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# HASTINGS SUNRISE COMMUNITY POLICING CENTRE

## Privacy Policy

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At the Hastings Sunrise Community Policing Centre (HSCPC), we are committed to providing the citizens and volunteers of the Hastings Sunrise neighborhood with exceptional service. Providing this service may require the collection, use, and disclosure of personal information you provide to the HSCPC. Any personal information you provide to the HSCPC will be collected, used, and disclosed in accordance with the Personal Information Protection Act (PIPA) and this Privacy Policy. Learn more about the Personal Information Protection Act at the [Office of the Information and Privacy Commissioner for British Columbia](#).

The HSCPC does not automatically gather personal information from you, such as your name, phone number, street, or e-mail address. We obtain this information when you provide it voluntarily, for example, to receive our newsletter, to complete a volunteer application, to apply for membership, or to report a complaint or concern.

This Privacy Policy is not a contract; however, the HSCPC is committed to adhering to the principles and practices set out in this Privacy Policy to reasonably ensure the accuracy, confidentiality, and security of your personal information as required by the PIPA.

The HSCPC website contains links to other sites. Please be aware that the HSCPC is not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every website that collects personally identifiable information. This Privacy Policy applies solely to information collected and used by the HSCPC.

If you have any questions or concerns about the HSCPC's Privacy Policy, please see the contact information for the HSCPC Privacy Officer at the end of this policy.

### Definitions

**Personal Information** has the same meaning as in the PIPA. Personal information does not include business contact or work product information related to an employee's or volunteer's role with the HSCPC. For greater certainty, personal information does not include the contents of any complaints that have been recorded in the HSCPC's complaint system(s), except information that is used to identify and communicate with a citizen that initiates a complaint.

**Services** refers to the activities of the HSCPC and its partners, including, but not limited to, recording citizen complaints and concerns, conveying citizen complaints and concerns to the NPO, VPD, and City Staff, advising citizens on the progress of their complaint or concern, and providing newsletters or other information to citizens.

**Privacy Officer** is the designated individual responsible for administering the HSCPC's Privacy Policy.

**Neighbourhood Police Officer (NPO)** is a Vancouver Police Department (VPD) designate that is assigned to the HSCPC to provide community policing services to the Hastings Sunrise neighborhood.

**VPD Staff** is VPD employee (civilian or police member), including an NPO.

**City Staff** is an employee of the City of Vancouver, including VPD Staff.

**OIPC** is the Office of the Information and Privacy Commissioner of British Columbia.

### **Collecting Personal Information**

- 1.1 We may collect personal information from you, including via our website, to provide the services offered by the HSCPC or its partners, including:
- To record citizen complaints and concerns, including any contact information, to provide to the NPO, VPD and City staff for follow-up;
  - To update citizens on the progress of their complaint or concern, as necessary and at our discretion.

### **Consent**

- 2.1 By providing your personal information to us, or accessing our website, you are deemed to have consented to the HSCPC's collection, use, retention, and disclosure of any personal information you provide to us, in accordance with our Privacy Policy.
- 2.2 You may withdraw or modify your consent to our collection, use, retention, or disclosure of your personal information at any time, unless we are required to collect, use, retain, or disclose your information by law. You must provide reasonable notice in writing that you are withdrawing or modifying your consent, and include sufficient details to allow us to identify the extent or nature of the modification or withdrawal of consent, and the affected personal information. Notice of your withdrawal or modification of consent should be sent to the Privacy Officer or its designate.
- 2.3 We may request that you provide valid government ID to confirm your identity when you withdraw or modify your consent to our collection, use, retention, or disclosure of your personal information. If you are withdrawing or modifying consent on behalf of someone else, including a minor or deceased individual, we will require that you provide the necessary documentation to confirm you are that individual's legal or authorized representative under the PIPA.
- 2.4 If you give us notice that you wish to withdraw or modify your consent to the collection, use, retention, or disclosure of your personal information, we may, in our sole discretion, decide not to provide any or all services to you for a specified or indeterminate period of time.
- 2.5 We may collect, use, retain, or disclose personal information without your consent in the following limited circumstances:
- When the collection, use, retention, 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 we require legal advice from a lawyer; or
  - When the information is publicly available, not considered to be personal information, or where there is no reasonable expectation of privacy.

## Using and Disclosing Personal Information

- 3.1 We may use or disclose personal information you provide to us when it is reasonably necessary to provide services to you, such as:
- To record citizen complaints and concerns to provide to the NPO, VPD Staff, and/or City Staff for follow-up;
  - To update citizens on the progress of their complaint/concern; and/or
  - To assist our partners, including VPD Staff and City Staff, in providing services to you.
- 3.2 We will not sell or share your personal information with other parties, unless we have your express consent to do so or unless otherwise permitted under this Privacy Policy.

## Securing Personal Information

- 4.1 The HSCPC ensures the security of your personal information through reasonable physical, administrative, and technical safeguards to protect it from unauthorized access, collection, use, disclosure, copying, modification, disposal, or similar risks.
- 4.2 We will use security measures to protect personal information that are commensurate with the level of privacy that is reasonably expected in the circumstances.
- 4.3 We will destroy personal information by secure means following the expiry of the applicable retention period summarized in **Schedule A**.
- 4.4 We will continually review and update our security policies and controls to maintain reasonable safeguards to secure your personal information.

## Retaining Personal Information

- 5.1 We will retain your personal information pursuant to the applicable retention periods summarized in **Schedule A**, which periods are reasonably required to fulfill the purposes for which the information was collected, or for any legal purposes.

## Correction Requests

- 6.1 We will make reasonable efforts to ensure that personal information is accurate and complete, particularly where the information may be used to make a decision that will affect you. We rely on you to notify us if there is a change to your personal information that may affect your relationship with the HSCPC.
- 6.2 If you believe your personal information is not accurate or complete, you may request a correction to your personal information. You must make a request to correct your personal information in writing and provide sufficient details to allow us to identify the personal information and correction being sought. A request to correct personal information should be sent to the Privacy Officer or its designate.

- 6.3 We may request that you provide valid government ID to confirm your identity when you request a correction to your personal information. If you are requesting a correction on behalf of someone else, including a minor or deceased individual, we will require that you provide the necessary documentation to confirm you are that individual's legal or authorized representative under the PIPA.
- 6.4 The Privacy Office or its designate will decide, on reasonable grounds, if your personal information should be corrected. If the Privacy Officer or its designate decides to correct the information, we will correct the information as soon as possible and, if necessary, send the corrected information to the NPO or City Staff to which we disclosed the personal information.
- 6.5 If the Privacy Officer or its designate decides not to correct your personal information, a copy of your correction request will be attached to or noted on your personal information.

### **Access to Your Personal Information**

- 7.1 You may request access to your personal information, including information on how we have used or are using your personal information, and who we have disclosed the information to, subject to the exceptions in the PIPA, which include:
- When the disclosure would reveal personal information about another individual;
  - When the disclosure could reasonably be expected to threaten the safety or physical or mental health of an individual other than you;
  - When the disclosure can reasonably be expected to cause immediate or grave harm to your safety or physical or mental health;
  - When the disclosure would reveal the identity of an individual who has provided personal information about you or another individual, and the individual providing the personal information does not consent to the disclosure of his or her identity.
- 7.2 A request to access your personal information must be made in writing and provide sufficient detail to allow us to identify the personal information being sought with reasonable effort. A request to access personal information should be sent to the Privacy Officer or its designate.
- 7.3 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.
- 7.4 We may request that you provide valid government ID to confirm your identity when you request access to your personal information. If you are requesting access on behalf of someone else, including a minor or deceased individual, we will require that you provide the necessary documentation to confirm you are that individual's legal or authorized representative under the PIPA.
- 7.5 If your request is refused in full or in part, we will notify you in writing, and provide the reasons for our refusal, along with the contact information for someone who can answer your questions about our refusal and any other recourse available to you.

## **The Role of the Privacy Officer or Designated Individual**

- 8.1 The Privacy Officer is responsible for ensuring the HSCPC's reasonable compliance with this Privacy Policy and the *Personal Information Protection Act*.
- 8.2 You may direct any complaints, concerns, or questions regarding the Privacy Policy or our compliance with the policy in writing to the Privacy Officer.
- 8.3 If the Privacy Officer is unable to resolve the concern, you may also write to the Information and Privacy Commissioner of British Columbia.

Contact Information for the HSCPC Privacy Officer:

**Clair MacGougan, Executive Director**

Ph: 604-717-3584

Email: [clairm@hscpc.com](mailto:clairm@hscpc.com)

## **Office of the Information and Privacy Commissioner for British Columbia:**

Telephone: (250) 387-5629

Email: [info@oipc.bc.ca](mailto:info@oipc.bc.ca)

Mailing: Office of the Information and Privacy Commissioner for British Columbia  
PO Box 9038, Stn. Prov. Govt.  
Victoria, BC V8W 9A4

Location: 4<sup>th</sup> Floor, 947 Fort Street, Victoria, BC, V8V 3K3

## Schedule A

### HSCPC Guidelines on the Retention and Disposal of Personal Information and Other Documents

Information/Document	Length of Time to Retain
Complaints	2 years [from time of closing complaint]
Community Participant Files	1 year from date of last participation
Personnel Files (including volunteers and employees)	4 years after termination date
Unsuccessful Volunteer Applications	1 year after decision or last activity
Program/Activities Information	2 years after program or activity end date