

	POLICY	
	HR-100 Privacy	
	Original Date	Revision Date
	January 08, 2014	January 7, 2025

Policy

RCMSAR shall protect the privacy of individuals who provide personal information to the organization and complies with Canada's *Personal Information Protection and Electronic Documents Act* and other applicable legislation. Further, this privacy policy outlines the principles and practices we will follow in protecting our members' and donors' personal information.

Reason for Policy

RCMSAR is required by law and our values to protect the privacy of our members and those we serve. The privacy policy complies with *Canada's Personal Information Protection and Electronic Documents Act* (PIPEDA) and other applicable legislation.

Definitions

Personal Information – information includes, but is not limited to, information relating to identity, age, address, phone number, e-mail address, date of birth, marital status, income, education, donation history and place of work. Personal information does not include contact information (described below).

Contact information – means information that would enable an individual to be contacted at their home or a place of business and includes name, position name or title, home or business telephone number, home or business address, personal or business email or business fax number. Contact information is not covered by this policy or the **PIPEDA**.

Database – a repository of data organized especially for rapid search and retrieval.

Member – is defined to include all RCMSAR employees and volunteers.

Privacy Officer – means the individual designated responsibility for ensuring that RCMSAR complies with this policy and **PIPEDA**.

Guidelines

1. Collecting Personal Information

- a) Unless the purposes for collecting personal information are obvious and members and donors voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
 - Personal information may be stored on the Search and Rescue Management System (SMS), RCMSAR vessel logbooks, RCMSAR donor database and such other places as required by RCMSAR.
- b) We will only collect member or donor information that is necessary to fulfill the following purposes:
 - To perform operations or for administrative purposes.
 - To verify member or donor identity.
 - To deliver requested training or other services.
 - To guarantee a travel or hotel reservation for members.
 - To identify member and donor communication preferences.
 - To contact our members and donors for fundraising and/or processing donations.
 - To deliver members and donors annual reports, newsletters and other impact reports.
 - To provide member services and donor support.
 - To meet regulatory and legal requirements
- c) Individuals Involved in Search and Rescue Incidents:
 - People involved in search and rescue incidents may be asked for personal information by RCMSAR crews for purpose of recording the particulars of an incident. This may include such persons as, those assisted by RCMSAR, witnesses, persons reporting an incident, a master of vessel in need of assistance, members of other SAR agencies and a master of a vessel of opportunity.
 - Any information collected from an individual involved in a search and rescue incident may only be used by RCMSAR for operations and administrative purposes.
 - This personal information may be stored on the Search and Rescue Management System (SMS), the RCMSAR vessel logbook and such other places as required by RCMSAR.

2. Consent

- a) We will obtain members' and donors' consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- b) Consent can be provided orally, in writing, electronically or through an authorized representative or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the member or donor voluntarily provides personal information for that purpose.

- Express consent refers to a person who has given RCMSAR explicit permission to collect, use and store personal information either verbally or in writing.
 - Implied consent occurs when a member or donor is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, fundraising and the member or donor does not opt-out.
- c) Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), members and donors can withhold or withdraw their consent for the RCMSAR to use their personal information in certain ways. A member's or donor's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist members and donors in making the decision.
- d) We may collect, use or disclose personal information without the member's or donor's knowledge or consent in the following limited circumstances:
- When the collection, use or disclosure of personal information is permitted or required by law.
 - In an emergency that threatens an individual's life, health, or personal security.
 - When the personal information is available from a public source (e.g., a telephone directory).
 - When we require legal advice from a lawyer.
 - To protect ourselves from fraud.
 - To investigate an anticipated breach of an agreement or a contravention of law.
 - When personal information is collected by observation at a performance, a sports meet or a similar event
 - at which the individual voluntarily appears, and
 - that is open to the public
 - When the use is necessary to determine suitability
 - to receive an honour, award or similar benefit, or
 - to be selected for an athletic purpose

3. Using and Disclosing Personal Information

- a) We will only use or disclose members' and donors' personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes.
- b) Personal information may be disclosed to RCMSAR members that need access to the information in the performance of their duties.
- c) We will not use or disclose members' and donors' personal information for any additional purpose unless we obtain consent to do so.
- d) However, there may be cases where RCMSAR is required to disclose personal information to third parties such as the Canadian Coast Guard, medical data captured for Emergency Management Services, insurers, law enforcement or other regulatory entities. In all such cases RCMSAR will provide only the information that is required and shall ensure that the organization requesting the information has a legitimate need and the safeguards required to protect such information are in place.
- e) We will not sell members to donor lists or personal information to other parties unless we have consent to do so.

4. Retaining Personal Information

- a) If we use member and donor personal information to decide that directly affects the member and donor, we will retain that personal information for at least one year so that the member and donor has a reasonable opportunity to request access to it.
- b) Subject to policy 4a) we will retain member and donor personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

5. Ensuring Accuracy of Personal Information

- a) We will make reasonable efforts to ensure that members' and donors' personal information is accurate and complete where it may be used to decide about the members and donors.
- b) Members and donors may request corrections to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.
- c) A request to correct personal information should be forwarded to the Privacy Officer.
- d) If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required 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 members' and donors' correction request in the file.

6. Securing Personal Information

- a) We are committed to ensuring the security of members and donors' personal information to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- b) The following security measures will be followed to ensure that members and donors' personal information is appropriately protected:
 - Access to the Search and Rescue Management System (SMS) or RCMSAR vessel logbooks is assigned to active RCMSAR members or employees only that require a username and password.
 - Access to donor data is restricted to only employees who are responsible for connecting with donors, processing donations and financial reporting.
 - Physical copies of donors' financial information are locked in a filing in cabinet within a locked office accessed by employees responsible for processing donations.
 - A donor's personal information and donation data is regularly backed up on multiple servers housed within Canada and all data is encrypted and sent to the server so that no one can intercept passwords, contact or donation information.
- c) We will use appropriate security measures when destroying member and donor personal information such as shredding documents and deleting electronically stored information when the information is no longer required or at the request of a member or donor.
- d) We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

7. Providing Members and Donors Access to Personal Information

Members and donors have a right to access their personal information, subject to limited exceptions such as whether:

- a) The disclosure could reasonably be expected to threaten the safety or physical or mental health of an individual other than the individual who made the request.
- b) the disclosure can reasonably be expected to cause immediate or grave harm to the safety or to the physical or mental health of the individual who made the request.
- c) the disclosure would reveal personal information about another individual.
- d) the disclosure would reveal the identity of an individual who has provided personal information about another individual and the individual providing the personal information does not consent to disclosure of his or her identity.
 - A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Privacy Officer.
 - Upon request, we will also tell members and donors how we use their personal information and to whom it has been disclosed if applicable.
 - We will make the requested information available within 30 business days or provide written notice of an extension where additional time is required to fulfill the request.
 - If a request is refused in full or in part, we will notify the members and donors in writing, providing the reasons for refusal and the recourse available to the members and donors.

8. Questions and Complaints: The Role of the Privacy Officer or designated individual

- a) The Privacy Officer is responsible for ensuring RCMSAR's compliance with this policy and the *Personal Information Protection Act*.
- b) Members and Donors should direct any complaints, concerns or questions regarding RMSAR's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the members and donors may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Royal Canadian Marine Search and Rescue Privacy Officer:

Manager, Fundraising and Communications
Royal Canadian Marine Search and Rescue
6040 East Sooke Rd
Sooke BC V9Z 0Z7
Phone: 1-800-665-4757


Bill Riggs (Jan 8, 2025 14:25 PST)