (the “**Society**”) values your privacy and recognizes the need to provide security for your personal information.

This Privacy Policy sets out the Society’s policies regarding the collection, use and disclosure of your personal information, how you may access your personal information in our control and what steps you and we may take to ensure the accuracy of your personal information.

1. **What is personal information**

1.1. Your personal information is any information, whether in writing or any other form, about you as an identifiable individual. It includes information like your age, gender, information about your marital or family status, birth date, information about your income or the like.

1.2. Personal information does not include:

- (a) your name or information which would enable us to contact you at your place of employment including your name, position name or title, business telephone number, business address, business email and business fax number; or
- (b) personal information about you that is publicly available information such as information available from a public registry or contained in a telephone book.

2. **What personal information the Society may collect about you**

2.1. The Society may collect the following personal information:

- (a) personal information which you voluntarily provide to us on the website located at www.foxcrofthousing.ca (the “**Website**”);
- (b) personal information you provide on the application form (the “**Application Form**”) for Foxcroft Affordable Homeownership (“**Foxcroft**”); and
- (c) personal information from third party sources, such as the Canada Revenue Agency, used to verify the information provided on the Application Form.

3. **Why the Society may collect or use your personal information**

3.1. The Society only collects as much personal information as is reasonably necessary for the stated purposes.

- 3.2. Except where the Society is permitted or required by law to collect or use personal information without your knowledge and consent, the Society will do so fairly and openly and with your knowledge and consent.
- 3.3. We do not sell or trade your personal information.
- 3.4. We collect and use your personal information:
- (a) if you are an applicant, to assess your eligibility to enter the random selection to purchase a strata lot in Foxcroft;
 - (b) if you are an occupant, to assess the eligibility of the applicant(s) to enter the random selection to purchase a strata lot in Foxcroft;
 - (c) to verify the information you provide to the Society to support the eligibility of an applicant for housing;
 - (d) to respond to enquiries you make about the Application Form or Foxcroft, whether through the Website or otherwise;
 - (e) to provide you with information about Foxcroft;
 - (f) to address your concerns and feedback addressed to the Society's Privacy Officer (see below for contact information); and
 - (g) such other purposes as we may advise at or before collection or use.
- 3.5. Your consent to the use of your personal information for such purposes remains valid even if an applicant is not eligible or is eligible but is not randomly selected to purchase a strata lot in Foxcroft.

Why the Society may disclose your personal information

- 3.6. The Society may disclose your personal information to the British Columbia Housing Management Commission ("**BC Housing**") to allow BC Housing to conduct audits of applications to confirm an applicant's eligibility to enter the random selection to purchase a strata lot in Foxcroft. BC Housing is prohibited from using personal information for any purpose other than as set out in this section 3.6 and is required to protect personal information disclosed to them by us and to comply with the general privacy principles described in this Privacy Policy.
- 3.7. The Society may disclose your personal information to fulfill any of the purposes set out above in section 3.4.

4. Knowledge and consent

- 4.1. Except where required or permitted to do so without your consent, the Society only collects your personal information with your knowledge and consent.

- 4.2. In most cases, the Society will rely on your express consent (for example where you acknowledge or consent in writing to the collection, use or disclosure of certain personal information).
- 4.3. Where the collection of personal information is obvious on its face, the Society may rely on your implied consent (for example, when you fill out the required information on the Application Form, you are consenting to the use of that personal information for the purpose of assessing the eligibility of an applicant to purchase a strata lot in Foxcroft, including informing the applicant of his or her eligibility).
- 4.4. The Society may obtain your consent orally or in writing.
- 4.5. Except where the Society may do so without your knowledge and consent, the Society will identify the purposes of collection, use or disclosure at or before the collection, use or disclosure.
- 4.6. The Society will not use your personal information for purposes other than those set out above in section 3.4 without first advising you and obtaining your consent, except where it may do so without your knowledge or consent.
- 4.7. The Society reserves the right to collect, use or disclose personal information in certain limited circumstances without your knowledge and consent, where required or permitted by law. Examples of this include:
 - (a) where it is clearly in your interests and your consent cannot be obtained in a timely way;
 - (b) in order to create aggregate information in order to identify the needs of applicants for Foxcroft and trends, and to aid in the development of new affordable home ownership programs;
 - (c) where it is reasonable to expect that disclosure with your consent would compromise an investigation or proceeding;
 - (d) where disclosure is for the purpose of complying with a subpoena, warrant or order issued or made by a court; and
 - (e) where disclosure is required or authorized by law.
- 4.8. You may withdraw your consent at any time, and the Society will stop collecting, using or disclosing the personal information for which you have withdrawn your consent, unless the Society is allowed to collect use or disclose the personal information without your knowledge or consent or where doing so would violate a contractual commitment. The Society will inform you of the implications of withdrawing your consent. If you wish to withdraw your consent at any time, please contact the Society's Privacy Officer (see below for contact information).

5. **Updating your personal information.**

- 5.1. The Society does not update your personal information unless it is necessary for an ongoing relationship with respect to Foxcroft (for example, if an applicant is selected to purchase a strata lot in Foxcroft).
- 5.2. Where it is necessary to keep your personal information current, the Society asks that you ensure that the personal information which it has about you is accurate and up to date.
- 5.3. If you wish to update your personal information, you may do so by directing a notice about the changed information to the Privacy Officer at the address or email set out below.

6. **How we protect personal information**

- 6.1. The Society makes reasonable efforts to ensure that personal information relating to you is protected against loss and unauthorized access, collection, use, disclosure, copying, modifying, disposal or similar risks. This protection applies in relation to personal information stored in both electronic and hard copy form and will vary depending on the sensitivity of the information.
- 6.2. Access to non-public personal information is restricted to selected employees or representatives of the Society on a need-to-know basis.
- 6.3. In addition, the Society employs generally accepted information security techniques, such as firewalls and access control procedures in order to protect personal information against unauthorized access, collection, use, disclosure, copying, modifying, disposal or similar risk.

7. **Retention of personal information**

- 7.1. The Society retains personal information only as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws. Personal information which is collected and used to make a decision about an applicant is retained for the following amount of time:
 - (a) if an applicant is not eligible to enter the random selection to purchase a strata lot in Foxcroft, personal information about the applicant and other occupants, including the Application Form, will be retained for one year;
 - (b) if an applicant is eligible to enter the random selection but is not selected to purchase a strata lot in Foxcroft, personal information about the applicant and other occupants, including the Application Form, will be retained for:
 - (i) one year, with respect to the Application Form; and
 - (ii) for as long as the applicant wishes to remain on the waiting list to purchase a strata lot in Foxcroft, with respect to the contact information of

the applicant (for example, the applicant's name, telephone number and email address);

- (c) if the applicant is eligible to enter the random selection and is selected to purchase a strata lot in Foxcroft, personal information about the applicant and other occupants, including the Application Form, will be retained for as long as the applicant owns a strata lot in Foxcroft, or for the other occupants, for as long as an occupant resides in the strata lot.

8. **Access to personal information in our control**

- 8.1. You have the right to access your personal information in the possession or control of the Society, to know how that personal information has been and is being used, and to whom it has been disclosed. The Society reserves the right to refuse to comply with all or part of a request where we are required or are permitted to refuse to do so by the provisions of applicable legislation.
- 8.2. Applications must be in writing and be sent to our Privacy Officer either by mail or email at the addresses set out below. Applications should have sufficient detail that allows us to identify you and the personal information you are requesting.
- 8.3. The Society reserves the right to make an appropriate charge for retrieval costs. In such case, the Society will provide you with a quote for accessing and copying your personal information in advance and may require a deposit before assembling your personal information in our control.

9. **Correcting Errors**

- 9.1. It is important for both you and us that your personal information that we have collected and may use is accurate and up to date.
- 9.2. Where it is a matter of simply correcting inaccurate personal information, the Society will do so upon being advised of the error.
- 9.3. If there is any dispute about whether information is accurate (for example where it is subjective information) if the Society disagrees, it will not change the personal information but will make a notation about the disagreement.
- 9.4. There is no charge for correcting personal information.

10. **When may I be denied access to my personal information**

- 10.1. In general, the Society may deny access to personal information when:
 - (a) the information is protected by solicitor-client privilege;
 - (b) the disclosure of the information would reveal confidential commercial information that if disclosed could harm the Society's competitive position;

- (c) the information was collected as part of an investigation and the investigation and associated proceedings have not been completed;
 - (d) disclosure of the information could threaten the safety or physical or mental health of a third party;
 - (e) disclosure would reveal personal information about another individual; and
 - (f) disclosure would reveal the identity of an individual who has provided personal information about you and that third party has not consented to the disclosure of his or her identity.
- 10.2. Where the Society is permitted or required to deny access to certain information, but that information can be redacted, the Society will attempt to do so and provide you access to the unredacted personal information.
- 10.3. Where the Society denies you access to your personal information or declines to correct your personal information, the Society will advise you of the reason.

11. **Assistance to you**

- 11.1. The Society strives to be as open as possible about its policies and practices relating to the management of personal information.
- 11.2. The Society will assist you with your request where reasonably possible.
- 11.3. Where you have questions they should be directed to the Society's Privacy Officer as set out below.

12. **Privacy Officer at the Society**

- 12.1. The Society has a Privacy Officer who is responsible for the Society's compliance with this policy and with applicable privacy legislation. Other individuals within the Society may be delegated to act on behalf of the Privacy Officer and the Society will use appropriate means to provide a comparable level of protection while information is being processed by a third party.
- 12.2. Where there is a conflict between this Privacy Policy and applicable privacy legislation, the privacy legislation applies.
- 12.3. The address of the Society's Privacy Officer is:

Canadian Mental Health Association Shuswap/Revelstoke Branch Privacy Officer
 433 Hudson Avenue NW,
 P.O. Box 3275,
 Salmon Arm, B.C. V1E 4S1

Tel: (250) 832-8477
 Fax: (250) 832-8410
 Email: ●

13. **The Society works to resolve issues**

Where you have an issue with the collection, use or disclosure which the Society has made of your personal information, or where you have an issue with this Privacy Policy, please contact the Society's Privacy Officer.

- 13.1. If after doing so you remain dissatisfied, you may wish to consider the applicable privacy legislation or contact the privacy commissioner responsible for personal information legislation in British Columbia. The contact information is as follows:

Legislation: Personal Information Protection Act (B.C.)

Office of the Information and Privacy Commissioner of British Columbia
 PO Box 9038, STN Prov. Govt.
 Victoria, B.C. B8W 9A4

Tel: (250) 387-5629
 Fax: (250) 387-1696
 Email: info@oipc.bc.ca
 Web Site: www.oipc.bc.ca

13. **Changes to this privacy policy**

- 13.2. The Society reserves the right to change this Privacy Policy at any time. Accordingly in each situation where you provide us with your personal information, you should check the then current Privacy Policy of the Society.

Website Policy

By using the Website, you signify your agreement with and acceptance of the Society's Website Privacy Policy. If you do not accept this Website Privacy Policy, you must not access or use the Website.

The Society may, at any time, without notice or liability, revise this Website Privacy Policy by updating this posting. You should periodically revisit this posting to review any revisions to this Website Privacy Policy. If any revision is not acceptable to you, you must cease accessing and using the Website. If you continue to access or use the Website after any revisions are posted you will be deemed to have accepted those revisions.

While the Society takes reasonably appropriate measures to safeguard personal information that you may provide online, you should be aware that information which you provide online and any email communications between you and the Society may not be secure. The Society suggests encrypting all emails in order to increase the security of your communications with the Society.

The Society, its affiliates, employees and representatives cannot be liable to you or any other party for any damages of any kind, including without limitation, indirect, special consequential or incidental damages, or any other damages directly or indirectly arising from your use of the Website or its content.

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