

GRANVILLE GARDENS HOUSING CO-OPERATIVE VIDEO SURVEILLANCE PRIVACY POLICY

Granville Gardens is committed to the protection of personal information (video surveillance). This Policy outlines the Co-op's commitment to maintain privacy when collecting, using and disclosing video surveillance of Co-op Members, residents, guests and the general public in the vicinity of the two garbage areas and mailbox area.

*This Policy was developed in compliance with the British Columbia **Personal Information Privacy Act** ('PIPA').*

1. PURPOSE OF VIDEO SURVEILLANCE

The Co-op uses video surveillance for the following purposes:

1. To identify Members, residents, guests or the general public inappropriately dumping garbage, goods and household items in and around the garbage & recycling areas, and not picking up their pet's waste.
2. To monitor the main entrance to the co-op.
4. To enforce Policies.
5. Such other reasons as a reasonable person would consider appropriate in the circumstances.

2. USE OF PERSONAL INFORMATION

'Personal information (video surveillance)' is information that allows an individual to be identified but **does not** include:

1. Members, residents, guests and general public names or information which would enable us to contact Members, residents, guests or general public at their place of employment including their name, position, name or title, business telephone number, business address, business email and business fax number;
2. Personal information about Members, residents, guests and general public that is publicly available information such as information available from a public registry or contained in a telephone book;
3. Aggregated information that cannot be associated with a specific individual; and
4. Information that is not about a person but is about a company, association or another organization.

3. LIMITING COLLECTION, USE AND DISCLOSURE

1. Images of Members, residents, guests, and the general public on the Co-op's video surveillance system (discussed in section 1) will be used in conjunction with information the Co-op already has on file.
2. The Co-op will limit the collection of personal information to that which is reasonably necessary for the purposes identified.
3. The Co-op will not use or disclose personal information (video surveillance) for any purpose other than those for which it was collected (as identified in section 1 of this Policy). Where an additional

use or disclosure is necessary, the Co-op will notify the Member, resident or guest prior to or at the time of the additional use or disclosure, unless such notice is not required or permitted by law.

4. CONSENT

1. The Co-op only collects personal information where it is necessary to provide security and enforcement of policies that the Co-op has agreed to provide.
2. The Co-op reserves the right to collect, use or disclose personal information in certain limited circumstances, without the Members', residents' or guests' knowledge, where required or permitted by law. Examples of this include:
 - a) Where it is clearly in the Member's, resident's or guest's interest and consent cannot be obtained in a timely way;
 - b) Where it is required, by law, to be disclosed to law enforcement and other government agencies;
 - c) Where it is reasonable to expect that disclosure with consent would comprise an investigation or proceeding;
 - d) Where disclosure is for the purpose of complying with a subpoena, warrant or order issued or made by a Court; and
 - e) Where disclosure is required or authorized by law.

5. VIDEO SURVEILLANCE

1. The Co-op may collect personal information of Members, residents, guests, and the general public via the Co-op's video surveillance system. The video surveillance is used for the purposes of enforcing policy, health & safety, security, and protection of Co-op property.
2. The Co-op's video surveillance system will not be used in areas where people have a reasonable expectation of privacy; this includes a unit's front and rear entrance and yard.
3. Video surveillance is overt and captures images, not audio. Video surveillance will be in effect 24 hours per day, 7 days per week. The video surveillance will be reviewed in response to a triggering event, e.g. it is brought to the attention of the Board of Directors or appropriate Committee that a person has disposed of items in a manner that contravenes the Co-op's rules, policies and occupancy agreement. Only then will the video surveillance be reviewed.
4. Where a triggering event requires the Co-op to review video surveillance, the Co-op may use information collected through video surveillance to enforce current policies.
5. The Board will appoint two Directors, both of whom must be present, to review surveillance video and report their findings to the rest of the Board without using the Member's, resident's or guest's name. A course of action will be determined by Policy.
6. Video images will not be disclosed to third parties unless such disclosure is required for the purposes of conducting an investigation, for law enforcement purposes or as authorized by privacy or other legislation.

6. RETENTION

1. Personal information (video surveillance) will be retained only as long as necessary or as required by law or prudent business practice.
2. Video images will be erased within 90 days of the date of the recording in a method that is safe and secure, unless the video image is associated with a specific incident being investigated. If the video image is associated with an incident being investigated or necessary for prosecution, it will be retained for as long as reasonably necessary in the circumstances of the specific incident in issue.
3. The Co-op will take all reasonable efforts to ensure the video images that are erased cannot be retrieved or reconstructed.

7. PROTECTION OF PERSONAL INFORMATION

1. Personal information (video surveillance) will be safeguarded through appropriate measures, including the following as appropriate:

- a) Physical measures such as a locked office.
 - b) Organizational measures such as restricted access to personal information (video surveillance) to designated individuals on a 'need to know' basis.
 - c) Computer security measures such as encryption and/or password protection.
2. Video surveillance files will be kept secure in an area to ensure that information on files is protected from unauthorized access, collection, use, disclosure, copying, modification and disposal. Only duly authorized individuals, who need to have access to information in order to perform their duties, will have access to information.
3. When disclosing recordings to individuals who appear in them, the Board will ensure that identifying information about any other individuals on the recording is not revealed. The Board will take steps to mask identity through technological or other reasonable means available to them.

8. ACCESS

1. The Co-op will inform a Member, resident, guest or the general public of the existence, use and disclosure of their own personal information (video surveillance), and will be given access to that information, to the extent permissible by law.
2. Individuals have the right to request access to their personal information by submitting a written request to the Board of Directors.

9. ACCOUNTABILITY

1. The Co-op is responsible for protecting any personal information (video surveillance) under its control and has assigned its Board of Directors this task.
2. Questions or concerns regarding privacy procedures or the Co-op's compliance with applicable privacy legislation may be directed to the Board of Directors.
3. If the Security Committee becomes aware of an inadvertent and/or unauthorized disclosure of personal information (video surveillance), they will immediately notify the Board of Directors. The Co-op will take all reasonable steps to investigate the unauthorized disclosure. A breach of this Policy will be dealt with in accordance with applicable provisions of PIPA and the Co-op's Rules and Regulations.
4. Upon confirmation of a privacy breach, the Co-op may notify the Office of Information and Privacy Commissioner of BC and work constructively with the OIPC staff to mitigate the extent of the privacy breach.

10. REVIEW OF VIDEO SURVEILLANCE PRIVACY POLICY

1. This Policy shall be reviewed every 2 (two) years by the Board of Directors to ensure there are no other means to satisfy the purposes of the Policy other than video surveillance.