

Privacy Policy

Effective date: October 24, 2018

SafeCare BC Health and Safety Association (also known herein as "us", "we", or "our") operates the www.safecarebc.ca website and the SafeCare BC mobile application (both also referred to herein as the "Service").

At SafeCare BC, we are committed to providing our member sites, members, customers and visitors with exceptional service. Providing this service involves the collection, use and disclosure of some personal information about our member sites, members, customers and visitors. Protecting their personal information is a priority.

This policy informs you of our practices regarding the collection, use and disclosure of Usage Data and Personally Identifiable Information (PII) (e.g. name, e-mail address) when you use our Service and the choices you have associated with that data. We are committed to protecting personal information as detailed in British Columbia's [Personal Information Protection Act \(PIPA\)](#). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how BC businesses and not-for-profit organizations may collect, use and disclose personal information.

This Privacy Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting the personal information of our member sites, members, customers and visitors. Our privacy commitment includes allowing our member sites, members, customers and visitors to request access to, and correction of, their personal information.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy.

1.0 CONSENT

- 1.1 We will obtain member site, member, customer and visitor consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 1.2 Consent can be provided orally, in writing, electronically, 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 site, member, customer or visitor voluntarily provides personal information for that purpose.
- 1.3 Consent may also be implied where a member site, member, customer or visitor is given notice and a reasonable opportunity to opt-out of their personal information being used for mail-outs, the marketing of new services or products.



- 1.4 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), member sites, members, customers or visitors can withhold or withdraw their consent for SafeCare BC to use their personal information in certain ways. A member site's, member's, customer's or visitor's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a service or product. If so, we will explain the situation to assist the member site, member, customer or visitor in making the decision.
- 1.5 We may collect, use or disclose personal information without the member sites', members', customers' or visitors' knowledge or consent in limited circumstances. A full listing of such circumstances can be found in sections 12, 15, and 18 of PIPA. Some examples include:
 - When the collection, use or disclosure of personal information is permitted or required by law
 - 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

2.0 INFORMATION COLLECTION AND USE

- 2.1 Unless the purpose for collecting personal information is obvious and the member site, member, customer or visitor 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.
- 2.2 We collect several different types of information for various purposes to provide and improve our Service. We will only collect member site, member, customer or visitor information that is necessary to fulfill the following purposes:
 - To verify identity
 - To identify member sites', members', customers' and visitors' preferences
 - To enrol in a protected Service feature/program
 - To deliver requested products and services, sometimes through third-party providers or agents
 - To improve service delivery and customization for third-party providers or agents (e.g. cookie data)
 - To process payment through financial institutions
 - To send out Service and Association-related information
 - To contact our member sites, members, customers and visitors
 - To ensure a high standard of service to our member sites, members, customers and visitors
 - To meet regulatory requirements
 - To assess suitability for programs/services

Personally Identifiable Information (PII) Data

- 2.3 While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. This may include, but is not limited to:
 - Email address



SafeCare BC

- First name and last name
- Location
- Cookies and usage data

2.4 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and will contact you if necessary to complete this task. Member sites, members, customers or visitors may request correction to their personal information to ensure its accuracy and completeness. Unless the correction can be made directly on the Service by the user, a request to correct personal information must be made in writing to info@safecarebc.ca with sufficient detail to identify the personal information and the correction being sought.

Usage Data

2.5 We may collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device.

2.6 Usage data may include information such as your computer's Internet Protocol (IP) address, browser type and version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

2.7 When you access the Service by or through a mobile device, this usage data may include information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

Tracking and Cookies Data

2.8 We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

2.9 Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

2.10 We use third party providers who collect cookies to improve service delivery and customize the user experience.

2.11 You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

2.12 Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

3.0 USE AND DISCLOSURE OF DATA

3.1 SafeCare BC uses the collected data for various purposes:



- To provide and maintain the Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide member site, member, customer and visitor care and support
- To provide analysis or valuable information, so that we can improve the Service
- To monitor the usage of the Service
- To detect, prevent and address technical issues

3.2 We will only use or disclose member site, member, customer or visitor 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 member site, member, customer or visitor surveys to enhance the provision of our services
- To contact our member sites, members, customers or visitors directly

3.3 We will not use or disclose member site, member, customer or visitor personal information for any additional purpose, unless we obtain consent to do so. We will not sell client, member site, member, customer or visitor lists or personal information to other parties.

Legal Requirements

3.4 Member sites, members, customers or visitors have a right to access their personal information, subject to limited exceptions. A full listing of the exceptions to access can be found in section 23 of PIPA.

3.5 A request to access personal information must be made in writing and contain sufficient detail to identify the personal information being sought. Upon request, we will also tell member sites, members, customers and visitors how we use their personal information. 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 member site, member, customer or visitor in writing, providing the reasons for refusal and the recourse available to the member site, member, customer or visitor.

3.6 SafeCare BC may disclose your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of SafeCare BC
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of users of the Service or the public
- Protect against legal liability

4.0 TRANSFER OF DATA

4.1 Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your province where data protection laws may differ than those from your jurisdiction.



- 4.2 If you are located outside Canada and choose to provide information to us, please note that we transfer the data, including Personal Data, to Canada and process it there.
- 4.3 Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.
- 4.4 SafeCare BC will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place unless there are adequate controls in place including the security of your data and other personal information.

5.0 SECURITY OF DATA

- 5.1 The security of all data is important to us. We are committed to ensuring the security of member sites', members', customers' and visitors' personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.
- 5.2 No method of transmission over the Internet, or method of electronic storage is guaranteed secure or without risk. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.
- 5.3 All data collected is encrypted and stored on a login-protected database within Canada. Only individuals with permission can access the database.
- 5.4 If credit card information is provided for the purchase of services or items, this information is stored by a third-party processing service for a total of 13 months as required by Visa and Mastercard for auditing purposes. The data is truncated and encrypted. Only a specialized security team can access these records that are stored on secure servers. Once no longer required, the data is erased.
- 5.5 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

6.0 SERVICE PROVIDERS

- 6.1 We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.
- 6.2 These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

- 6.3 We may use third-party Service Providers to monitor and analyze the use of our Service through means such as:

- Firebase and Google Analytics- analytics services provided by Google Inc.



6.4 You may opt-out of certain features through your mobile device settings, such as your device advertising settings or by following the instructions provided by Google in their Privacy Policy: <https://policies.google.com/privacy?hl=en>

6.5 We also encourage you to review Google's policy for safeguarding your data: <https://support.google.com/analytics/answer/6004245>. For more information on what type of information the analytics services collect, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

7.0 LINKS TO OTHER SITES

7.1 Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

7.2 We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

8.0 CHILDREN'S PRIVACY

8.1 Our Service does not address anyone under the age of 18 ("Children").

8.2 We do not knowingly collect Personally Identifiable Information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

9.0 CHANGES TO THIS PRIVACY POLICY

9.1 We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on our webpage (www.safecarebc.ca).

9.2 We will let you know via a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

9.3 You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

CONTACT US

SafeCare BC is responsible for remaining compliant with this policy and with the *Personal Information Protection Act*.

Member sites, members, customers and visitors should direct any complaints, concerns or questions regarding SafeCare BC compliance in writing (info@safecarebc.ca) or by phone (604.630.5572). If SafeCare BC is unable to resolve the concern, the member site, member, customer or visitor may also write to the [Information and Privacy Commissioner of British Columbia](#).