

**Association of Service Providers for
Employability and Career Training
("ASPECT")**

PRIVACY CODE

INTRODUCTION

ASPECT is an association of community-based trainers that represents and promotes the interests and activities of members to strengthen their capacity to provide services to people with barriers to employment.

This Privacy Code sets out our privacy commitment to the protection of personal information of our employees, and personal information obtained through contractual arrangements with service providers and with the Province of British Columbia.

This Privacy Code is intended to assist us to meet our obligations under the *Freedom of Information and Protection of Privacy Act* ("FOI") arising from our contractual agreements with the Province of British Columbia as well as our obligations respecting the personal information of our employees and service providers regarding the new *Personal Information Protection Act* ("PIPA").¹

The Privacy Code is also intended to provide open and transparent principles, policies, practices and procedures by which ASPECT can meet its privacy commitment to the protection of personal information of its employees and for personal information received from our service providers and the Province of British Columbia. It is also intended to set out the choices available for individuals regarding our collection, use or disclosure of their personal information.

The purpose of this Privacy Code is to articulate clearly our privacy practices respecting the management of personal information collected and used by ASPECT and to ensure compliance with the federal and provincial privacy laws. At the same time, it recognizes the needs of ASPECT to collect, use or disclose personal information versus the right of individuals to protect their personal information. The standard for the collection of personal information by ASPECT is one of what a reasonable person would consider appropriate in the circumstances.

¹ This Privacy Code is built on the ten principles of the Canadian Standards Association (CSA) Model Code for the Protection of Personal Information which was published in March 1996 as a National Standard of Canada Federal and these principles are now incorporated in both the federal *Personal Information Protection and Electronic Documents Act* and the British Columbia *Personal Information Protection Act*

DEFINITIONS

The following definitions under *FOI* and *PIPA* are intended to provide clarity regarding the breadth and scope personal information protected by our privacy policies and practices.

FOI Definitions

“personal information” means recorded information about an identifiable individual.

PIPA Definitions

“contact information” means information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual

“employee personal information” means personal information about an individual that is collected, used or disclosed solely for the purposes reasonably required to establish, manage or terminate an employment relationship between the organization and that individual, but does not include personal information that is not about an individual’s employment.

“organization” means a person, an unincorporated association, a trade union, a trust or a not for profit organization, but does not include:

- (a) an individual acting in a personal or domestic capacity or acting as an employee;
- (b) a public body;
- (c) the Provincial Court, the Supreme Court or the Court of Appeal;
- (d) the Nisga’a Government, as defined in the Nisga’a Final Agreement or
- (e) private trust for the benefit of one or more designated individuals who are friends or members of the family of the settlor.

“personal information” means information about an identifiable individual and includes employee personal information but does not include contact information or work product information.

“work product information” means information prepared or collected by an individual or group of individuals as part of the individual’s or group’s responsibilities or activities related to the individual’s or group’s employment or business but does not include personal information about the individual who did not prepare or collect the personal information.

GUIDING PRINCIPLES

The following ten principles are the basis of ASPECT Privacy Code and shall guide ASPECT's management of personal information and its privacy practices together with the statutory requirements of the *FOI* and *PIPA*.

1. **Accountability** – ASPECT is responsible for personal information under its control including personal information not in the custody of ASPECT. ASPECT shall designate one or more individuals to be responsible for ensuring that ASPECT complies with this Privacy Code and shall make the position name or title and contact information of each individual so designated.
2. **Identifying Purposes for Collection of Personal Information** – ASPECT shall identify the purposes for which personal information is collected or before personal information is collected.
3. **Obtaining Consent for Collection, Use or Disclosure of Personal Information** – ASPECT shall ensure that consent is obtained from each individual for the collection, use or disclosure of their personal information unless inappropriate. ASPECT shall recognize and act on any withdrawal of consent by an individual to collect their personal information.
4. **Limiting Collection of Personal Information** – ASPECT shall limit the collection of personal information to the purposes identified by ASPECT and shall only collect personal information using appropriate, fair and lawful means.
5. **Limiting Use, Disclosure and Retention of Personal Information** – ASPECT shall not use or disclose personal information for purposes other than for the purpose it was collected unless ASPECT has the consent of the individual or as provided by law. ASPECT shall retain personal information for only as long as necessary to meet the purposes of the collection of the personal information.
6. **Accuracy of Personal Information** – ASPECT shall ensure that personal information collected, used and disclosed shall be as accurate, complete and up-to date as possible for the purposes for which it has been collected used and disclosed.
7. **Security Safeguards** – ASPECT shall take all appropriate steps to protect the personal information collected, used and disclosed and use security measures appropriate to sensitivity of the personal information.
8. **Openness Concerning Policies and Practices** – ASPECT shall ensure that information is made available to employees and customers regarding this Privacy Code and our privacy practices regarding personal information.

9. Customer and Employee Access to Personal Information – ASPECT shall inform an individual of the collection, use and disclosure of his/her personal information at the individual's request and shall grant access to the individual to such personal information. An individual shall be entitled to challenge the accuracy and completeness of the personal information collected, used or disclosed by ASPECT and have it amended and or corrected as necessary or appropriate.

10. Challenging Compliance - This Privacy Code and our privacy practices shall include a clear process for responding to complaints that may arise with respect to our handling and managing of personal information of customers and employees. A customer or employee may make a complaint regarding ASPECT's compliance with its privacy policies and practices to the designated individual in accordance with our complaint process.

APPLICATION OF THE PRIVACY CODE

1.1 Although ASPECT is not a local public body or a public body listed under *FOI*, under the terms of its contractual agreement(s) with the Province of British Columbia, ASPECT is required to comply with *FOI* with respect to personal information of individuals collected or provided to ASPECT in the course of the provision of services. This means that ASPECT is required to assist the Province of British Columbia to comply with its statutory obligations under *FOI* in accordance with the terms and conditions of its agreement with the Province of British Columbia.

1.2 Where ASPECT is required to collect, use and disclose personal information in accordance with *FOI*, the following specific practices and procedures of this Privacy Code as set out in Schedule A shall apply and shall form part of this Privacy Code.

1.3 ASPECT also meets the definition of organization for the purposes of the *PIPA* and therefore this Privacy Code sets out ASPECT's policies and practices for managing personal information of individuals being collected, used and disclosed from our employees and services providers whether collected, used or disclosed orally, electronically or in writing in compliance with *PIPA*.

1.4 This Privacy Code does not apply to the following prescribed sources of public information:

- (a) an individual's name, address, telephone number and other personal information that appears in a telephone directory or is available through Directory Assistance provided the directory or directory assistance is available to the public and the individual can refuse to have their personal information included the directory or made available by directory assistance;

- (b) an individual's personal information that appears in a professional or business directory, listing or notice available to the public and the individual can refuse to have such personal information included in the directory;
- (c) an individual's personal information appearing in a registry in which the public has access provided such personal information is collected by an appropriate authority in accordance with municipal, provincial or federal laws;
- (d) an individual's personal information appearing in a printed or electronic publication available to the public, such as a magazine, book or newspaper in printed or electronic form.

PRIVACY POLICIES AND PRACTICES

Accountability

2.1 All personal information received from the Province of British Columbia or its service providers arising from its contractual agreement(s) is subject to compliance with the *FOI* provisions of this Privacy Code. Schedule A of the Privacy Code sets out ASPECT's specific practices and procedures regarding personal information that is subject to *FOI*.

2.2 In order to meet its responsibilities for personal information under its possession or control, ASPECT appoints the Projects' Director and or his/her designate to be accountable for ASPECT's compliance with this Privacy Code and its statutory requirements under *PIPA*. The Projects' Director and or his/her designate may appoint one or more persons to act on their behalf with respect to the responsibility for day-to-day management, collection and processing of personal information.

2.3 The contact information of persons designated to be accountable for ASPECT's compliance with the Privacy Code shall be made known upon request.

2.4 ASPECT does not currently provide any other personal information to third parties as set out in *PIPA*. In the event, that ASPECT does provide personal information to third parties, ASPECT shall ensure that such third parties have policies and practices in place that provide similar or comparable protection for personal information as ASPECT.

2.5 ASPECT shall put in place procedures and practices to give effect to this Privacy Code and shall include:

- 2.5.1 Procedures and practices to protect personal information and to oversee compliance with this Privacy Code;
 - 2.5.2 Procedures and practices to receive and respond to requests for personal information, inquiries and complaints under *FOI* and *PIPA*;
 - 2.5.3 Methods and means for training and communicating our privacy procedures and practices to employees; and
 - 2.5.4 Methods and means for communicating our privacy procedures and practices to our service providers and the public.
- 2.6 ASPECT shall continue to update and enhance its privacy policies and practices on an as and when basis.

Purposes of Collection

- 3.1 ASPECT collects, uses and discloses personal information from individuals, members, employees and subcontractors only for the following purposes:
- 3.1.1 To perform its contractual obligations to the Province of British Columbia for the term of the agreement(s) such as keeping records of program participants for meeting reporting requirements;
 - 3.1.2 To meet, maintain, monitor and regulate contractual obligations with subcontractors for the term of such agreement(s) such as paying milestone payments to subcontractors;
 - 3.1.3 To meet terms, conditions and obligations of employment to our employees such as for benefit and payroll administration; and
 - 3.1.4 To promote ASPECT programs to its members and the public.
- 3.2 In using and disclosing personal information as part of its contractual agreement(s) with the Province of British Columbia, such personal information shall only be collected, used and disclosed as necessary for the performance of ASPECT's contractual obligations to the Province of British Columbia in accordance with *FOI* requirements set by the Province of British Columbia.
- 3.3 ASPECT also collects uses and discloses personal information of its employees or services providers but such personal information shall only be collected, used and disclosed for purposes that a reasonable person would consider appropriate in the circumstances and that fulfill the purposes that ASPECT has disclosed to the individual in accordance with *PIPA*.
- 3.4 ASPECT shall identify and specify orally, electronically or in writing to the employee or service provider the purposes for which personal information is collected, used and disclosed at or before the time the personal information is collected.

3.5 Designated persons collecting personal information on behalf of ASPECT shall upon request advise an individual of the purposes for such collection or refer the individual to the Projects' Director and or his/her designate to provide an explanation.

3.6 ASPECT shall not collect, disclose or use personal information for any purpose not identified or specified to an individual without obtaining their consent.

Consent

4.1 Subject to the specific provisions of Schedule A for personal information collected pursuant to *FOI*, 1.4 above and 4.3 below, ASPECT will obtain consent from an individual when collecting, using or disclosing personal information of its individuals, employees, members and subcontractors for the purposes outlined above.

4.2 Consent may be explicit (orally or in writing) or implied. Consent may be implied by ASPECT where at the time consent is deemed as follows:

- 4.2.1 the purpose would be considered obvious to a reasonable person;
- 4.2.2 the individual has voluntarily provided the personal information for that purpose; or
- 4.2.3 ASPECT has given notice of the collection of personal information for a specified period in a form that can be reasonably understood of its intention to collect, use or disclose the personal information and the individual is given a reasonable period of time to decline and does not decline and it is reasonable to collect, use or disclose provided you assess that the sensitivity of the information is such that implied consent will suffice.

4.3 Consent is not required for the following personal information which is permitted to be collected and used from an individual or from a source other than an individual without limitations:

- 4.3.1 is clearly in the interest of the individual and consent cannot be obtained in a timely way;
- 4.3.2 is necessary for medical treatment of the individual and individual is unable to give consent;
- 4.3.3 it is reasonable to expect that the collection or use with the consent of individual would compromise the availability or accuracy of the personal information and the collection is reasonable for an investigation or a proceeding;
- 4.3.4 where collection or use occurs by observation at a performance, a sports meet or a similar event at which individual voluntarily appears and is open to the public;

- 4.3.5 is necessary to determine individual's suitability to receive an honour, award or similar benefit such as honorary degree, scholarship or bursary or selected for an athletic or artistic purpose;
- 4.3.6 organization is credit reporting agency and collection is for a credit report and individual consents at the time the original collection occurs;
- 4.3.7 is required or authorized by law;
- 4.3.8 personal information is necessary to facilitate collection of debt owed or payment of debt to an organization; and
- 4.3.9 collection or use of employee personal information is reasonable for establishing, managing or terminating an employment relationship

4.4 With respect to the disclosure of personal information, ASPECT shall obtain consent from the individual, with the exception of the following personal information which is permitted to be disclosed from an individual or from a source other than an individual without limitations:

- 4.4.1 is clearly in the interest of the individual and consent cannot be obtained in a timely way;
- 4.4.2 is necessary for medical treatment of the individual and individual is unable to give consent;
- 4.4.3 it is reasonable to expect that the disclosure with the consent of individual would compromise the availability or accuracy of the personal information and the collection is reasonable for an investigation or a proceeding;
- 4.4.4 where disclosure occurs by observation at a performance, a sports meet or a similar event at which individual voluntarily appears and is open to the public;
- 4.4.5 is necessary to determine individual's suitability to receive an honour, award or similar benefit such as honorary degree, scholarship or bursary or selected for an athletic or artistic purpose;
- 4.4.6 organization is credit reporting agency and disclosure is for a credit report and individual consents at the time the original collection occurs;
- 4.4.7 is required or authorized by law;
- 4.4.8 personal information is necessary to facilitate collection of debt owed or payment of debt to an organization;
- 4.4.9 personal information is disclosed in accordance with a provision of a treaty that authorizes or requires its disclosure or is made under an enactment of BC or Canada;
- 4.4.10 disclosure is for the purpose of complying with a subpoena, warrant or order issued or made by a court, person or body with jurisdiction to compel the production of personal information;
- 4.4.11 the disclosure is to a public body or a law enforcement agency in Canada, concerning an offence under the laws of Canada or a province, to assist in an investigation, or in the making of a decision to undertake an investigation;

- 4.4.12 there are reasonable grounds to believe that compelling circumstances exist that affect the health and safety of any individual and if notice of disclosure is mailed to the last known address of the individual to whom the personal information relates;
- 4.4.13 the disclosure is for the purpose of contacting next of kin or a friend of an injured, ill or deceased individual;
- 4.4.14 the disclosure is to a lawyer who is representing the organization;
- 4.4.15 the disclosure is to an archival institution if the collection of personal information is reasonable for research or archival purposes; and
- 4.4.16 disclosure of employee personal information is reasonable for establishing, managing or terminating an employment relationship.

4.5 When obtaining consent from an individual, employee or service provider, ASPECT shall use reasonable efforts to ensure that the individual is advised and reasonably understands the purpose for which the personal information is being collected, used or disclosed.

4.6 Wherever possible, ASPECT shall seek consent to collect, use or disclose personal information from an individual, employee or service provider at the time in which the personal information is collected. In the event that this is not possible, ASPECT will seek consent after the personal information is collected but prior to it being used or disclosed for a different purpose that has not been identified or specified.

4.7 When determining whether express or implied consent is required, ASPECT shall take into account the sensitivity of the personal information and the reasonable expectations of the individual, employee or service provider.

4.8 ASPECT will, generally, imply consent to collect, use or disclose personal information for its purposes, where an employee accepts employment or receives benefits.

4.9 When seeking consent for the collection of personal information from an individual, employee or service provider, ASPECT shall set out the choices available to individuals regarding ASPECT' collection, use or disclosure of the personal information at the time of collection or prior to the use or disclosure of such personal information.

4.10 Upon obtaining consent, ASPECT shall record such consent such as via phone, by mail, the Internet, a note to file, copy of an email, copy of a check off box or entry in database field.

Withdrawal of Consent

5.1 ASPECT will honour a request of an individual to withdraw its consent to the collection, use or disclosure of personal information where it receives

reasonable notice and stop collecting, using or disclosing that personal information unless it meets one of the exceptions noted above or would frustrate the performance of a legal obligation or consent was given to a credit reporting agency.

Limiting Collection of Personal Information

6.1 When collecting personal information of an individual, employee, member or subcontractor, ASPECT shall disclose to the individual verbally or in writing, the purposes for the collection of the personal information and shall limit the collection to the identified and specified purposes.

6.2 ASPECT shall only collect personal information by reasonable, fair and lawful means.

6.3 ASPECT, generally, collects personal information from the Province, its employees or service providers although in certain circumstances, ASPECT may collect personal information from third parties, such as credit bureaus, employers or personal references but only from those third parties that represent that they have a right to disclose such personal information.

Limiting Use, Disclosure and Retention of Personal Information

7.1 Other than where ASPECT has consent of the individual or by operation of law, ASPECT shall not use or disclose personal information for purposes other than those identified and specified.

7.2 ASPECT shall only retain personal information of an individual for the period necessary to fulfill the purposes identified and specified, by operation of law or where making a decision regarding employees or subcontractors as long as is reasonable to give individuals, members, employees or subcontractors the opportunity to access the personal information concerning the making of the decision.

7.3 ASPECT shall limit the access of its employees to personal information to those who are participating in the collection, use or disclosure of personal information as part of their duties or to those who have a need to know within ASPECT.

7.4 ASPECT shall maintain the means via reasonable controls, systems and practices whereby personal information that no longer is necessary to retain is destroyed, erased or rendered anonymous.

Accuracy and Security of Personal Information

8.1 ASPECT shall make all reasonable effort to ensure that personal information collected is accurate and complete for the purposes in which it is collected particularly where the personal information is likely going to affect the individual to who the personal information relates or is likely to be disclosed to another organization.

8.2 All personal information used by ASPECT shall be as accurate and complete as possible and where such personal information is being used to make a decision that directly affects an individual, such personal information shall be retained by ASPECT for one year in order to provide a reasonable opportunity for access by the individual.

8.3 ASPECT shall take reasonable security arrangements to prevent the unauthorized access, collection, use, disclosure, copying, modification or disposal of personal information in its custody and control in whatever form it is held. Such security arrangements shall include protection from loss or theft and physical measures, such as locking filing cabinets, restricting access to offices and alarm systems, technological tools, such as passwords, encryption, firewalls and anonymizing software, and organizational tools, such as security clearances, limiting access on a need to know basis, staff training and confidentiality agreements.

8.4 ASPECT shall destroy its documents containing personal information or remove the means by which personal information can be associated with the individual as soon as the purpose for which the personal information was collected is no longer being served by its retention or retention is no longer necessary for legal or business purposes.

8.5 ASPECT shall not use deceptive or coercive means to collect personal information and shall not dispose of personal information with intent to evade a request for access to personal information.

8.6 ASPECT shall protect personal information by ensuring that confidentiality provisions bind both third parties in which personal information is disclosed and employees who have access to personal information.

8.7 ASPECT shall regularly review and update security measures for personal information where applicable.

Access to and Correction of Personal Information

9.1 Where ASPECT has personal information in its control or custody arising from its contractual obligations to the Province of British Columbia, an individual shall have the right to access and correct their personal information in accordance with the provisions of Schedule A.

9.2 Where ASPECT has collected, used or disclosed personal information of an individual that is within the statutory authority of *PIPA*, an individual shall have the right to access and correct their personal information in accordance with the following access and correction procedure:

- 9.2.1 the individual may, in writing, make a request to the Projects' Director of ASPECT or his/her designate concerning his or her personal information under the control of ASPECT;
- 9.2.2 ASPECT shall provide information concerning the ways in which personal information of the individual has been and is being used by ASPECT or has been disclosed by ASPECT;
- 9.2.3 the names of individuals and organizations to whom the personal information has been requested;
- 9.2.4 With the exception of the following personal information, ASPECT will provide access to an individual's personal information:
 - (i) personal information is protected by solicitor-client privilege;
 - (ii) disclosure would reveal confidential commercial information that if disclosed could in the reasonable opinion of a reasonable person harm the competitive position of ASPECT;
 - (iii) personal information was collected where consent is not required for the purposes of an investigation or where proceedings have not been completed;
 - (iv) where personal information was collected by a credit organization 12 months prior to the request from the individual;
 - (v) where the disclosure would threaten the safety, physical or mental health of an individual, cause immediate or grave harm to the safety or physical or mental health of an individual, or would reveal personal information about another individual;
- 9.2.5 having reviewed the personal information requested, the individual may request ASPECT to correct an error or omission in that personal information that is: (i) about the individual and (ii) is under the control of ASPECT;
- 9.2.6 ASPECT shall respond to an individual's request no later than 30 days from the date of an individual's request unless the individual has not given sufficient detail to enable ASPECT to identify the personal information being requested or more time is needed given the large volume of personal information being requested which would unreasonably interfere with ASPECT' operation or there is a need for more time to consult with another organization or public body to determine whether to give access to the requested document. In those circumstances, ASPECT may extend the time an additional 30 days or seek a longer period of time to respond from the privacy commissioner and will advise the individual of the extension in

- time, the time period of the extension and the rights of the individual to complain about the extension;
- 9.2.7 In responding to an individual's request, ASPECT shall advise the individual when access to personal information in whole or in part is being refused, the reasons for the refusal and the contact information of the officer or employee of ASPECT who can answer the individual's questions concerning the refusal;
 - 9.2.8 ASPECT shall make a reasonable effort to assist each applicant to respond accurately and completely as is reasonably possible to their request;
 - 9.2.9 ASPECT shall make the correction as soon as reasonably possible or send the corrected personal information to each organization which the personal information was disclosed during the year prior to the date the correction was made, where ASPECT is satisfied that there are reasonable grounds for the request;
 - 9.2.10 Where ASPECT does not make a correction it shall annotate the personal information under its control that a request was made but the request was not implemented.

Challenging Compliance

10.1 With the exception of the application of Schedule A to personal information that is subject to *FOI*, ASPECT shall maintain a process for addressing and responding to complaints or inquiries regarding its compliance with this Privacy Code including where appropriate a process for seeking external advice prior to responding to individual complaints or inquiries.

10.2 An individual, employee, member or subcontractor may make a complaint or inquiry regarding ASPECT's compliance with this Privacy Code as follows:

- 10.2.1 An individual shall file a written complaint or inquiry to the Projects' Director of ASPECT and or his/her designate outlining the failure of ASPECT to comply with this Privacy Code and the specified section and or principle.
- 10.2.2 ASPECT shall investigate all written complaints or inquiries regarding its compliance with this Privacy Code.
- 10.2.3 Where an investigation determines that a complaint is justified or action is required regarding an inquiry, ASPECT shall take all appropriate steps to resolve the complaint or take appropriate action to address the inquiry including where applicable amending the policies, practices and procedures of this Privacy Code.
- 10.2.4 Wherever possible, ASPECT shall respond to a written complaint within 30 days provided the written complaint or inquiry provides sufficient information to respond to. This response shall include

details regarding the outcome of the investigation and individual's complaint or inquiry.

10.2.5 In the event that ASPECT seeks external advice, the period to respond may be extended for a reasonable period necessary to obtain such external advice.

10.3 In the event that an individual is not satisfied with handling of its complaint by ASPECT, the individual may seek the assistance of the BC Privacy Commissioner. The contact information for the Privacy Commissioner may be found at: www.mser.gov.bc.ca/foi_pop/

Transparency of Privacy Policies, Practices and Procedures

11.1 ASPECT shall make its privacy policies, practices and procedures available on its website and readily available to individuals in person, in writing, by telephone or as applicable in ASPECT publications.

11.2 ASPECT shall also make its policies, practices and procedures understandable for its individuals, members, employees, subcontractors and the public by identifying who within ASPECT is responsible for compliance with this Privacy Code, how personal information can be accessed by individuals, what personal information is held by ASPECT and how it is used.

The contact information for the Project Director of ASPECT is as follows:

Sandra Glass, Project Director
sglass@aspect.bc.ca
(250) 382-9675

Current contact information can also be found on ASPECT's website at www.aspect.bc.ca.

For further information on ASPECT' Privacy Code, practices and procedures, contact (*Sandra Glass*) (250) 382-9675. To review the *BC Freedom of Information and Protection of Privacy Act* and *Personal Information Protection Act*, access to the Act can be found at www.mser.gov.bc.ca/foi_pop/

SCHEDULE A – SPECIFIC PRACTICES AND PROCEDURES UNDER *FOI*

ASPECT, as a contractor for the Province of British Columbia has a contractual obligation to comply with the provisions of the *Freedom of Information and Protection of Privacy Act* (“*FOI*”) when collecting, using or disclosing personal information in accordance with the terms of its agreement(s) with the Province of British Columbia.

In order to comply with these requirements, ASPECT has incorporated the following specific practices and procedures as part of its Privacy Code and shall adhere to these specific practices and procedures when collecting, using and disclosing personal information as a result of the performance of their contractual obligations to the Province of British Columbia:

Collection of Persona Information

1. Unless otherwise specified or directed in writing by the Province of British Columbia, ASPECT shall only collect, use or disclose personal information of individuals that is necessary to perform their obligations or exercise their rights under the agreement(s) with the Province of British Columbia.
2. Unless otherwise specified or directed in writing by the Province of British Columbia, ASPECT shall collect personal information directly from the individual.
3. Unless otherwise specified or directed in writing by the Province of British Columbia, when collecting personal information from an individual pursuant to their contractual obligations with the Province of British Columbia, ASPECT shall advise the individual of the purpose of collection, the legal authority for collecting it and the title, business address, and business telephone of the person designated by the Province of British Columbia to answer questions regarding ASPECT’s collection of the individual’s personal information.

Accuracy of Personal Information

4. ASPECT shall make every reasonable effort to ensure the accuracy and completeness of any personal information used by ASPECT in the performance of their contractual obligations with the Province of British Columbia to make a decision that directly affects the individual that the personal information is about.

Access to Personal Information

5. Unless the agreement(s) with the Province expressly provides otherwise, in the event that ASPECT receives a request for access to personal information from a individual other than the Province of British Columbia, ASPECT shall promptly advise the individual to make the request to the Province and where the

Province has provided the appropriate title and contact information the official responsible for handling such requests, ASPECT shall also provide such contact information to the individual.

Correction of Personal Information

6. Upon receiving written direction from the Province, ASPECT shall correct or annotate the personal information of an individual in accordance with the written direction within 5 business days of receiving the direction.

7. Upon receiving written direction from the Province to correct and annotate personal information, within one year after correcting or annotating such personal information, ASPECT shall provide the corrected or annotated information to any party to whom ASPECT disclosed the personal information that was corrected or annotated.

8. In the event that ASPECT receives a request for correction of personal information from a individual other than the Province of British Columbia, ASPECT shall promptly advise the individual to make the request to the Province and where the Province has provided the appropriate title and contact information the official responsible for handling such requests, ASPECT shall also provide such contact information to the individual.

Protection of Personal Information

9. ASPECT shall protect personal information collected, used and disclosed as a result of their contractual obligations with the Province of British Columbia by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

Retention of Personal Information

10. ASPECT shall retain personal information collected, used and disclosed as a result of their contractual obligations with the Province of British Columbia until directed in writing by the Province of British Columbia to dispose of it or deliver it as specified in writing by the Province of British Columbia.

Use of Personal Information

11. ASPECT shall only use collected, used and disclosed as a result of their contractual obligations with the Province of British Columbia for the performance of its obligations or exercise of its rights under its agreement(s) with the Province of British Columbia.

Disclosure of Personal Information

12. Unless otherwise directed in writing by the Province of British Columbia, ASPECT may only disclose personal information of individuals collected as a result of their contractual obligations with the Province of British Columbia to any other person other than the Province if the disclosure is for the performance of its obligations or exercise of its rights in accordance with its agreement(s) with the Province of British Columbia.

Inspection of Personal Information

13. ASPECT shall, at any reasonable time and on reasonable notice from the Province of British Columbia, allow entry to its premises and reasonable assistance for the purposes of inspection by the Province of British Columbia of any personal information in the possession of ASPECT or any of ASPECT's information management policies or practices relevant to its management of personal information or compliance with *FOI*.