

Updated: October 29, 2012

Version 2.0 This Document is Subject to Future Updates

**Personal Information Protection
Private Sector Privacy Legislation
Personal Information Protection Policy**

This form has been designed to meet the needs of a diverse range of organizations. To make the form reflect the operations of your particular organizations, fill in the appropriate information in all areas highlighted in yellow.

**Strata LMS3942 - The Lions
Personal Information Protection Policy**

At The Lions, we are committed to providing our owners, residents, and visitors with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our owners, residents, and visitors, protecting their personal information is one of our highest priorities.

While we have always respected our owners', residents', and visitors' privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information. http://www.bclaws.ca/EPLibraries/bclaws_new/document/ID/freeside/00_03063_01

We will inform our owners, residents, and visitors 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 Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting owners', residents', and visitors' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our owners', residents', and visitors' personal information and allowing our owners, residents, and visitors to request access to, and correction of, their personal information.

Definitions

Personal Information – means information about an identifiable individual including name, home address, phone numbers, bank account numbers, vehicle licence plate numbers, parking stall numbers, storage locker number, identification numbers such as drivers licence, photos and videos. 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 The Lions complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the owner, resident or visitor 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 owner, resident or visitor information that is necessary to fulfill the following purposes:
 - To verify identity;
 - To deliver requested products and services;
 - To facilitate bookings for common amenities [media room, guest suites, board rooms, etc.];
 - To ensure a high standard of service to our owners, residents, and visitors;
 - To meet regulatory requirements.

Policy 2 – Consent

- 2.1 We will obtain owner, resident or visitor 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, 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 owner, resident or visitor voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where an owner, resident or visitor is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs and the owner, resident or visitor 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), owners, residents, and visitors can withhold or withdraw their consent for The Lions to use their personal information in certain ways. An owner's, resident's or visitor'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 owner, resident or visitor in making the decision.
- 2.5 We may collect, use or disclose personal information without the owner's, resident's or visitor'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 we require legal advice from a lawyer;
 - For the purposes of collecting or paying a debt owed to The Lions;
 - To protect ourselves from fraud;
 - To investigate an anticipated breach of an agreement [such as bylaws and rules] or a contravention of law;
 - When the collection, use or disclosure is clearly in the interests of the individual and consent cannot be obtained in a timely way;
 - When it is reasonable to expect that the collection, use or disclosure with the consent of the individual would compromise the availability or the accuracy of the personal information and the collection is reasonable for an investigation or a proceeding;
 - When the personal information is collected by observation at a performance, a sports meet or a similar event at which the individual voluntarily appears, and that is open to the public;
 - The Lions may collect personal information from or on behalf of another organization without consent of the individual to whom the information relates, if the individual previously consented to the collection of the personal information by the other organization, and the personal information is disclosed to or collected by The Lions solely for the purposes for which the information was previously collected, and to assist The Lions to carry out work on behalf of the other organization.

Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only use or disclose owner, resident or visitor 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 correspond or conduct owner, resident or visitor surveys pertaining to Lions operation or common concerns.]
- 3.2 We will not use or disclose owner, resident or visitor personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell owner, resident or visitor lists or personal information to other parties unless we have consent to do so.

Policy 4 – Retaining Personal Information

- 4.1 If we use owner, resident or visitor personal information to make a decision that directly affects the owner, resident or visitor, we will retain that personal information for at least one year so that the owner, resident or visitor has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain owner, resident or visitor personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.
- 4.3 Summary of Retention Times for Documents Identified as possibly containing personal information:

Document Type	Regular Retention Time	If Used to Make a Decision	If Part of a Lawsuit or PIPA Request.
Administrative Documents			
Form K	3 months after move-out	1 year	2 years after resolution
Owners List	3 months	1 year	2 years after resolution
Concierge/Security Guard Documents			
Internal Memos	3 months after move-out	1 years	2 years after resolution
Concierge Logs	2 years	2 years	2 years after resolution
Incident Reports	2 years	2 years	2 years after resolution
Amenity Bookings	6 months	1 year	2 years after resolution
Various Booking Forms	6 months	1 year	2 years after resolution
Deposit Cheques on File	Until move-out	1 years	2 years after resolution
Parcel Log	3 months	1 year	2 years after resolution
Noise Incident Report	Permanent File	Permanent File	Permanent File
Strata Council Documents			
Building Manager's Reports	Permanent File	Permanent File	Permanent File
Meeting Agendas	1 year	1 year	2 years after resolution
Handwritten Notes / e-Note	3 months	1 year	2 years after resolution
Meeting Minutes	Permanent File	Permanent File	Permanent File
e-mails	1 year	1 year	2 years after resolution

Policy 5 – Ensuring Accuracy of Personal Information

- 5.1 We will make reasonable efforts to ensure that owner, resident or visitor personal information is accurate and complete where it may be used to make a decision about the owner, resident or visitor or disclosed to another organization.
- 5.2 Owners, residents, and visitors 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 via the Property Management Company].

- 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 owners', residents', and visitors' correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of owner, resident or visitor 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 owner, resident or visitor personal information is appropriately protected:

- firewalls and login IDs for electronic data;
- physically securing offices where personal information is held;
- restricting employee access to personal information as appropriate;
- ensuring that employees, volunteers and vendors are familiar with The Lions privacy policy and making them aware that they are bound by it.

- 6.3 We will use appropriate security measures when destroying owner's, resident's or visitor's personal information such as

- deleting electronically stored information;
- reformatting of electronic storage when taking it out of service;
- shredding documents.

- 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 Owners, residents, and visitors Access to Personal Information

7.1 Owners, residents, and visitors have a right to access their personal information, subject to limited exceptions.

- the information is protected by solicitor-client privilege;
- the information was collected or disclosed without consent, as allowed under section 12 or 18 of the Personal Information Protection Act, for the purposes of an investigation and the investigation and associated proceedings and appeals have not been completed;
- the information was collected or created by a mediator or arbitrator in the conduct of a mediation or arbitration for which he or she was appointed to act under a collective agreement, under an enactment, or by a court;
- the information is in a document that is subject to a solicitor's lien;
- the disclosure could reasonably be expected to threaten the safety or physical or mental health of an individual other than the individual who made the request;
- the disclosure can reasonably be expected to cause immediate or grave harm to the safety or to the physical or mental health of the individual who made the request;
- the disclosure would reveal personal information about another individual;
- the disclosure would reveal the identity of an individual who has provided personal information about another individual and the individual providing the personal information does not consent to disclosure of his or her identity.

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 correct personal information should be forwarded to the Privacy Officer via the Property Management Company].

7.3 Upon request, we will also tell owners, residents, and visitors 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 fee amounting to actual costs will be charged for providing access to personal information. We will inform the owner, resident or visitor of the cost and request further direction from the owner, resident or visitor on whether or not we should proceed with the request. A 50% deposit will be required at that time.

As of August 16, 2012, the fees charged by The Lions are as follows:

- **Time spent by Lions staff or volunteers: \$0.40 per minute**
- **Cost per sheet of paper produced: \$0.25**
- **Actual postage charges will vary based on the weight of the resulting package**

7.6 If a request is refused in full or in part, we will notify the owner, resident or visitor in writing, providing the reasons for refusal and the recourse available to the owner, resident or visitor.

7.7 Requests will be fulfilled on paper. In addition to the security concerns with transmitting data, electronic

requests require more time than paper requests, as the documents must first be censored electronically to remove the personal information of third parties and are then printed to ensure the electronic censorship cannot be undone. To convert these papers back to an electronic format would require additional time to scan and format. Therefore electronic copies would be more expensive to produce than paper copies.

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

- 8.1 The Privacy Officer is responsible for ensuring The Lions' compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Owners, residents, and visitors should direct any complaints, concerns or questions regarding The Lions' compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the owner, resident or visitor may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for The Lions' Privacy Officer:

The Lions Privacy Officer
c/o Southview Property Management
110-7580 River Road
Richmond, BC V6X 1X6
southview@telus.net
T. 604 270 8811
F. 604 270 0881

List of Updates:

Version	Date	Change
2.0	October 29, 2012	Added 4.3 and 7.7. Updated fees in 7.5.