



Privacy Policy

Lillooet Area Library Association (LALA) respects the right of individuals to the protection of their personal information. Accordingly, LALA complies with the British Columbia Freedom of Information and Protection of Privacy Act (FOIPPA) and the federal Personal Information Protection and Electronic Documents Act (PIPEDA).

LALA's privacy policy adheres to the 10 principles that make up the Canadian Standards Association Model Privacy Code and form the basis of both pieces of legislation cited above. These principles, and LALA's related policies, are set out below.

Definition of Personal Information

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. Personal information does not include the name, title, business address or telephone number of an employee of an organization.

Principle 1 - Accountability

LALA is responsible for personal information under its control and shall designate an individual or individuals who are accountable for LALA's compliance with established privacy principles.

1.1 The name and contact information of the Privacy Officer will be made available to interested individuals through LALA's website, its Privacy Statement or upon inquiry to LALA staff.

1.2 Staff and relevant volunteers shall follow the privacy protection practices established by LALA when collecting, using, disclosing and safeguarding personal information.

1.3 In cases where information has been transferred to a third party for processing or analysis, LALA will ensure that the third party has comparable privacy safeguards in place.

Principle 2 - Identifying Purposes

LALA will identify the purposes for collecting personal information orally, electronically or in writing when or before the information is collected.

2.1 The purposes will be limited to those that are related to our business and which a reasonable person would consider to be appropriate in the circumstances.

2.2 LALA collects personal information for the following reasons:

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- To provide information about services, professional development, research, and resources
- To deliver requested products and services
- To conduct research and collect statistical information

Principle 3 - Consent

The manner in which LALA obtains consent for the collection of personal information varies with the sensitivity of the information being collected. PIPA makes provision for express, implied or deemed consent, depending on the situation.

3.1 In general, the following actions by an individual constitute implied consent for LALA to collect, use and disclose personal information for purposes identified to the individual:

- Registration for programs and services
- Acceptance of employment and benefits enrollment by an employee
- Acceptance of a volunteer position or student placement

3.2 LALA will make a reasonable effort to ensure that individuals are aware of the purposes for which information is collected at the time of collection. Individuals can give consent:

- In writing, such as when completing a form
- Through an opt-out process, either by checking off a box on a response form or by contacting LALA
- Orally, either in person or by telephone

3.3 Individuals may withdraw consent to LALA's use or disclosure of their personal information at any time, by any means, with reasonable notice to LALA.

3.4 LALA may collect, use and disclose personal information without consent if that information is considered by law to be in the public domain. Sources of public information include telephone and professional directories, newspapers, periodicals and public registries.

Principle 4 - Limiting Collection

LALA will limit the collection of personal information to that which is necessary and reasonable for the purposes identified under Principle 2.

4.1 Information will be collected by fair and lawful means.

4.2 When collecting personal information, staff and volunteers will usually collect it directly from the individuals (or legal guardians) about whom the personal information pertains.

4.3 Personal information may be collected from other sources with prior consent from the individual, for example, from prior employers, personal references or from other third parties having the right to disclose the information.

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Principle 5 – Limiting Use, Disclosure and Retention

LALA will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law.

5.1 LALA does not sell, rent or trade mailing lists.

5.2 Personal information will be retained as long as the purpose for which the information was originally collected remains valid.

Principle 6 – Accuracy

LALA will use its best efforts to ensure that information that is used on an ongoing basis, including information that is disclosed to third parties, and information that is used to make a decision about an individual (such as giving recognition) is accurate, complete, and up-to-date.

Principle 7 – Safeguards

LALA will protect personal information by making reasonable security arrangements, appropriate to the sensitivity of the information, against such risks as unauthorized access, collection, use, disclosure and disposal.

7.1 All staff and volunteers with access to information will be required, as a condition of employment or volunteer role, to respect the confidentiality of personal information.

7.2 Third parties are expected to safeguard personal information entrusted to them in a manner consistent with the policies of LALA. Examples of third parties include Sitka, BC Libraries Cooperative and data collection/analysis providers.

Principle 8 – Openness

LALA will make readily available to individuals information about its procedures and practices relating to the collection and management of personal information.

8.1 The information made available will include any or all of the following:

- The name or title and contact information of the Privacy Officer who is accountable for compliance with LALA's policies and procedures, and to whom complaints or inquiries can be forwarded;
- The means of gaining access to personal information held by LALA;
- A description of the types of personal information held by LALA;
- A copy of any document that explains LALA's policies, procedures, standards or codes; and
- The types of information made available to third parties.



Principle 9 – Individual Access

Upon request, LALA will inform an individual of the existence, use and disclosure of his or her personal information and will give the individual access to that information.

9.1 LALA will respond to such a request within a reasonable length of time that is no longer than one month.

9.2 While the response will typically be provided at no cost to the individual, depending on the nature and amount of information involved, a cost may be imposed.

9.3 The requested information will be made available in a form that is generally understandable. For example, where LALA uses abbreviations or codes to record information, an explanation of those codes will be provided.

9.4 For LALA to provide an account of the existence, use and disclosure of personal information, an individual may be asked to provide additional information to aid in the search. The additional information provided will only be used for this purpose.

9.5 Upon request, LALA will provide specific information about third parties to whom personal information has been disclosed.

9.6 When an individual demonstrates the inaccuracy or incompleteness of personal information, LALA will amend the information as required. Where appropriate, the amended information will be transmitted to third parties having access to the information in question.

9.7 LALA may not be able to provide an individual with access to some or all of his or her personal information in certain circumstances permitted by law. Some exceptions include, if doing so would likely reveal personal information about a third party or disclosure could reasonably be expected to threaten the life or security of another individual.

Principle 10 – Challenging Compliance

An individual will be able to challenge LALA's compliance with the above principles to the designated person/s accountable for LALA's compliance.

10.1 The name of the Privacy Officer will be known to staff and information about how to contact that person/s will be made available.

10.2 LALA will maintain procedures to receive and respond to complaints or inquiries about its policies and practices relating to the handling of personal information. The complaint procedures will be easily accessible and simple to use.

10.3 Individuals who make inquiries or lodge complaints will be given information by LALA of the existence of relevant complaint procedures.

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10.4 If a complaint is found to be justified, LALA will take appropriate measures, including revision of the personal information, and, if necessary, amendment of LALA's policies and procedures.

Policy Review

This policy will be reviewed every 3 years, or as required.

How to Contact the Privacy Officer

Inquiries, complaints, or access requests should be addressed to:

Privacy Officer, Lillooet Area Library Association

PO Box 939, 930 Main Street, Lillooet, B.C.

lala@lillooet.bclibrary.ca 250 256-7944