

WEST COAST IN-HOME CARE INC.

Personal Information Protection Policy

At West Coast In-Home Care, we are committed to providing our Clients, Members and Applicants, with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our Clients, Members and Applicants, protecting their personal information is one of our highest priorities.

While we have always respected our Clients, Members and Applicants, 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.

We will inform our Clients, Members and Applicants, 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 Clients, Members and Applicants, personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our Clients, Members and Applicants, personal information and allowing our Clients, Members and Applicants, to request access to, and correction of, their personal information.

Definitions

Personal Information; means information about an identifiable *individual*. *E.g., including name, age, home address and phone number, social insurance number, marital status, religion, income, credit history, medical information, education, and employment information.* 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 West Coast In-Home Care Inc. complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the Clients, Members and Applicants, 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 Clients, Members and Applicants, information that is necessary to fulfill the following purposes:
 - To verify identity;
 - To verify creditworthiness;
 - To identify [client, customer, member] preferences;
 - To understand the [financial, banking, insurance] needs of our [clients, customers, members];
 - To contact our Clients, Members and Applicants
 - To ensure a high standard of service to our Clients, Members and Applicants
 - To meet regulatory requirements;
 - To collect and process payments;

Policy 2 – Consent

- 2.1 We will obtain Clients, Members and Applicants, 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 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 Clients, Members and Applicants, voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a Clients, Members and Applicants, is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products, fundraising and the Clients, Members and Applicants, 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), Clients, Members and Applicants, can withhold or withdraw their consent for West coast In-Home Care to use

their personal information in certain ways. A Clients, Members and Applicants, 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 Clients, Members and Applicants, in making the decision.

2.5 We may collect, use or disclose personal information without the Clients, Members and Applicants, 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 a debt;
- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law

Policy 3 – Using and Disclosing Personal Information

3.1 We will only use or disclose Clients, Members and Applicants, 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 conduct client, customer, member surveys in order to enhance the provision of our services;
- To contact our [clients, customers, members] directly about products and services that may be of interest

3.2 We will not use or disclose Clients, Members and Applicants, personal information for any additional purpose unless we obtain consent to do so.

3.3 We will not sell Clients, Members and Applicants, lists or personal information to other parties.

Policy 4 – Retaining Personal Information

4.1 If we use Clients, Members and Applicants, personal information to make a decision that directly affects the Clients, Members and Applicants, we will retain that personal information for at least one year so that the Clients, Members and Applicants, has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, we will retain Clients, Members and Applicants, personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

Policy 5 – Ensuring Accuracy of Personal Information

- 5.1 We will make reasonable efforts to ensure that Clients, Members and Applicants, personal information is accurate and complete where it may be used to make a decision about the Clients, Members and Applicants, or disclosed to another organization.
- 5.2 Clients, Members and Applicants, 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.
- 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 Clients, Members and Applicants, correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of Clients, Members and Applicants, 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 Clients, Members and Applicants, personal information is appropriately protected:
- 6.3 We will use appropriate security measures when destroying Clients, Members and Applicants, personal information such as shredding documents, deleting electronically stored information.
- 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 Clients, Members and Applicants, Access to Personal Information

- 7.1 Clients, Members and Applicants, have a right to access their personal information, subject to limited exceptions.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought
- 7.3 Upon request, we will also tell Clients, Members and Applicants, 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 minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the Clients, Members and Applicants, of the cost and request further direction from the Clients, Members and Applicants, on whether or not we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify the Clients, Members and Applicants, in writing, providing the reasons for refusal and the recourse available to the Clients, Members and Applicants,

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



- 8.1 The Privacy Officer is responsible for ensuring West Coast In-Home Care Inc. compliance with this policy and the Personal Information Protection Act.
- 8.2 Clients, Members and Applicants, should direct any complaints, concerns or questions regarding West coast In-Home Care compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the Clients, Members and Applicants, may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for West coast In-Home Care:

Address: 1100-1200 West 73rd Avenue Vancouver, BC V6P 6G5

Toll Free: 1.855.304.2273

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