



POLICY AND PROCEDURES

S 025: Privacy and Confidential Information

DEFINITION

This policy defines how Cycling BC collects, uses, retains, safeguards, discloses, and disposes of information, including the personal information of prospective and current participants and the public.

POLICY

Personal Information: Cycling BC will adopt and adhere to the guiding principles set out in the Federal *Personal Information Protection and Electronic Documents Act* (PIPEDA) as it relates to the following provisions: Accountability; Identifying Purposes; Consent; Limiting Collection; Limiting Use, Disclosure, and Retention; Accuracy; Safeguards; Openness; Individual Access; and Challenging Compliance.

PROCEDURE

- **Accountability:** Cycling BC acknowledges that it is responsible for personal information under its control and has designated its Chief Executive Officer (CEO) as the person who shall remain accountable for Cycling BC's compliance with this policy. Other individuals within Cycling BC may be responsible for the day-to-day collection and processing of personal information, and other individuals within Cycling BC may be delegated to act on behalf of the CEO regarding protecting personal information.
- **Identifying Purpose:** Cycling BC will document the purpose(s) for which personal information is collected at or before the time of collection. Cycling BC will collect only the information necessary for the purpose(s) identified. When Cycling BC wishes to use personal information that has already been collected for a purpose not previously identified, the new purpose will be identified before use.
- **Consent:** Cycling BC will, in the normal course of its business, obtain an individual's consent before using that individual's information for any purpose other than that for which it was collected. However, Cycling BC acknowledges that legal, medical, or security reasons may make it impossible or impractical to seek such consent. Cycling BC also acknowledges that seeking consent may be impossible or inappropriate when the individual is a minor, seriously ill, or mentally incapacitated. Cycling BC shall make a reasonable effort to ensure that an individual is advised of the purposes for which the information will be used.
 - NOTE: Cycling BC will disclose personal information when compelled by a competent legal authority but shall inform the affected individual as soon as practicable of the amount and type of information disclosed and the authority to which it was disclosed.
- **Limiting Collection:** Cycling BC shall not collect personal information indiscriminately. The



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amount and type of information collected shall be limited to what is necessary to fulfill the purpose(s) identified.

- **Limiting Use, Disclosure, and Retention:** Cycling BC shall limit how it uses, discloses and retains personal information. Cycling BC shall not use or disclose personal information unless and until it has 1) identified the purpose(s) and 2) received consent. Cycling BC will retain personal information only for as long as is necessary to fulfill its purposes unless required by competent legal jurisdiction.
- **Accuracy:** Cycling BC will attempt to ensure that the personal information it collects is accurate, complete, and up-to-date for the purpose(s) it is being used for. Cycling BC will not routinely update personal information unless collected for a purpose that requires continual use, including information disclosed to third parties.
- **Safeguards:** Cycling BC will protect personal information with security safeguards appropriate for the sensitivity of the information held. Cycling BC will protect personal information against loss or theft, unauthorized access, disclosure, copying, use or modification, regardless of the format in which it is stored (paper, electronic, etc). Cycling BC will determine which physical, organizational, and technological protection methods best suits the personal information held.
- **Openness:** Cycling BC shall make this policy and any procedures related to protecting personal information readily available in a generally understandable form.
- **Individual Access:** Cycling BC will, upon an individual's request, make known to that individual the existence, use, and disclosure of personal information and provide the individual access to it, provided Cycling BC has applied reasonably stringent identification criteria to ensure Cycling BC is communicating with the correct individual. Cycling BC will collect 'identifying' information only for identification purposes and will neither hold that information once it has served its purpose nor seek to use stringent identification requests as a barrier to access. If an individual challenges the accuracy or completeness of their personal information, Cycling BC will correct, delete or add personal information as appropriate.
- **Challenging Compliance:** Individuals may challenge Cycling BC's compliance with any of the principles set out herein by communicating directly with the CEO. The CEO shall investigate, or cause to have investigated, every complaint made against Cycling BC in this regard and shall ensure that the investigation results (any conclusion and any effect on Cycling BC policy or procedure) are made known to the complainant.

Date Reviewed: May 2023

Date approved: August 2023