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**PERSONAL INFORMATION  
PROTECTION POLICY: 1**

**POLICY CATEGORY: PERSONAL INFORMATION PROTECTION POLICY**  
**POLICY FOCUS: COLLECTION OF MEMBER DATA/WEBSITE**

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At the Registered Massage Therapist's Association of British Columbia (RMTBC), we are committed to providing our members and website account users with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our members and other website account users we want to assure you that protecting their personal information is one of our highest priorities.

We will inform our members and website account users 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 Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting members' and website account users' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of personal information and allowing our members and website account users to request access to, and correction of, their personal information.

### **Definitions**

**Personal Information** – means information about an identifiable individual such as your name and email address, which are collected for the purpose of creating a website account at [www.rmtbc.ca](http://www.rmtbc.ca). It also includes the personal or professional information that members add to this website in order to create their Find a RMTBC, which is willingly shared by our members for the purpose of making themselves available to the public and other professionals. Find a RMT information is not intended to be used for solicitations by other businesses and should not be used in this way.

**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 the Registered Massage Therapist's Association of British Columbia 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 or website account user 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.

Monitoring Frequency:

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1.2 We will only collect member and website user information that is necessary to fulfill the following purposes:

- To verify identity.
- To complete a financial transaction.
- To identify website user preferences.
- To open and manage a website user account for the purpose of adding Jobs, Events/Courses, or Items for Sale on this website.
- To deliver requested products and services.
- To enrol an individual in an event or course.
- To send out association membership information.
- To ensure a high standard of service to our members and website account users.

## **Policy 2 – Consent**

2.1 We will obtain your 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 or electronically or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the member or website user voluntarily provides personal information for that purpose to complete a transaction on this website.

2.3 Consent may also be implied where a member or website user is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products and the website user 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 and website account users can withhold or withdraw their consent for RMTBC to use their personal information in certain ways. A website account user'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 you in making the decision.

2.5 We may collect, use, or disclose personal information without your 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

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### **Policy 3 – Using and Disclosing Personal Information**

3.1 We will only use or disclose your personal information where necessary to fulfill the purposes identified at the time of collection, or for a purpose reasonably related to those purposes such as:

- To conduct client, customer, member surveys in order to enhance the provision of our services.
- To contact you directly about products and services that may be of interest;]
- To share updated information with the Canadian Massage Therapy Alliance as requested.

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

3.3 We will not sell your personal information gathered through this website to other parties [unless we have consent to do so].

### **Policy 4 – Retaining Personal Information**

4.1 If we use your personal information to inform a decision that directly affects you, we will retain that personal information for at least one year so that you have 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 personal information we gather is accurate and complete where it may be used to inform a decision about website account users or members or disclosed to another organization.

5.2 Members and other website account users 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.

5.3 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.

Monitoring Frequency:

Monitoring Method:

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## **Policy 6 – Securing Personal Information**

6.1 We are committed to ensuring the security of our members and other website account users' personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.

6.2 The following security measures will be followed to ensure that members and website account users' personal information is appropriately protected:

- Access to personal information is provided to employees and authorized sub-contractors only as needed.
- Our website uses an SSL Certificate and accompanying encryption to protect your information.
- Reasonable technical measures to ensure the security of the website are taken.

6.3 We will use appropriate security measures when destroying client's, customer's, member's personal information such as using shredding services for personal information.

6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

6.5 All credit card information is collected and sent to our payment partners for use in payment approval and processing only. RMTBC does not retain your credit card information. RMTBC's payment partner is Bambora. For further information on Bambora's privacy policies, please visit their websites at <https://www.bambora.com/en/ca/privacy-policy/>

## **Policy 7 – Providing Members and Website Account Users with Access to Personal Information**

7.1 Members and other website account users have a right to access their personal information, subject to limited exceptions. Limited exceptions include those found in Section 23 of PIPA

7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.

7.3 Upon request, we will also tell members and other website account users 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 or website account user of the cost and request further direction from you on whether or not we should proceed with the request.

Monitoring Frequency:

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7.6 If a request is refused in full or in part, we will notify you in writing, providing the reasons for refusal and the recourse available to you.

**Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual**

8.1 The Privacy Officer is responsible for ensuring RMTBC's compliance with this policy and the Personal Information Protection Act.

8.2 Members or other website account users should direct any complaints, concerns or questions regarding RMTBC's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the member and other website account users may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for RMTBC's Privacy Officer: [info@rmtbc.ca](mailto:info@rmtbc.ca)

Monitoring Frequency:

Monitoring Method:

Responsibility of: Board