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### ***Disclaimer***

*This draft foundational document was prepared by a certified cybersecurity/GRC professional and is provided for general information only.* ***It is not legal advice.*** *Obtain independent legal review before adopting or relying on this policy.*

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### ***1. Who We Are***

Oak Bay Volunteer Services *(“****we****,” “****us****,” “****our****”) is a registered charity based in British Columbia, Canada.*

### ***2. Personal Information We Collect***

We collect the minimum personal information needed to carry out our activities, including:

* **Donor information** (e.g., name, contact details, donation amount, tax-receipt number).
* **Payment information** processed through a **[PCI-DSS-COMPLIANT PAYMENT GATEWAY]**. We do **not** store full card numbers.
* **Employee and volunteer records** (e.g., résumé, Social Insurance Number, driver’s abstract, performance information).
* **Limited health information** required to accommodate clients, employees, or volunteers.
* **Identity verification documents** (e.g., driver’s licence, passport) where legally necessary.
* **Program-delivery records** (e.g., address and duration of stay, staff-client interaction notes).
* **Technical logs** generated by our website or app (e.g., IP address, device type).

### ***3. Why We Collect, Use, or Share Personal Information***

We use personal information only for purposes a reasonable person would consider appropriate in the circumstances, including to:

1. **Process donations and issue tax receipts** (Income Tax Act).
2. **Administer employment and volunteer relationships** (Employment Standards Act, Workers Compensation Act).
3. **Deliver programs and services** to clients.
4. **Meet legal and regulatory obligations**, including those under the **Personal Information Protection Act (PIPA)** and, where applicable, **Personal Information Protection and Electronic Documents Act (PIPEDA)**.
5. **Detect and prevent fraud or security incidents**.

*We do* ***not*** *sell or rent personal information.*

### ***4. Consent***

* We rely on **implied consent** for information you voluntarily provide for an obvious purpose (PIPA s 8).
* We obtain **explicit, written or checkbox consent** before collecting or using sensitive information such as health data or ID scans.
* You may **withdraw consent** at any time, subject to legal or contractual restrictions and reasonable notice.

### ***5. Cross-Border Storage and Access***

Some personal information may be stored or accessed outside Canada (e.g., cloud hosting, email, or payment processing in the United States).

* Before such transfers, we provide notice and obtain consent as required by **PIPA s 30.1**.
* Foreign service providers may be subject to the laws of their jurisdiction.

### ***6. Retention***

| **Record Type** | **Minimum / Maximum Retention** | **Legal Basis** |
| --- | --- | --- |
| Donation & tax-receipt records | **7 years** | Canada Revenue Agency |
| Employment & volunteer records | **Up to \_\_\_\_ years** after relationship ends | Employment & tax laws |
| Identity documents | Deleted after verification or when no longer required | PIPA ss 11, 35 |
| Health & program records | Only as long as necessary to deliver services or as required by law | PIPA ss 11, 35 |
| Technical logs | Retained only as long as needed for security or troubleshooting | PIPA s 35 |

When retention periods end we securely destroy or anonymize the information.

### ***7. Your Rights***

Under PIPA you may:

1. **Request access** to personal information we hold about you (s 23).
2. **Request corrections** to ensure accuracy (s 24).
3. **Withdraw consent** to further use (s 9).
4. **Complain** first to us and, if unresolved, to the **Office of the Information & Privacy Commissioner for BC (OIPC)**.

### ***8. Safeguards***

We employ **reasonable security arrangements** appropriate to the sensitivity of the information (PIPA s 34). Measures include physical, administrative, and technical controls to protect against loss, theft, and unauthorized access.

### ***9. Privacy Breach Notification***

If a breach creates a real risk of significant harm, we will notify affected individuals and the OIPC **as required under PIPA s 34.1** (and PIPEDA, if applicable) without unreasonable delay, and we will take steps to mitigate further risk.

***10. Contact – Privacy Officer Breach Notification***

[Full Name or Title, e.g., Privacy Officer or Executive Director]  
 [Charity Name]  
 [Street Address or PO Box]  
 [City, Province, Postal Code]  
 Email: [privacy@yourcharity.org]  
 Phone: [xxx-xxx-xxxx]  
 Subject Line: “Privacy Inquiry”We aim to acknowledge privacy-related requests within **5 business days**.

### ***11. Policy Review and Updates***

This policy is reviewed **at least annually** or when required by changes in law or our practices. The “Version & Date” line will indicate the most recent update.

*Thank you for supporting our mission and trusting us with your personal information.*