

Digital Privacy Policy

1.0 Purpose

This Policy applies to the collection, use, and disclosure of personal information by the Canadian Union of Public Employees (“CUPE”) in the province of British Columbia. This Policy has been developed in compliance with the British Columbia Personal Information Protection Act (“PIPA”). PIPA sets out rules for how organizations such as ours can collect, use, and disclose personal information.

2.0 Policy Statement

CUPE is committed to being accountable for how our organization treats personal information. We recognize that the proper handling of personal information is both essential to the individuals concerned and to our reputation as an organization. It is our intention to protect the privacy of individuals and members, who share information with us, and to be as open to suggestion, complaint, and inquiry as we can.

CUPE will make reasonable efforts to inform the public, its members, and its employees of this Policy and any subsequent policy with respect to personal information under PIPA. To that end, a copy of the current Policy will be available on request at the CUPE British Columbia Regional Office.

3.0 Scope

This Policy applies to digital engagement by CUPE in the BC Region, including participation by CUPE BC Division and CUPE Locals in relation to resources provided by CUPE.

4.0 Definitions

“Member” means an individual who is a member of the Canadian Union of Public Employees in accordance with its constitution.

“Individual” means a person who has provided personal information to CUPE and may or may not include members or supporters of campaigns and initiatives.

“Personal information” includes but is not limited to identifiable information about an individual such as name, home address, phone number, or personal email address. It may also include demographic data such as age, gender, race, and family status. Demographic data would only be collected and/or reported in aggregate and will never be combined with contact information.

“Confidential union information” includes but is not limited to financial information and reports, membership information, campaigns and government relations plans and strategies.

5.0 Why We Collect and Use Personal Information

We will communicate the purposes for which personal information is collected, either orally, electronically or in writing, before or at the time of collection. We collect individual or member information that is reasonably necessary to fulfill the following purposes:

- To create and maintain a list of members and to contact members as is reasonably necessary;
- To communicate with and engage members in the activities of their union; such as events, training opportunities, political action, coalition building, advocacy, campaigns, and community engagement;
- To confirm membership status, identify communication preferences, and communicate union information to members;
- To communicate with and engage individuals in campaigns and government relations activities, including in-person, by mail, telephone and email, and online;
- To coordinate public activities of the union, including events, rallies, picket lines, meetings, and other gatherings;
- To encourage solidarity support of other labour and progressive organizations; and
- To conduct or commission polling, focus groups, surveys and other information-gathering activities reasonably related to collective bargaining, policy research, campaigns and government relations activities.

6.0 Limits on Collection, Use, and Disclosure

Personal information will be collected and used where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to the purposes identified in this policy. Personal information will not be sold or disclosed to third-party organizations. Individuals may withdraw consent to the collection, use or disclosure of their personal information at any time upon giving reasonable notice.

Demographic information will only be reported in aggregate and will never be combined with contact information.

7.0 Obtaining Consent to Collect, Use, and Disclose Personal Information

Where it is necessary to obtain individual consent, consent can be provided in writing, electronically, through an authorized representative, or it can be implied where the purpose for collecting, using, or disclosing the personal information is considered obvious

and the individual or member voluntarily provides personal information for that obvious purpose.

Consent may also be implied where an individual is given notice and a reasonable opportunity to opt-out or unsubscribe, and they do not exercise that opportunity. Please see Section 6.0 Limits on Collection, Use, and Disclosure for withdrawal of consent.

8.0 Retention of Personal Information

Personal information will be retained for as long as necessary to fulfil the identified purposes. Personal information will be securely destroyed, deleted or anonymized when no longer necessary to retain.

9.0 Keeping Personal Information Secure

CUPE is committed to ensuring that information under our custody or control is protected against risks such as unauthorized access, collection, use, disclosure, copying, modification or disposal. CUPE ensures appropriate security arrangements are in place to protect your personal information from these risks, including physical, technological and operational security measures.

10.0 Ensuring Accuracy of Personal Information

CUPE will make reasonable efforts to ensure that personal information is accurate and complete. Ultimate responsibility for ensuring personal information is accurate falls to the individual, who may provide or update information themselves when filling in online forms or write to the Privacy Officer below to request manual corrections.

11.0 Accessing Your Personal Information

Individuals and members have the right to access their personal information under the control of CUPE, subject to limited exception; for example, in anonymized surveys, data collection may not allow for the isolation of a given individual's response. CUPE will make an effort to assist and respond to each applicant as accurately and completely as reasonably possible.

A request for access to personal information must be made in writing and provide sufficient detail to identify the personal information being sought. CUPE may require individuals to prove their identity before giving them access to their personal information. Upon request, CUPE will also provide individuals with information about what personal information exists, the ways in which it has been used, and, if applicable, to whom it has been disclosed.

PIPA allows organizations to charge a “minimal” fee for providing an individual with access to their personal information. We will keep any such fees reasonable, covering only the staff time dedicated to recovering such information and copying such information. An estimate of any fees to be charged will be given in advance.

CUPE will endeavor to provide the requested personal information within 30 business days after it is requested, or we will give the individual written notice if we need more time to respond.

In some cases, CUPE may not give an individual access to certain personal information where authorized or required by PIPA to refuse access. CUPE will not disclose information that would reveal personal information about another individual or confidential business information that, if disclosed, could harm the competitive position of the organization.

If a request is refused in whole or in part, CUPE will tell the applicant in writing, providing reasons for the refusal and outlining further steps that are available to the applicant. CUPE will make every reasonable effort to resolve the dispute without having to involve the Office of the Information and Privacy Commissioner for British Columbia (the “OIPC”). However, CUPE will inform applicants of their right to ask the OIPC to review the decision.

12.0 How to Complain, Ask for Access or Ask Questions

CUPE’s British Columbia Privacy Officer or their designate is responsible for ensuring CUPE’s compliance with this policy and PIPA.

Individuals and members should direct any access requests, complaints, concerns or questions regarding CUPE’s compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, members can request that their concerns be considered by the CUPE BC Executive Board. CUPE BC will make every reasonable effort to resolve the concerns without having to involve the OIPC. However, the individual or member may also write to the OIPC.

Contact CUPE’s British Columbia Privacy Officer
British Columbia Regional Director, CUPE
6222 Willingdon Avenue, Burnaby, British Columbia, V5H 0G3
Email: bcregion@cupe.ca
Phone: (604) 291-1940

See also:

[CUPE BC Privacy Policy](#)

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