

### Date

The following was approved by the **Chief Administrative Officer (CAO)** on **May 30, 2018**.

### Purpose

The intent of this policy is to ensure personal information collected from the Insurance Corporation of British Columbia ("ICBC") by District of Lake Country ("District") staff is:

- only obtained in accordance with the Access to Information Agreement between the District and ICBC (the "Agreement");
- only obtained as necessary for completing assigned tasks;
- is treated with appropriate care and discretion; and
- is destroyed in accordance with District of Lake Country Records Retention and Disposal Bylaw 627, 2007.

### Policy

This policy has been developed in accordance with British Columbia's *Freedom of Information and Protection of Privacy Act* ("FOIPPA"), which sets out rules for how public bodies can collect, use and disclose personal information. Personal information is defined as recorded information about an identifiable individual other than business contact information. Personal information includes licensing information or registration numbers for vehicles.

### Types of Personal Information Collected

District staff may collect the following information from ICBC using vehicle licence plate numbers:

- Licensing information (plate, registration number, relevant dates);
- Current vehicle description (VIN, year, make, model, colour, body style); and
- Registered owner information (name and address).

The types of information listed above may only be collected from ICBC to allow the District to collect a debt or fine owing to the District, or to assist in District bylaw enforcement proceedings.

### Use of Personal Information

If a vehicle is found to be in contravention of a District bylaw, plate information is used to obtain the vehicle owner's contact information from ICBC in accordance with the Agreement so they may be contacted by the District.

District staff may only use personal information as necessary to fulfill District duties as outlined under "Types of Personal Information Collected" above. This information will not be used for any other reason unless consent has been obtained from the impacted individual in accordance with FOIPPA.

### Disclosure of Personal Information

Personal information collected by District staff will only be disclosed to District staff and Council on a "need to know" basis and to those whose duties require such access. Personal information collected pursuant to the Agreement will not be disclosed to individuals, the public, or agencies external to the District unless:

- the impacted individual consents to this disclosure in accordance with FOIPPA;
- the disclosure is authorized by FOIPPA;
- or as required by law.

### **Security of Personal Information**

In accordance with FOIPPA, the District will make reasonable security arrangements to protect personal information under its custody and control against risks such as unauthorized access, collection, use, disclosure or disposal.

Examples of current security arrangements employed by the District include:

- All physical documentation containing personal information for active files is retained in a secure location.
- Personal information in electronic format consists only of the licence plate number and is retained within a server folder that only authorized District employees can access.
- Information collected for billing or payment purposes will be retained within finance filing and be destroyed in accordance with Records Retention and Disposal Bylaw 627, 2007.
- Personal information collected pursuant to the Agreement will not be stored, disclosed or accessible outside Canada.
- Any employee of the District who knows there has been an unauthorized disclosure of personal information that is in the custody or under the control of the District must immediately notify the designated Freedom of Information head of the District.

### **Retention and Disposal**

In accordance with District Records Retention and Disposal Bylaw 627, 2007, receipts and related information are retained for six years. Upon completion of the retention period, the documentation and information will be destroyed.

In accordance with FOIPPA, personal information collected pursuant to the Agreement will be retained for at least one year after being used so that the affected individual has a reasonable opportunity to obtain access to that personal information. Otherwise, personal information will not be retained longer than required to ensure compliance with District bylaws and obtain payment on District debts.

### **Correction of Personal Information**

Information collected by the District may be corrected either upon written request of the individual or through updated ICBC records. Should the individual request an update directly, the District will verify the information with ICBC before making any changes.

### **Privacy Complaints**

Should an individual lodge a complaint regarding a breach of their privacy with respect to the District's collection of personal information pursuant to the Agreement, District staff will work with the complainant to try to resolve the issue. District staff will respond to complaints in a timely fashion and if a complaint cannot be resolved, the District will refer the complainant to ICBC or the Office of the Information and Privacy Commissioner of British Columbia (OIPC).

This policy is to be reviewed on a periodic basis, and in any event shall be reviewed no later than three years from the date of this policy.

  
Alberto De Feo, Chief Administrative Officer

29 MAY 2018  
Date