

Privacy Policy

Summary:

BC Non-Profit Housing Association's Privacy Policy explains how the Association collects, uses, shares, safeguards, and retains personal information about Staff and Members in accordance with applicable privacy laws in British Columbia. The Association limits collection and use to what is reasonable and necessary for legitimate business, service delivery, and employment purposes, and shares information only when authorized and on a need-to-know basis. Individuals may request access to and correction of their information and can raise questions or concerns with the Association's designated Privacy Officers.

Purpose:

The purpose of this **Privacy Policy** (the "**Policy**") is to establish a framework for the collection, use, disclosure and retention of Personal Information by the BC Non-Profit Housing Association (the "Association"). The Association respects and is committed to protecting the Personal Information that it collects and uses about its Staff and Members as required under all applicable privacy legislation, including, without limitation, the British Columbia Personal Information Protection Act (collectively, the "**Applicable Privacy Legislation**").

Scope:

This Policy applies to the Personal Information of Staff and Members.

Definitions:

In this Policy, the following terms have the following meanings:

- "**Members**" means any individual that accesses services provided by the Association.
- "**Personal Information**" refers to any information about an identifiable individual but does not include business contact information or work product information.
- "**Staff**" means employees and contractors of the Association.

Other terms not specifically defined in this section will have the meanings given to them elsewhere in this Policy or as otherwise defined.

Policy Details:

Purposes Of Collection

Staff

The Association collects, uses, discloses, processes, and maintains Personal Information about Staff for legitimate business reasons, for the purposes of establishing, managing and ending the employment relationship and for other purposes permitted under Applicable Privacy Legislation, including for:

- recruiting and hiring, including for purposes of verification of qualifications and conducting reference and background checks as reasonably required;
- improving and evaluating the Association's services, including by establishing training and development programs;
- staffing, scheduling and to administer vacations and other leaves;
- business, service delivery and Member continuity purposes;
- performance evaluation and monitoring;
- promotion, demotion and discipline;
- investigating specific incidents or disputes involving Staff, including Member disputes;
- monitoring compliance with policies and addressing security and internal control issues;
- payroll and benefits administration;
- ensuring safety in the workplace, including but not limited to preventing the spread of viruses and communicable diseases;
- protecting the Association's assets;
- determining and implementing workplace accommodations;
- communicating with Staff, such as with respect to important upcoming dates, changes to benefits, health and safety-related alerts and new program rollout information; and
- complying with the Association's legal, regulatory and contractual obligations.

Members

The Association collects, uses, discloses and maintains Personal Information about Members for legitimate business reasons and for other purposes permitted under Applicable Privacy Legislation, including for:

- accessing, improving and evaluating the Association's programs and services;
- maintaining and processing referrals;
- confirming Member eligibility to access services or programming offered by the Association;
- delivery of the Association's services;
- processing and collecting payments;
- identifying Member preferences;
- the safety and security of Members;
- responding to Member complaints and concerns;
- providing requested product, program or service information;
- informing Members of new products or services that may interest them; and
- complying with the Association's legal, regulatory and contractual obligations.

TYPES OF PERSONAL INFORMATION COLLECTED ABOUT STAFF AND MEMBERS

The information that the Association may collect for the above purposes includes information such as:

- an individual's name, contact information, social insurance number (SIN), and emergency contact information;
- information about an individual's employment history, education and qualifications;
- reference checks, proof of eligibility to work in Canada or citizenship information;
- an individual's financial and banking information needed for payroll and benefits administration;
- information about an individual's workplace performance and conduct;
- information to investigate workplace incidents;

- information about Member health and medical status and tax exemption status if reasonably needed for the delivery of Association services or programs;
- identity validation for Member access to certain Association services or programs;
- medical, dietary or physical restrictions or preferences;
- health information for the purposes of accommodation and benefits administration; and
- health information for the purposes of coordinating a response to a pandemic, epidemic or workplace illness.

The Association seeks to limit the scope of the Personal Information that it collects, uses and discloses about Staff and Members to what is reasonable and necessary in the circumstances.

CONSENT

The Association collects, uses and discloses Personal Information with the knowledge and consent of Staff and Members, except in circumstances in which Applicable Privacy Legislation permits or requires the Association to collect, use and disclose Personal Information without consent.

If the Association seeks to use Personal Information for other purposes that are not identified in this Policy, the Association will ask for consent before doing so, unless otherwise permitted under Applicable Privacy Legislation. Where required, individual consent will be obtained either in person, in writing, or by electronic means.

Consent may be implied in some situations while express consent is required for the collection, use, and sharing of sensitive Personal Information. “Implied consent” exists when an individual is “deemed” to consent to collection, use, or disclosure of Personal Information if the individual voluntarily provides it for a purpose that would, at the time, be considered obvious to a reasonable person. “Express consent” signifies that an individual, knowing what Personal Information is being collected and for what purposes, willingly agrees to the information being collected, used, and disclosed as notified. It may be given in writing or verbally.

Consent may be withdrawn at any time, on reasonable notice, subject to legal or contractual restrictions. The Association will inform individuals of the implications of withdrawal of consent, including where certain services or benefits may become unavailable as a result of the withdrawal.

HOW AND WHEN THE ASSOCIATION SHARES PERSONAL INFORMATION

The Association shares Personal Information internally only on a need-to-know basis and information shared between Staff must be limited only to that which is necessary for the purposes of fulfilling applicable job duties. The Association may also share Personal Information externally with, for example, its subsidiary, brokers, service providers, professional advisors (including but not limited to legal counsel, auditors, data analysts, accountants and insurers), employment and taxing authorities, or law enforcement officials for the purposes set out in this Policy or where authorized or required by law.

The Association uses web-based third-party service providers such as Bamboo HR and Payworks, to perform specialized services on its behalf such as data processing, payroll and benefits administration, customer relationship management and human resource management. Sometimes the Association's service providers come into contact with Personal Information. The Association only provides service providers with limited access to the information that is necessary for the applicable service to be performed. Some of these service providers may be located outside of Canada or outside of British Columbia and may, from other jurisdictions, collect, use, disclose, store, process or access the Personal Information. The Association takes steps to require service providers to keep Personal Information confidential and expects service providers to protect Personal Information in a manner that is consistent with this Policy, Applicable Privacy Legislation and the Association's security practices.

PROTECTION OF PERSONAL INFORMATION

The Association implements security safeguards to protect Personal Information against risks

such as loss or theft, as well as unauthorized access, disclosure, copying, use, storage or modification. These security safeguards will vary depending on the sensitivity of the information as well as the format in which the information is held and may include:

- Physical security measures such as locked filing cabinets and restricted access;
- Organizational measures such as access only on a “need to know” basis, and imposing internal limits on data to restrict access and disclosure;
- Technological measures such as the use of passwords, multi-factor authentication, firewalls and regular backups;
- Contractual measures such as taking reasonable steps to ensure that a comparable level of protection is implemented by service providers used by the Association; and
- Investigatory measures such as investigating non-compliance with this Policy and Applicable Privacy Legislation where the Association has reasonable grounds to believe that there has been an actual or suspected privacy breach or where Personal Information is otherwise being inappropriately collected, used, stored or disclosed.

ACCOUNTABILITY

The Association is responsible for the Personal Information under its control. The Association has appointed designated Privacy Officers who are accountable for the Association’s compliance with this Policy and with Applicable Privacy Legislation. The Association’s Privacy Officers can be contacted by writing to:

- Bryan Woo – Managing Director: bryan@bcnpha.ca
- Maria Montero – Finance & Administration Director: maria@bcnpha.ca
- Carolina Munoz – Human Resources Generalist: carolina@bcnpha.ca

The Association investigates non-compliance with this Policy and with Applicable Privacy Legislation where the Association has reasonable grounds to believe that Personal Information is being inappropriately collected, modified, used, stored or disclosed. Staff who fail to properly maintain the safety and security of Personal Information or who engage in unauthorized

collection, access, use, modification or disclosure of Personal Information may be subject to discipline up to and including termination of their employment or contractual engagement, as applicable.

PRIVACY BREACHES

The Association views any security breach involving Personal Information as a serious matter. In the event of a privacy breach or unauthorized access, use or disclosure of Personal Information, the Association's response will include the following steps:

1. The Association will endeavor to contain the breach as soon as possible and/or stop the unauthorized activities, as applicable;
2. The Association will designate an appropriate individual to lead an initial investigation into the breach and/or unauthorized activities;
3. The Association will notify individuals of any breach of security safeguards involving their Personal Information under the Association's control if such notification is required by Applicable Privacy Legislation; and
4. The Association will keep a record of any breach of security safeguards involving Personal Information under its control.

All Staff are expected to provide their full cooperation with any investigation into unauthorized collection, access, use or disclosure or response to a privacy breach incident.

Staff must immediately report actual or suspected privacy breach incidents to one of the Association's Privacy Officers. If there is any question about whether a privacy breach has occurred or may occur, individuals are directed to immediately consult with one of the Association's Privacy Officers.

ACCURACY AND CORRECTION OF PERSONAL INFORMATION

The Association makes reasonable efforts to ensure that Personal Information is as accurate, complete and current as required for the purposes for which it was collected. In some cases, the

Association relies on Staff and Members to ensure that certain information about them (such as contact information) is current, complete, and accurate. Individuals are expected to inform the Association of any updates to their Personal Information as soon as reasonably possible.

Individuals may, under Applicable Privacy Legislation, challenge the accuracy and completeness of their Personal Information by contacting one of the Association's Privacy Officers. If the Association is satisfied that an individual's request for correction is reasonable, the Association will amend the information as appropriate. If the Association is not satisfied that the request for correction is reasonable, the Association will annotate the information, noting that a correction was requested but not made.

RETENTION

The Association will retain Personal Information for a duration that is reasonably required for operational, administrative, legal, regulatory or statutory purposes. Once Personal Information is no longer required for such purposes, it will be securely destroyed, erased, or made anonymous.

RIGHT OF ACCESS

Staff and Members have the right to request access to their Personal information that the Association maintains within its control in accordance with Applicable Privacy Legislation. This right to access Personal Information is subject to certain legal restrictions, such as:

- where the requested information is privileged;
- where requested records contain the Personal Information of third parties; or
- where the requested records contain the Association's confidential commercial information.

Staff and Members should contact one of the Association's Privacy Officers to request access to their Personal Information. One of the Privacy Officers will assist the individual with the access request and will respond in a manner consistent with Applicable Privacy Legislation. The

Association will take reasonable steps to verify the individual's identity and their right to access the requested information.

OPENNESS

The Association's policies and practices relating to the management of Personal Information are available by:

- BCNPHA Web Page;
- Physical Copy at Head Office Board;
- BCNPHA – General Drive

Questions, concerns or complaints about this Policy or the Association's Personal Information privacy practices should be directed to one of the Association's Privacy Officers:

- Bryan Woo – Managing Director: bryan@bcnpha.ca
- Maria Montero – Finance & Administration Director: maria@bcnpha.ca
- Carolina Munoz – Human Resources Generalist: carolina@bcnpha.ca

CHALLENGING COMPLIANCE

The Association will investigate and respond to any complaints or inquiries relating to its compliance with Applicable Privacy Legislation or this Policy. Complaints or inquiries are to be in writing and forwarded to one of the Association's Privacy Officers. One of the Privacy Officers will make efforts to investigate and respond to any complaints or inquiries within the timeframe required under Applicable Privacy legislation.

Individuals who are not satisfied with the Privacy Officer's response may file a complaint with the British Columbia provincial Privacy Commissioner at: <https://www.oipc.bc.ca/for-the-public/how-do-i-make-a-complaint/>

Individuals may also write to the Office of the Information and Privacy Commissioner of British Columbia as follows:

Office of the Information and Privacy Commissioner for British Columbia

PO Box 9038, Stn. Prov. Govt. Victoria, British Columbia, V8W 9A4

Phone: (250) 387-5629

Fax: (250) 387-1696

Email: info@oipc.bc.ca

Cross Reference:

- Technology Use Policy
- Artificial Intelligence (AI) Driven Tools Policy
- The Association's policies with respect to bullying, harassment and discrimination

CHANGES TO THIS POLICY

The Association reserves the right to make changes to this Policy at any time. Such changes will be effective when posted. Please review this Policy from time to time to become aware of any changes that have been made.

Date: July 30, 2026