

当協会は、BC州の *Personal Information Protection Act (PIPA)* 及び連邦の *Personal Information Protection and Electronic Documents Act (PIPEDA)* に準拠し、会員、生徒、ボランティア、教師、及びその他の個人に関する個人情報のプライバシーを尊重し、適切な管理・保護に努めます。個人情報は、法的な要件や業務遂行上の目的(学校運営)にのみ使用し、第三者への提供は原則として行いません。会員の個人情報の正確性とセキュリティを確保するため、適切な対策を講じます。

個人情報に関するお問い合わせや修正・削除の要求については、理事会までご連絡ください。

board@vjhlss.com



Victoria Japanese Heritage Language School Society Privacy Policy

VJHLS is committed to protecting the privacy and security of personal information held about its members, students, volunteers, teachers, and other individuals. We will ensure compliance with BC's *Personal Information and Privacy Act (PIPA)* and federal *Personal Information Protection and Electronic Documents Act (PIPEDA)*.

We will inform our members of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Privacy Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting members' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our members' personal information and allowing our members to request access to, and correction of, their personal information.

Definitions

Personal Information – means information about an identifiable *individual, including name, age, grade, e-mail address, date of birth, home address, phone number, medical (health/allergy) information, education, and emergency contact information*. Personal information does not include contact information (described below).

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

Privacy Officer – means the individual designated responsibility for ensuring that VJHLSS complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

1.1 Unless the purposes for collecting personal information are obvious and the member voluntarily provides their 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.

1.2 We will only collect personal information that is necessary to fulfill the following purposes:

- To verify identity;
- To communicate with our members including school/class Newsletters;
- To create a Membership list for facilitating a volunteer network to assist with the operation of the school;
- To respond to emergencies;
- To provide educational services;
- To enrol students in a program at the Victoria Japanese Heritage Language School;
- To send out Society membership information;
- To contact our members for fundraising;
- To meet regulatory requirements (e.g. Criminal Records Check);
- To assess suitability for employment or volunteering;
- To collect and process tuition and other fee payments.

Policy 2 – Consent

2.1 We will obtain consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).

2.2 Consent can be provided *orally, in writing, electronically*, or it can be implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the member voluntarily provides personal information for that purpose.

2.3 Consent may also be implied where a member is given notice and a reasonable opportunity to opt-out of their personal information being used for mail-outs, and the member does not opt-out.

2.4 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 can withhold or withdraw their consent for VJHLSS to use their personal information in certain ways. A member's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide services to members or their students. If so, we will explain the situation to assist the member in making the decision.

2.5 We may collect, use or disclose personal information without the member'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;
- For the purposes of collecting a debt;
- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law

Policy 3 – Using and Disclosing Personal Information

3.1 We will only use or disclose personal information where necessary to fulfill the purposes identified at the time of collection

3.2 We will not use or disclose personal information for any additional purpose unless we obtain consent to do so.

3.3 We will not sell membership lists or personal information to other parties.

Policy 4 – Retaining Personal Information

4.1 If we use an individual's personal information to make a decision that directly affects the individual, we will retain that personal information for at least one year so that the said individual has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, we will retain personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

Policy 5 – Ensuring Accuracy of Personal Information

5.1 We will make reasonable efforts to ensure that the personal information retained is accurate and complete where it may be used to make a decision about the individual or disclosed to another organization.

5.2 Members may request correction 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.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of everyone’s personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 We will use appropriate security measures when destroying personal information.
- 6.3 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Members Access to Personal Information

- 7.1 Members have a right to access their personal information, subject to limited exceptions.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. This request should be forwarded to the Board of Directors.
- 7.3 Upon request, we will also tell members how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 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.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the member of the cost and request further direction from the member on whether or not we should proceed with the request.
- 7.6 If a request is refused in full or in part, we will notify the member in writing, providing the reasons for refusal and the recourse available to the member.

Policy 8 – Questions and Complaints: The Role of the Board of Directors

- 8.1 The Board of Directors is responsible for ensuring the Society’s compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Members should direct any complaints, concerns or questions regarding VJHLSS’s compliance in writing to the Board. If the Board is unable to resolve the concern, the member may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for VJHLSS’s Board of Directors:

president@vjhlss.com

補足: その他理事会で保管することが義務付けられている情報について

Appendix I: The Society Records below are required to be kept for ten years. These records should be available for any member to inspect if they wish.

下記の協会に関する情報は10年間の保管が義務付けられています。全会員に閲覧権があります。

- Certificate of Incorporation
- Constitution
- Bylaws
- Statement of Directors and Registered Office
- Orders by any court, tribunal, or federal, provincial or municipal body
- Register of Directors, including contact information
- Written consents to act as director
- Written resignation of directors
- Any disclosures of a director's or senior manager's interest
- Register of Members, organized by class, including contact information
- Minutes of each meeting of members, including text of resolutions passed
- Ordinary resolutions, special resolutions, and consent resolutions, including copies of consents
- Financial Statements and Auditors Reports

CRA Charity Records Official Donation Receipt (2年間), Financial Statements (6年間) 以外は永久保管が義務付けられています。

- **Copies of official donation receipts** (other than for 10-year gifts) - Must be kept for a minimum of two years from the end of the calendar year in which the donations were made.
- **Records for 10-year gifts** - Must be kept for as long as the charity is registered and for a minimum of two years after the date the registration of the charity is revoked.
- **Minutes of meetings of the directors/trustees/executives** – Must be kept for as long as the charity is registered and for a minimum of two years after the date the registration of the charity is revoked or, in the case of a corporation, for two years after the day the corporation is dissolved.
- **Minutes of meetings of the members** - Must be kept for as long as the charity is registered and for a minimum of two years after the date the registration of the charity is revoked.
- **Governing documents and bylaws relating to the charity** - Must be held for as long as the charity is registered and for two years after the date the registration of the charity is revoked.
- **General ledgers or other books of final entry containing summaries of year-to-year transactions and the accounts necessary to verify the entries** - Must be kept for six years from the end of the last tax year to which they relate, while the charity is registered, and for two years after the date the registration of the charity is revoked or, in the case of a corporation, for two years after the day the corporation is dissolved.
- **Financial statements, source documents and copies of annual information returns (T3010 forms)** - Must be kept for six years from the end of the last tax year to which they relate or, if the charity is revoked, for two years after the date of revocation.

Sources:

https://www.priv.gc.ca/en/privacy-topics/business-privacy/safeguards-and-breaches/safeguarding-personal-information/gd_rd_201406/

https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/r_o_p/02_05_d_19/

<https://www2.gov.bc.ca/assets/gov/business/business-management/protecting-personal-information/pipa-guide.pdf>

[https://wiki.clicklaw.bc.ca/index.php?title=Non-Profit Recordkeeping and Privacy \(Societies Act FAQs\)](https://wiki.clicklaw.bc.ca/index.php?title=Non-Profit_Recordkeeping_and_Privacy_(Societies_Act_FAQs))

https://www.canada.ca/content/dam/cra-arc/serv-info/charities/bksndrcrds_en.pdf

<https://www2.gov.bc.ca/gov/content/employment-business/business/managing-a-business/protect-personal-information/develop-policy>