**Personal Information & Protection of Privacy Form**

**General**

Connections Place Society respects and upholds an individual’s right to privacy and protection of their personal information. Connections Place Society is committed to ensuring compliance with applicable privacy legislation and has developed policy and practices to achieve this end. Connections Place Society maintains a Privacy Officer who is responsible for the agency’s compliance with this policy.

**Purposes for Collection, Use & Disclosure**

Collecting personal information is essential in order to be able to meet the needs of members, donors, employees, volunteers and/or authorized third parties. While the personal information Connections Place Society collects may come directly from the individual to whom the information relates, it may also be provided through third parties. Because the nature of Clubhouse work engages both staff and members, member information – specifically contact information – may be shared with members performing administrative or reach-out tasks.

Personal information may be used:

* To determine eligibility for services
* To understand and assess members’ ongoing needs and offer services and/or referrals that would best meet those needs
* For billing and accounting purposes
* To administer payroll, benefits, and other services to employees
* To comply with legal and regulatory requirements
* To administer programs and services with employees, volunteers, and members
* To comply with contractual obligations with funders
* To communicate for purposes related to the work of the organization
* To recognize contributions to the work of the organization

Personal information may also be used for other purposes, subject to Connections Place Society obtaining prior consent for such use.

**Disclosure of Personal Information to Third Parties**

The only circumstances under which personal information may be disclosed to third parties is for the fulfillment of purposes identified above, or as required by law. When personal information is disclosed to third parties, Connections Place Society shall ensure that appropriate security measures are in place to protect its transfer and use.

**Limiting Collection, Use, Disclosure & Retention of Personal Information**

Connections Place Society collects personal information only for the purposes identified above. Any information collected for purposes not identified above shall be done only by consent of the parties involved. Connections Place Society shall neither use nor disclose personal information for any purpose other than that for which it was collected, except with consent or as required by the law. Personal information shall be retained only as long as necessary for the fulfillment of the purposes for which it was collected, or as required by the law. Connections Place Society shall make all reasonable efforts to ensure that personal information is accurate, complete, and current, as required for the purposes for which it was collected.

**Security & Storage of Personal Information**

Connections Place Society protects personal information with appropriate security safeguards including physical, administrative, and electronic safety measures. Connections Place uses a Client Relationship Management (CRM) software program called Volgistics to store member information. Volgistics incorporates many of the same mission-critical security and privacy protections as those used by online banking services. Additionally, Volgistics uses a layered approach to security, and strives to follow industry standard 'best practices' at each level. Security begins with the physical security of the Volgistics data center, continues to network security, and ends with the protection of the data itself. We also store some information using Google Drive. We do not allow storage in Google Drive of higher-risk information such as contact details, private health information, legal matters, or personal matters. It is important to note that Volgistics and Google Drive servers are located in the United States.

**Access to Personal Information**

Members have the right to access their personal information under the control of Connections Place Society. The Privacy Officer will assist with access requests. In certain exceptional situations, Connections Place Society may not be able to provide access to personal information that it holds about an individual. If access cannot be provided, Connections Place Society will notify the individual in writing of the reason for refusal. A response to a request for access to personal information shall be provided within 30 days of receipt of request.

**Responsibility**

Connections Place Society is not responsible for injury or illness from attendance, loss of personal possessions, activities, or meals at or related to the Clubhouse.

**Questions or Concerns Regarding Privacy**

Questions or concerns regarding this policy and/or Connections Place Society’s compliance with it should be directed to:

Privacy Officer, Connections Place Society

3375 Oak Street, Victoria, BC V8X 1R2

250-483-3748

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Full Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_