



## **Coastal Community Credit Union's Privacy Code**

### **Accountability**

- 1.1 The credit union is committed to protecting the personal information of its members.
- 1.2 The credit union will designate a Privacy Officer to oversee the protection of personal information and the credit union's compliance with the Privacy Code and the policies and procedures governing personal information.
- 1.3 The credit union will identify the Privacy Officer to its members.
- 1.4 The credit union will develop policies and procedures to:
  - protect personal information;
  - receive and respond to complaints and inquiries;
  - train staff regarding the policies and procedures; and
  - communicate the policies and procedures to members.
- 1.5 The credit union will use contractual or other reasonable means to ensure that a comparable level of personal information protection is implemented by the suppliers and agents who assist in providing services to members.

### **Identifying Purposes**

- 2.1 The credit union shall make reasonable efforts to ensure that a member is aware of the purposes for which personal information is collected when or before the time the information is collected.
- 2.2 The purposes for which the credit union collects personal information are as follows:
  - to contact the member;
  - to identify the member;
  - to determine the eligibility of the member for products and services;
  - to determine the suitability of products or services for the member;
  - to develop, offer and manage products and services that meet member needs;
  - to detect and prevent fraud;
  - to safeguard the financial interests of the credit union;
  - to assess creditworthiness; and
  - to meet regulatory requirements.

## **Consent**

- 3.1 The credit union will obtain the consent of the member for the collection, use, or disclosure of personal information, except in specific circumstances permitted by the governing legislation.
- 3.2 The credit union shall not, as a condition of the supply of a product or service, require a member to consent to the collection, use or disclosure of personal information beyond that required to fulfill explicitly specified and legitimate purposes.
- 3.3 The credit union shall whenever possible obtain a member's express consent to the collection, use and disclosure of personal information. Implied consent may be appropriate in limited circumstances, but the credit union shall take into account the sensitivity of the personal information.
- 3.4 A member can give consent: (a) in writing, such as when completing and signing an application; (b) through inaction, such as not checking a box indicating that they do not wish their names and addresses to be used for optional purposes; (c) orally, such as when information is collected over the telephone or in person; (d) at the time they use a product or service; and (e) through an authorized representative, such as a legal guardian or a person having power of attorney.
- 3.5 A member may withdraw consent at any time, subject to legal or contractual restrictions, provided that: (a) reasonable notice of withdrawal of consent is given to the credit union; (b) the consent does not relate to a credit product requiring the collection and reporting of personal information after credit has been granted; (c) the withdrawal of consent is in writing; and (d) the member understands that the credit union may subsequently not be able to provide the member with related products or services.

## **The Collection of Personal Information**

- 4.1 The collection of personal information shall be limited to that which is necessary for the purposes identified by the credit union.
- 4.2 The credit union shall collect personal information by fair and lawful means.

## **Limiting Use, Disclosure and Retention**

- 5.1 The credit union shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the member or as required by law.
- 5.2 When disclosing personal information the credit union will take all reasonable steps to protect the interests of its members.

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- 5.3 The credit union may share personal information with its subsidiaries and affiliated companies with the consent of the member and as permitted by law.
- 5.4 The credit union will retain personal information only as long as necessary to fulfill the identified purposes or as required by law. Personal information that has been used to make a decision about a member shall be retained long enough to allow the member access to the information after the decision has been made.
- 5.5 Personal information that is no longer required to fulfill the identified purposes should be destroyed, erased or made anonymous.

### **Accuracy**

- 6.1 The credit union will make reasonable efforts to ensure that the personal information it collects, uses and discloses is accurate, complete and up to date.
- 6.2 The credit union will update personal information only as necessary to fulfil the purposes for which the information is collected or as required to service membership privileges or maintain an active account.
- 6.3 The credit union will encourage members to assist in keeping their personal information current. The credit union will inform members how to verify and correct their personal information.
- 6.4 Whenever possible, the credit union will ensure that personal information disclosed to third parties, such as suppliers and agents who assist in providing services to members, is accurate.

### **Safeguards**

- 7.1 The credit union and its directors, officers and employees are committed to safeguarding members' personal information against loss, theft and unauthorized access, use, copying, modification, disclosure and disposal.
- 7.2 The credit union will employ electronic and physical security safeguards appropriate to the sensitivity level of personal information.
- 7.3 The credit union will use various security measures including: physical measures such as locked fire resistant filing cabinets and restricted access to offices; organizational measures such as restricting employee access to files and data centres; electronic measures such as passwords and encryption; and investigative measures such as where the credit union has reasonable grounds to believe that personal information is being inappropriately collected, used or disclosed.
- 7.4 Third parties providing services to the credit union, including cheque printing and data processing, must safeguard personal information disclosed to them in a manner consistent with the policies of the credit union.

- 7.5 The credit union will take due care with the destruction of personal information so as to prevent unauthorized parties from gaining access to the information.

## **Openness**

- 8.1 The credit union will make available to members information about its policies and practices relating to the management of personal information.
- 8.2 The credit union will communicate information to members in a format that is generally understandable. The information made available will include:
- 8.2.1 The title and address of the Privacy Officer;
  - 8.2.2 The means of gaining access to personal information;
  - 8.2.3 A description of the type of personal information held by the credit union;
  - 8.2.4 A copy of brochures and other member information that explain the policies and procedures;
  - 8.2.5 The type of personal information made available to service suppliers and related organizations such as subsidiaries and affiliated companies; and
  - 8.2.6 Advice regarding the process for making inquiries and complaints.

## **Access**

- 9.1 Upon request, the credit union shall inform a member of the existence, use, disclosure and, if possible, the source of personal information about the member held by the credit union and shall allow the member access to the information.
- 9.2 A member may be required to provide sufficient information to permit the credit union to provide an account of the existence, use and disclosure of personal information it holds. The additional information provided shall only be used for this purpose.
- 9.3 The credit union shall respond to a member's request within a reasonable time at a reasonable cost to the member. The information shall be provided in a form that is generally understandable.
- 9.4 If a member demonstrates the inaccuracy or incompleteness of personal information, the credit union shall amend the information as required. If appropriate, the amended information shall be transmitted to third parties with access to the information at issue.
- 9.5 When a challenge regarding the accuracy of personal information is not resolved to the satisfaction of the member, the substance of the unresolved challenge shall be recorded by the credit union. If appropriate, the existence of the unresolved challenge shall be transmitted to third parties with access to the information at issue.

## **Challenging Compliance and Complaints**

- 10.1 Members may direct any inquiries or complaints regarding their personal information to the Privacy Officer.
- 10.2 The credit union will inform members of its complaint procedures, which will be accessible and simple to use.
- 10.3 The credit union will ensure that inquiries, concerns and complaints regarding personal information receive prompt attention and are resolved in a timely manner.
- 10.4 Members will be informed of their right to file a complaint with the Privacy Commissioner and be provided a contact address and telephone number.

Adopted by the Board of Directors of Coastal Community Credit Union on November 25, 2003.