

**Personal Information Protection
Private Sector Privacy Legislation
Personal Information Protection Policy**

**Snowpine Estates KAS 938
Personal Information Protection Policy**

At Snowpine Estates, we are committed to providing our Strata lot owners with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our Strata lot owners, protecting their personal information is one of our highest priorities.

While we have always respected our Strata lot owners' privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our Strata lot owners 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 a Strata lot owner's personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our Strata lot owner's personal information and allowing our Strata lot owners to request access to, and correction of, their personal information.

This Personal Information Protection Policy may be updated as needed.

Scope of this Policy

This Personal Information Protection Policy applies to Snowpine Estates and its subsidiaries.

This policy also applies to any service providers collecting, using or disclosing personal information on behalf of Snowpine Estates.

Definitions

Personal Information – means information about an identifiable individual (lot contact person) including name, home address and phone number. 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 Snowpine Estates complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the Strata lot owner 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.
- 1.2 We will only collect a Strata lot owners information that is necessary to fulfill the following purposes:
 - To verify identity;
 - To identify lot owners preferences;
 - To understand the needs of our Strata lot owners;
 - To deliver requested products and services;
 - To inform on events or emergencies;
 - To send out strata information;
 - To ensure a high standard of service to our Strata lot owners;
 - To meet regulatory requirements;
 - To collect and process Strata fees;
 - To collect debts owed to the strata corporation by an owner.

Policy 2 – Consent

- 2.1 We will obtain a Strata lot owners 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 Strata lot owner voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a Strata lot owner is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs or e-mails and the Strata lot owner 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), Strata lot owners can withhold or withdraw their consent for Snowpine Estates to use their personal information in certain ways. A Strata lot owner'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 the Strata lot owner in making the decision.

2.5 We may collect, use or disclose personal information without the Strata lot owners 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 property 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, a contravention of law or strata bylaw.

Policy 3 – Using and Disclosing Personal Information

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

- To conduct client, customer, member surveys in order to enhance the provision of our services;
- To contact our Strata lot owners directly about products and services that may be of interest;
- To aid Strata lot owners, lawyers and agents in the sale of there properties;

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

3.3 We will not sell a Strata lot owners lists or personal information to other parties.

Policy 4 – Retaining Personal Information

4.1 If we use a Strata lot owners personal information to make a decision that directly affects the Strata lot owner, we will retain that personal information for at least one year so that the Strata lot owner has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, we will retain the Strata lot owners 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 Strata lot owners personal information is accurate and complete where it may be used to make a decision about the Strata lot owners or disclosed to another organization.

5.2 A Strata lot owner 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. If the correction is not made, we will note the Strata lot owners' correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of the Strata lot owners 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 the Strata lot owners personal information is appropriately protected including but not restricted to restricting employee access to personal information as appropriate (i.e., only those that need to know will have access; requiring any service providers to provide comparable security measures].
- 6.3 We will use appropriate security measures when destroying a Strata lot owners personal information such as shredding documents, deleting electronically stored information.
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing To Strata Lot Owners Access to Personal Information

- 7.1 Strata lot owners 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. A request to access personal information should be forwarded to the Privacy Officer or designated individual.
- 7.3 Upon request, we will also tell Strata lot owners 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 Strata lot owner of the cost and request further direction from the Strata lot owner 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 Strata lot owner in writing, providing the reasons for refusal and the recourse available to the Strata lot owner.

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

- 8.1 The Privacy Officer or designated individual is responsible for ensuring Snowpine Estates compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Strata lot owners should direct any complaints, concerns or questions regarding Snowpine Estates compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the Strata lot owner may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Snowpine Estates Privacy Officer or designated individual:

snowpineestates@outlook.com

Note: This document represents the position of Snow Pine Strata and is not to be considered a legally binding document. This document is presented without prejudice.