

Operational Privacy Policy

Purpose

This privacy policy outlines how and when personal information is collected, used and disclosed by employees and service providers of the Office of the Information and Privacy Commissioner (OIPC) and the Office of the Registrar of Lobbyists (ORL) (collectively, we or the OIPC/ORL). This policy complements the [OIPC](#) and [ORL](#) website privacy policies.

Policy Statement

We are committed to excellence in discharging our legislated duties and responsibilities to all those we serve. Protecting the personal information, we collect, use and disclose in the course of our work is one of our highest priorities.

The OIPC is subject to some but not all of the protection of privacy provisions in the *Freedom of Information and Protection of Privacy Act* (FIPPA). Nevertheless, we generally collect, use and disclose personal information of individuals in accordance with FIPPA.

Our privacy commitment includes ensuring the confidentiality and security of personal information and processing individuals requests for access to, and correction of, their personal information.

All staff take an Oath of Confidentiality to not disclose any information obtained in the performance of their duties unless authorized by FIPPA, noting that we are permitted to disclose information under the *Lobbyists Transparency Act* (LTA), the *Personal Information Protection Act* (PIPA) and FIPPA, in certain circumstances. Staff also attend annual privacy training.

Definitions

Personal Information means recorded information about an identifiable individual other than contact information.

Contact information means information that would enable an individual to be contacted at a place of business. It includes name, position name or title, business telephone number, business address, business email, or business fax number of the individual.

Privacy Officer means the individual designated responsibility for ensuring that the ORL and OIPC comply with this policy and FIPPA.

Procedures

1. Collecting personal information

1.1 We collect personal information that is necessary to fulfill purposes related to our programs or activities including:

- to verify identity;
- to contact the individual with regard to a request for review or complaint;
- to open a file and process a complaint or request for review;
- to open a file and process an access request under FIPPA;
- to respond to a breach;
- to collect, use, and disclose information required under the LTA or FIPPA; and
- to otherwise fulfill any other duties under PIPA, FIPPA and the LTA.

1.2 Examples of personal information we may collect include:

- Personal contact information (name, address, email, phone number);
- Personal information contained in records responsive to an access request, complaint, or request for correction;
- Personal information of individuals subject to regulatory action; and
- Context-dependent personal information that may relate to any other file, investigation or work undertaken by the Offices as authorized in relation to the exercise of the powers of the Commissioner and Registrar.

2. Using and disclosing personal information

2.1 We use or disclose personal information when it is necessary for purposes related to our programs and activities, including in fulfilling our duties relating to the exercise of functions of the Information and Privacy Commissioner under an Act.

3. Retaining personal information

3.1 We retain personal information for as long as necessary to fulfill the purposes for which the information was collected or a legal or operational purpose and in accordance with our records retention schedules.

4. Correction of personal information

4.1 Applicants or complainants may request correction to their personal information. A request to correct personal information should be made in

writing and provide sufficient detail to identify the personal information and the correction being sought.

4.2 If the personal information is factually inaccurate, we may correct the information 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 applicant's correction request in the file.

5. Securing personal information

5.1 We are committed to ensuring the security of applicant or complainant personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal, or similar risks.

5.2 The following security measures are followed to ensure that applicant or complainant personal information is appropriately protected:

- Access to electronic files are controlled by userID and passwords with backups/redundancy protection.
- Remote access is only enabled through a secure Virtual Private Network (VPN) and controlled by userID and passwords.
- A secure, encrypted, and password protected File Transfer Protocol (FTP) server is available for transmitting or receiving records containing personal information.
- Physical files are stored in highly secure locations with multiple security protocols.
- All staff and contractors must review this privacy policy and are accountable for following appropriate procedures for handling personal information. Failure to comply with these procedures can result in discipline and/or termination.
- All staff are provided mandatory privacy training before handling personal information collected by the OIPC, and then annual training thereafter.

5.3 We use appropriate security measures when destroying records and files, including those containing personal information, such as shredding documents and deleting electronically stored information.

5.4 We continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

6. Providing access to personal information

6.1 In accordance with FIPPA, the OIPC/ORL may provide individuals with records under our control or in our custody, including those containing their personal information.

6.2 A request for records must be made in writing to the Privacy Officer and provide sufficient detail to identify the records being sought.

7. Questions and complaints

7.1 The Privacy Officer is responsible for ensuring the OIPC/ORL's compliance with this policy and FIPPA.

7.2 Corrections, requests, or questions may be directed in writing to the attention of the Privacy Officer.

7.3 The Privacy Officer may be contacted at:

Attn: Deputy Commissioner and Deputy Registrar
 P.O. Box 9038, Stn Prov Govt, Victoria BC V8W 9A4
 Tel: (250) 387-5629
 Fax: (250) 387-1696
 OIPC: info@oipc.bc.ca
 ORL: info@bcorl.ca

ADMINISTRATIVE POLICIES AND PROCEDURES	
Office of the Information and Privacy Commissioner Office of the Registrar of Lobbyists	
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