

Privacy Policy

Effective date: August 8, 2023

Policy owner: Vice-President, Information & Technology Services

Purpose

The British Columbia Pension Corporation (the “Corporation”) complies with the Freedom of Information and Protection of Privacy Act (“FOIPPA”) with respect to the collection, use, disclosure, retention, and destruction of Personal Information. This policy sets out the privacy principles the Corporation adheres to when providing protection for and access to Personal Information under its custody or control.

Scope

This policy applies to all employees and contractors managing Personal Information on behalf of the Corporation.

Roles and Responsibilities

- **Privacy Officer:** Has been delegated certain powers, duties and functions under FOIPPA by the Chief Executive Officer to oversee privacy compliance.
- **Privacy Office:** Responsible for all privacy operations relating to the management of Personal Information, including privacy breach management and delivery of education and training to support privacy compliance.
- **Information Owners:** Responsible for working with the Privacy Office to ensure Personal Information within the scope of their responsibility is managed in accordance with applicable legislation and policies.
- **Supervisors:** Responsible for ensuring staff complete privacy awareness training, privacy measures are integrated into their activities, and ensuring staff and contractors comply with applicable legislation and policies.
- **Contract Managers:** Responsible for contract relationships to ensure that contractors are aware of and meet the Corporation’s privacy requirements and that the contract contains privacy protective language.
- **All employees and contractors:** Responsible for protecting Personal Information they handle in the course of their work, completing privacy training, notifying the Privacy Office of known or suspected privacy breaches, and complying with applicable legislation and policies.

Policy Statements

The Corporation manages Personal Information in accordance with the following privacy protection principles. Employees and contractors should be aware of and comply with these principles when handling Personal Information.

Accountability

- The Corporation has a privacy management program, including policies and procedures, for the safe and secure handling of all Personal Information under its custody or control.

Purpose for Collection

- The Corporation collects Personal Information that is directly related to and necessary for a business purpose in accordance with section 26(c) of FOIPPA and other applicable legislation and ensures that individuals are informed of the purpose for the collection of their Personal Information.

Managing Notification

- The Corporation will inform individuals when it collects their Personal Information of the purpose and authority for which their Personal Information is collected and used. This notice includes the contact information of the Privacy Office for questions about the collection.
- Under FOIPPA, consent is not generally required for Personal Information to be collected by the Corporation, however, if Personal Information is required for secondary use, consent will be obtained.

Limiting Collection

- The Corporation only collects Personal Information that is necessary to operate a program or activity for a business purpose or as authorized by legislation.
- The amount and type of Personal Information collected is limited to what is necessary to fulfill the purpose for which it was collected.

Limiting Use, Disclosure and Retention

- The Corporation will only use Personal Information for the purposes for which it was identified by the Corporation at the time of collection, or for a consistent use, unless authorized by the individual or applicable legislation.
- The Corporation will disclose Personal Information only to those who have a specific business need for it that is related to the original purpose for collection, unless we have statutory authority to do otherwise.
- The Corporation will retain Personal Information only for as long as needed for that purpose.
- If an individual's Personal Information is used to make a decision about them, the Corporation will retain such Personal Information for at least one year.

Ensure Accuracy

- The Corporation will make reasonable efforts to ensure Personal Information collected is accurate and complete.

Appropriate Safeguards

- The Corporation ensures that reasonable safeguards are in place to protect Personal Information, including technical, physical, and organizational controls to safeguard all Personal Information from unauthorized collection, use, disclosure, and destruction.
- Wherever applicable, only employees and contractors with a “need to know” will have access to Personal Information and only to the minimum amount of Personal Information they require to perform their duties.

Openness

- The Corporation is committed to openness as it relates to the handling of Personal Information and will make readily available to individuals’ specific information about its policies and practices relating to the management of Personal Information.

Right of Access and Correction

- The Corporation has a process in place for handling access to Personal Information requests made under FOIPPA.
- The Corporation has a process that allows for the correction of Personal Information.

Provide Recourse

- The Corporation has established procedures for handling privacy related inquiries or complaints.
- All complaints received are investigated and appropriate measures are taken to correct practices and policies.

Review Schedule

The Corporation will review this policy and all supporting procedures, guidelines, and standards at least every three years.

Other Related Documents

- Freedom of Information and Protection of Privacy Act
- Public Sector Pension Plans Act
- Privacy Breach Response Plan
- Information Management Policy
- Information Security Policy
- Acceptable Use Policy and Guidelines

Definitions

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

Policy owner approval: On behalf of Brett Emmerton	<u>Cristina Stepanov</u> <small>Digitally signed by Cristina Stepanov Date: 2023.07.27 11:01:59 -0700'</small>	Date:	<u>July 27, 2023</u>
CEO approval:	<u>Laura Nashman</u> <small>Digitally signed by Laura Nashman Date: 2023.07.26 12:17:19 -0700'</small>	Date:	<u>July 26, 2023</u>
Date for review: August 8, 2026			