



MEMBER PRIVACY POLICY

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First Credit Union is committed to protecting and securing the personal information entrusted to us by our members. We take great care in managing your personal information. Our priority is to comply with all the relevant privacy laws that apply to our business, and to strive for privacy best practices in all aspects of our product and service offerings.

This privacy policy stands as a reflection of our commitment to privacy. For a more information, please contact First Credit Union's Privacy Officer.

1. Accountability

First Credit Union is responsible for personal information under its control. Toward that end, it has established internal procedures to comply with this policy and has designated a Privacy Officer to oversee compliance with the principles of privacy.

Ultimate responsibility for ensuring compliance with the provisions inherent in this policy rests with the Board of Directors of First Credit Union. The Board delegates oversight of the day-to-day management of privacy to the Credit Union's Privacy Officer. The Privacy Officer takes steps to ensure that: sound policies and procedures are in place and reviewed annually; staff are trained on their privacy responsibilities; and third parties adequately safeguard any personal information shared with them.

2. Identifying Purposes for Collection of Personal Information

First Credit Union identifies the purposes for which personal information is collected at or before the time the information is collected. If your personal information will be used for additional purposes not previously identified and not permitted or required by law, you will first be informed of such purposes and asked for your consent to such uses.

Our primary purpose for collecting personal information is to deliver appropriate products and services to our members. Detailed examples of the purposes for which First Credit Union collects personal information are outlined in the First Credit Union Privacy Code.

3. Obtaining Consent for Collection, Use or Disclosure of Personal Information

Your knowledge and consent is required for the collection, use or disclosure of personal information, unless a legal exception to consent exists. In determining the appropriate form of consent, First Credit Union shall take into account the sensitivity of the personal information and the reasonable expectations of its members.

You may withdraw consent at any time, subject to legal or contractual restrictions and your reasonable notice. The Credit Union will inform you of the implications of withdrawing consent.

4. Limiting Collection of Personal Information

First Credit Union limits the collection of your personal information to that which is necessary for purposes identified.

First Credit Union collects your personal information directly from you and may also collect your personal information from other sources, with your consent or where permitted or required by law, including but not limited to employers, personal references or credit agencies.

5. Limiting Use, Disclosure and Retention of Personal Information

First Credit Union does not use or disclose your personal information for purposes other than those for which it is collected, except with your consent or as required by law. For example, First Credit Union may disclose limited personal information to select organizations such as the Credit Union Office for Crime Prevention and Investigation, or a government agency that has made a legitimate demand or request for information.

First Credit Union retains personal information only as long as it is deemed necessary, as set out in First Credit Union's record retention policies, to fulfil the identified purposes for which the information was collected.

Personal information no longer necessary or relevant for the identified purposes, or no longer required to be retained by law, is securely destroyed, erased or made anonymous. First Credit Union maintains reasonable and systematic controls, schedules and practices for such information, its retention and destruction.

6. Accuracy of Personal Information

First Credit Union makes reasonable efforts to keep your personal information as accurate, complete and up-to-date as is necessary to fulfil the purposes for which the information is to be used. However, the Credit Union relies upon its members to ensure accuracy of the personal information provided to it.

7. Security Safeguards

First Credit Union protects personal information with security safeguards appropriate to the sensitivity of the information. With the use of appropriate physical, organizational and technical security measures, the Credit Union protects personal information against a variety of risks, such as, loss, theft, unauthorized access, disclosure, copying, use, modification or destruction of such information.

First Credit Union's security safeguards are set out in employee procedures, IT security policies and other relevant internal documents. The safeguards in place are reviewed regularly to ensure that the risks introduced by new security threats are minimized.

8. Openness Concerning Policies and Practices

First Credit Union makes readily available specific information about its privacy policies and practices to its members and the public upon request.

This information includes: the name, title and address of the Privacy Officer to whom inquiries or complaints can be forwarded; the means of gaining access to personal information held by First Credit Union; a description of the type of personal information held by the Credit Union, including a general account of its uses; a copy of any brochures or other information that explains First Credit Union's policies or information handling practices; and the types of personal information made available to related organizations such as subsidiaries or other suppliers of services.

9. Member Access to Personal Information

If you make a request for access to your personal information, First Credit Union will inform you of the existence, use and disclosure of such information, and provide you with access to that information. You will be given the opportunity to challenge the accuracy and completeness of your information and have it amended as appropriate.

In order to safeguard personal information, you will be required to provide sufficient identification information in order for First Credit Union to authorize access to your file.

First Credit Union shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, First Credit Union shall transmit to third parties having access to the personal information in question, any amended information or information regarding the existence of any unresolved differences.

Members can seek access to their individual files by contacting their account manager at First Credit Union or by contacting the Privacy Officer as described below.

10. Challenging Compliance

If you are concerned that First Credit Union is not complying with the principles set out in this policy, please contact the organization's Privacy Officer. First Credit Union maintains procedures for addressing and responding to all inquiries and complaints by members with regards to the Credit Union's handling of personal information.

For more information, please contact:

Privacy Officer
First Credit Union 4721 Joyce Ave,
Powell River, BC V8A 3B5
Privacy.officer@firstcu.ca

Definitions**Privacy Officer:**

The person within First Credit Union (“FCU”) who is responsible for ensuring compliance with privacy obligations, including this policy, with respect to the collection, use, disclosure and handling of personal information by First Credit Union, its employees, contractors, officers and authorized agents (“representatives”).

Collection:

The act of gathering, acquiring, recording or obtaining personal information from any source, by any means.

Consent:

Voluntary agreement to the collection, use and disclosure of personal information for defined purposes. Consent can be expressed or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing but is always unequivocal and does not require any inference on the part of First Credit Union. Implied consent can be reasonably inferred from an individual’s action or inaction.

Disclosure:

The act of making personal information available to others outside First Credit Union, including related organizations.

Personal Information:

Information about an identifiable individual that is recorded in any form, not including the individual’s name, business title, business address or business phone number. Personal information does not include aggregate information that cannot be associated with a specific individual.

Retention:

Refers to the act of keeping personal information as long as is necessary to fulfil the stated purposes, or as long as otherwise specified by law.

Third Party:

Any individual or organization aside from First Credit Union, its representatives and its members.

Use:

Refers to the treatment, handling and management of personal information by First Credit Union.