

Co-op Privacy Policy

Purpose of Policy

To protect the dignity of members and the security of personal information the Co-op may gather on individuals, in compliance with the *Personal Information Protection Act* (PIPA) and its principles.

Definition

“Personal information” under PIPA means information about an identifiable individual. It includes employee personal information but does not include work contact information or work product information.

Policy

1. The Board will appoint a Personal Information Protection Officer (PIP officer).
2. The Board will:
 - a. provide PIP officers with a job description outlining duties in relation to PIPA and its principles;
 - b. ensure PIP officers receive appropriate training;
 - c. ensure PIP officers fulfill their duties;
 - d. co-operate fully with PIP officers in the performance of the officers’ duties and in implementation of the policy; and,
 - e. communicate the name and contact information of the PIP Officer to all members.
3. The Co-op shall only collect the personal information that it requires to ensure sound management of the co-op and to fulfil its obligations to its members, its contractual obligations, and any legal requirements.
4. The Co-op shall use and share personal information only with the consent of the individuals concerned, or as provided for in PIPA.
5. The Co-op will store documents that contain personal information securely to prevent unauthorized use. The Co-op will destroy personal information when the Co-op no longer needs it.
6. Individuals will, on written request, have access to any personal information that the Co-op has about them. The Co-op will provide the information within **thirty (30) days**, except where to do so would be in violation of PIPA. The Co-op will correct any errors in personal information that the individual brings to its attention.
7. All directors will sign the *Ethical Conduct Agreement* that includes a confidentiality section. Management staff and any designated members who have access to some personal information or Co-op confidential information will also sign an ethical conduct agreement.
8. Discussion that will result in sensitive personal information appearing in the minutes will be held *in camera*. Minutes of the *in-camera* portion of meetings will be kept separate from the regular minutes, and stored securely, to prevent unauthorized use.
9. In the event of any conflict between the provisions this policy and the *Personal Information Protection Act*, and any other applicable legislation, the terms of the relevant legislation will prevail.

Status: **Approved**

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