

WILLIAMS LAKE AND DISTRICT CREDIT UNION PRIVACY CODE

At Williams Lake and District Credit Union it is understood that privacy is a critical issue for all members. This Privacy Code outlines the Credit Union's principles and procedures with respect to the confidentiality and security of members' personal information, and ensures compliance with the Personal Information Protection Act (BC).

This code outlines the principles Williams Lake and District Credit Union applies when protecting members' privacy. Ensuring the accuracy, confidentiality, and security of the information held regarding members is more than a legal requirement; it is an ethical obligation.

Definitions

The following definitions apply in this Code:

- Collection* The act of gathering, acquiring, or obtaining personal information from any source, including third parties, by any means.
- Consent* Involves voluntary agreement with what is being done or proposed. Consent may be either expressed or implied. Express consent is given explicitly, orally or in writing, it is unequivocal, and it does not require any inference on the part of Williams Lake and District Credit Union. Implied consent arises when Williams Lake and District Credit Union can reasonably infer consent based upon the action or inaction of the member.
- Disclosure* The act of making personal information available to others outside Williams Lake and District Credit Union.
- Member* Where the term "member" is used, the intent is to include both members and non-members of Williams Lake and District Credit Union. The code applies equally to the collection, use or disclosure of the personal information of all members.
- Personal Information* Information about an identifiable individual that is recorded in any form, with the exception of the individual's name, business title, business address and business phone number.
- Subsidiary* A company or organization wholly owned or controlled by Williams Lake and District Credit Union.
- Third Party* An individual or organization other than Williams Lake and District Credit Union or the member.

Use Refers to the treatment and handling of personal information by Williams Lake and District Credit Union.

1. Accountability

- 1.1 Williams Lake and District Credit Union is accountable for the protection of the personal information of its members. Ultimate accountability for the Credit Union's compliance with the principles rests with Williams Lake and District Credit Union's Board of Directors, who delegate day-to-day accountability to the Privacy Officer. Other individuals within the Credit Union may be accountable for day-to-day monitoring for compliance.
- 1.2 Williams Lake and District Credit Union has developed policies and procedures to protect personal information, receive and respond to complaints and inquiries, train staff regarding the policies and procedures, and communicate the policies and procedures to its members.
- 1.3 Williams Lake and District Credit Union will use contractual or other reasonable means to ensure that third party suppliers who assist in providing services to its members implement a comparable level of personal information protection.
- 1.4 Williams Lake and District Credit Union has a training program in place to ensure all new hires undergo training on the Personal Information Protection Act (BC). This training is repeated every second year after initial training.

2. Identifying Purposes

- 2.1 All personal information collected by Williams Lake and District Credit Union in the course of conducting its business is generally considered to be sensitive. The Credit Union will communicate the purposes for which information is being collected either orally or in writing.
- 2.2 The purposes for which the Credit Union collects personal information are as follows:
 - to contact members directly for products and services that may be of interest;
 - to verify members' identity;
 - to determine the eligibility of members for different products and services;
 - to develop, offer and manage products and services that meet members' needs;
 - to provide an ongoing high standard of service to members;
 - to safeguard the financial interests of the Credit Union;
 - to assess creditworthiness;
 - to detect and prevent fraud;
 - to meet regulatory requirements; and
 - to provide financial services.

3. Consents

- 3.1 Williams Lake and District Credit Union will obtain the consent of the member for the collection, use, or disclosure of personal information, except in specific circumstances permitted by the governing legislation. Williams Lake and District Credit Union will make reasonable efforts to ensure that members understand how their personal information is used and disclosed.
- 3.2 A member can give consent: (a) in writing, such as when completing and signing an application; (b) through inaction, such as not checking a box indicating that they do not wish their names and addresses to be used for optional purposes; (c) orally, such as when information is collected over the telephone or in person; (d) at the time they use a product or service; and (e) through an authorized representative, such as a legal guardian or a person having power of attorney.
- 3.3 A member may withdraw consent at any time, subject to legal or contractual restrictions, provided that: (a) reasonable notice of withdrawal of consent is given to the Credit Union; (b) the consent does not relate to a credit product requiring the collection and reporting of personal information after credit has been granted; (c) the withdrawal of consent is in writing; and (d) the member understands that the Credit Union may subsequently not be able to provide the member with related products or services.
- 3.4 Williams Lake and District Credit Union may collect information without the member's knowledge or consent in exceptional circumstances:
- when such collection, use or disclosure is permitted or required by law;
 - when use of information is for acting in an emergency that threatens an individual's life, health, or personal security;
 - when certain information is publicly available;
 - when the Credit Union requires legal advice from a lawyer;
 - when the Credit Union needs to collect a debt from a member; or
 - when the Credit Union needs to deal with an anticipated breach of law.

4. The Collection of Personal Information

- 4.1 Williams Lake and District Credit Union will limit the collection of personal information to that which is necessary for the purposes identified by the Credit Union. Williams Lake and District Credit Union will collect information by fair and lawful means.

5. Limiting Use, Disclosure and Retention

- 5.1 Williams Lake and District Credit Union shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the member or as required by law.

- 5.2 When disclosing personal information, Williams Lake and District Credit Union will take reasonable steps to protect the interests of its members.
- 5.3 Williams Lake and District Credit Union may share personal information with its subsidiary and third party providers only with the consent of the member and as permitted by law.
- 5.4 Williams Lake and District Credit Union will retain personal information only as long as necessary to fulfill the identified purposes or as required by law. Personal information that is no longer required to fulfill the identified purposes will be destroyed, erased or made anonymous.
- 5.5 Williams Lake and District Credit Union may periodically use members' personal information to conduct member surveys in order to enhance the products and services offered to its members. If a third party is contracted to conduct these surveys, Williams Lake and District Credit Union will ensure confidentiality clauses are included in the contractual arrangement to protect the transfer of personal information.

6. Accuracy

- 6.1 Williams Lake and District Credit Union will make reasonable efforts to ensure that the personal information it collects, uses and discloses is accurate, complete and up to date. The Credit Union relies on its members to ensure that certain personal information, such as address and telephone numbers, is current and up to date. Williams Lake and District Credit Union will inform members as to how to verify and correct their personal information
- 6.2 Williams Lake and District Credit Union will update personal information only as necessary to fulfill the purposes for which the information is collected, or as required to service membership privileges or maintain an active account.
- 6.3 Whenever possible, Williams Lake and District Credit Union will ensure that personal information disclosed to third parties, such as suppliers and agents who assist in providing services to members, is accurate.

7. Safeguarding Personal Information

- 7.1 Williams Lake and District Credit Union and its directors, officers and employees are committed to safeguarding members' personal information against loss, theft and unauthorized access, use, copying, modification, disclosure and disposal.
- 7.2 Williams Lake and District Credit Union will employ electronic and physical security safeguards appropriate to the sensitivity level of personal information. The safeguards will include physical security of cabinets, offices and data centers; electronic measures such as

passwords, encryption and employee numbers; and investigative measures such as where the Credit Union has reasonable grounds to believe that personal information is being inappropriately collected, used or disclosed.

- 7.3 Third parties providing services to Williams Lake and District Credit Union, including cheque printing and data processing, must safeguard personal information disclosed to them in a manner consistent with the policies of the Credit Union.
- 7.4 Williams Lake and District Credit Union will take due care with the destruction of personal information so as to prevent unauthorized parties from gaining access to the information.

8. Openness

- 8.1 Williams Lake and District Credit Union will make available to members information about its policies and practices relating to the management of personal information.
- 8.2 Williams Lake and District Credit Union will communicate information to members in a format that is generally understandable. The information made available will include:
- the title and address of the Privacy Officer;
 - the means of gaining access to personal information;
 - a description of the type of personal information held by the Credit Union;
 - a copy of brochures and other member information that explain the policies and procedures;
 - the type of personal information made available to service suppliers and related organizations such as subsidiaries and affiliated companies; and
 - advice regarding the process for making inquiries and complaints.

9. Access

- 9.1 Members have a right to access their personal information held by Williams Lake and District Credit Union. Upon request, Williams Lake and District Credit Union will, within a reasonable time period, communicate in understandable terms to the member what personal information it has, what it is being used for, and to whom it has been disclosed, if applicable, within the record retention time period.
- 9.2 Williams Lake and District Credit Union will make information available within 30 days, or provide written notice of extension where additional time is required to fulfill the request. When information is not provided within 30 days of the request, Williams Lake and District Credit Union will, no later than 30 days after the date of the request, send a notice of extension to the member, advising of the new time limit, the reasons for extending the time limit and of the right of the member to make a complaint to the Privacy Commissioner regarding the extension.

- 9.3 A member may be required to be specific about the information they would like to access and to submit their request in writing to the Privacy Officer.
- 9.4 Members will be required to provide sufficient personal information to identify themselves so as to enable Williams Lake and District Credit Union to provide an account of the existence, use and disclosure of their personal information.
- 9.5 If a member demonstrates the inaccuracy or incompleteness of personal information, the Credit Union shall amend the information as required. If appropriate, the amended information shall be transmitted to third parties with access to the information at issue.
- 9.6 When a challenge regarding the accuracy of personal information is not resolved to the satisfaction of the member, the substance of the unresolved challenge shall be recorded by Williams Lake and District Credit Union. If appropriate, the existence of the unresolved challenge shall be transmitted to third parties with access to the information at issue.
- 9.7 Williams Lake and District Credit Union will provide in writing to the member the estimated fee for the requested information. Fees may vary with the type and amount of information requested.
- 9.8 Williams Lake and District Credit Union may not be able to provide all or part of the personal information requested from a member. Williams Lake and District Credit Union must provide in writing the reasons for refusal. Reasons for not providing information may include information that would threaten the life or security of another individual, the information was generated in the course of a formal dispute resolution process, the information is protected by solicitor-client privilege, or access that would reveal personal information about a third party.

10. Challenging Compliance and Complaints

- 10.1 Members may direct any inquiries or complaints regarding this Privacy Code or their personal information to Williams Lake and District Credit Union's Privacy Officer. In the absence of the Privacy Officer, members' concerns or issues can be referred to the office of the Chief Executive Officer. At any point in this process, the members may also write to the Privacy Commissioner.
- 10.2 Williams Lake and District Credit Union will make every effort to respond to member inquiries or complaints as quickly as possible within 30 days.

11. Policy Approval and Review

- 11.1 This policy, and any subsequent recommended changes to this policy, must be approved by the Board of Directors.
- 11.2 The Board will review this policy annually for its ongoing appropriateness.