# PRIVACY POLICY FOR (NAME OF MSA)

The Name of MSA subject to the BC Personal Information Protection Act with respect to their collection, use, disclosure and retention of personal information

The Name of MSA collects, uses, and discloses personal information about individuals to:

• provide and administer services to its clients

• develop, manage, protect, and improve its services

• conduct customer satisfaction surveys

• comply with legal requirements and

• manage its operations

# Privacy Principles

Ten interrelated principles form the basis of the Privacy Policy.

# Accountability for Personal Information

The organization is responsible for personal information under its control and will designate individuals accountable for its compliance with the following principles.

# Identifying Purposes for Personal Information

The organization identifies the purposes for which personal information is collected at or before the time the information is collected.

# Consent for Personal Information

The organization requires the individual's knowledge and consent for its collection, use, or disclosure of personal information, except where inappropriate or not required by law.

# Limiting Collection of Personal Information

The organization limits its collection of personal information to what is necessary for its identified purposes and uses information collected by fair and lawful means.

# Limiting Use, Disclosure and Retention of Personal Information

The organization does not use or disclose personal information for purposes other than those for which it was collected, except with the individual's consent or as required by law. Personal information is retained only as long as necessary to fulfill those purposes.

# Ensuring Accuracy of Personal Information

The organization ensures that personal information is as accurate, complete, and up-to-date as necessary for the purposes for which it is to be used.

# Openness about Personal Information Policies and Practices

The organization makes specific information about its policies and practices for managing personal information readily available to individuals.

# Safeguards for Personal Information

The organization protects personal information using security safeguards appropriate to the sensitivity of the information.

# Individual Access to Personal Information

Upon request, the organization will inform an individual of the existence, use, and disclosure of his or her personal information and will give access to that information. An individual will be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

# Challenging Compliance with the Privacy Policy

An individual can address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization’s compliance and to the Office of the BC Information and Privacy Commissioner.

# Breach Reporting

A privacy breach occurs when there is unauthorized access to or collection, use, disclosure, or disposal of personal information. The most common privacy breach happens when the personal information of customers, patients, clients, or employees is stolen, lost, or mistakenly disclosed. Examples include when a computer containing personal information is stolen, or personal information is mistakenly emailed to the wrong person.

Any staff member or contractor who becomes aware of a privacy breach is responsible for notifying the Privacy Officer or their manager immediately.

The Privacy Officer will

* identify the information, cause and extent of the breach
* determine the number of individuals affected
* contain the breach
* evaluate risks and determine whether harm could come to affected parties
* collaborate with management on notification to affected parties
* report to the Office of the Privacy Commissioner for BC on the prescribed form
* determine if any other parties should be notified
* cooperate with authorities during breach investigations

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This Privacy Policy is to be read in conjunction with the associated Privacy Procedures. Questions about this Privacy Policy can be directed to the Privacy Officer at [privacy](file:///%5C%5Cfile1%5Cdata%5CReference%5CPolicies%20%26%20Procedures%5CFinance%5CRisk%20%26%20Compliance%5Cprivacyofficer%40doctorsofbc.ca)officer@\_\_\_\_\_\_\_.

*This privacy policy is based on Schedule 1 of the federal Personal Information Protection and Electronic Documents Act (PIPEDA), which is, in turn, based on the Canadian Standards Association’s Model Code for the Protection of Personal Information. The organization is subject to British Columbia’s Personal Information Protection Act (PIPA), which the federal government has deemed to be substantially like PIPEDA. It is also subject to independent oversight by the BC Information and Privacy Commissioner* [*www.oipc.bc.ca*](http://spinternal/Compliance/Templates/www.oipc.bc.ca)*.*