

## Liquor Plus Personal Information Protection Policy

At Liquor Plus, we are committed to providing our customers and team members with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our customers and team members, protecting their personal information is one of our highest priorities.

While we have always respected our customers and team members privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our customers and team members of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting customers and team members' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our customers and team members' personal information and allowing our customers and team members to request access to, and correction of, their personal information.

### Definitions

**Personal Information** – means information about an identifiable *individual*. This includes an individual's name, home address and phone number, age, sex, marital or family status, physical description, financial information, educational history etc. Personal information does not include contact information (described below). PIPA allows personal information to be collected, used, or disclosed for reasonable purposes.

**Contact information** – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.

**Privacy Officer** – means the individual designated responsibility for ensuring that Liquor Plus complies with this policy and PIPA.

## ***Policy 1 – Collecting Personal Information***

- 1.1 Unless the purposes for collecting personal information are obvious and the customer or team member voluntarily provides their personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 We will only collect customers and team member information that is necessary to fulfill the following purposes:
  - To verify age and/or identity, we may collect your name, home address, home telephone number, and birth date.
  - To deliver requested products and services such as delivery, in store shopping, and the loyalty program, we may collect your name, address, email address, date of birth, and home phone number.
  - To meet regulatory requirements, we may collect information regarding your date of birth to ensure you are the legal drinking age in B.C.
  - To prevent theft and to protect the safety of our staff and customers, we may record your physical identity through in-store video surveillance (see Policy 8).

## ***Policy 2 – Consent***

- 2.1 We will obtain customers and team members' consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided verbally or in writing, or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the customers or team member voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a customer or team member is given notice and a reasonable opportunity to opt-out of his or her personal information being used for marketing information and the customers and team members does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), customers and team members can withhold or withdraw their consent for Liquor Plus to use their personal information in certain ways. A customers and team members decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the customers and team members in making the decision.
- 2.5 We may collect, use or disclose personal information without the customers and team members knowledge or consent in the following limited circumstances:
  - When a treaty requires or allows for disclosure without consent and the treaty is made under an Act or Regulation of British Columbia or Canada.

- When the disclosure is necessary to comply with a subpoena, warrant, or order by a court or other agency with jurisdiction to compel the production of personal information; for example, Liquor Plus may disclose personal information without consent when a court order is served on the organization.
- When the disclosure is to a public body or law enforcement agency in Canada to assist an investigation of an offence under the laws of Canada or a province of Canada; for example, disclosing personal information to WorkSafe BC to carry out an investigation of a workplace accident.
- When the information is disclosed to respond to an emergency that threatens the health or safety of an individual or the public, and if notice of the disclosure is mailed to the last known address of the individual to whom the personal information relates. For example, if an individual makes a serious threat against another person, the information may be disclosed to prevent the person from harm.
- When disclosure is needed to contact next of kin or an emergency contact of an injured, ill, or deceased individual.
- When the disclosure is to a lawyer representing Liquor Plus.
- On behalf of another organization in order to carry out work for that organization if the individual has already consented to the disclosure of the personal information, and provided that the disclosure is consistent with the purpose for which the personal information was originally collected.
- When the disclosure is to another organization, individual, or public body, if the information was collected for the purpose of providing legal services or other services to a third party and the disclosure is necessary.

### ***Policy 3 – Using and Disclosing Personal Information***

3.1 We will only use or disclose customer or team member personal information where necessary to fulfill the purposes identified at the time of collection, or for a purpose reasonably related to those purposes such as:

- To provide an individual with a product or service or to evaluate whether an individual is eligible for a benefit
- Providing information when lawfully requested to a governmental body, such as the CRA

3.2 We will not use or disclose customer or team member personal information for any additional purpose unless we obtain consent to do so.

3.3 We will not sell customer or team member lists or personal information to other parties.

### ***Policy 4 – Retaining Personal Information***

4.1 If we use customer's personal information to make a decision that directly affects the customer, we will retain that personal information for at least one year so that the customer has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, we will retain customer personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

4.3 We will retain team member personal information for no less than four years after the record is created, pursuant to the *BC Employment Standards Act*.

## ***Policy 5 – Ensuring Accuracy of Personal Information***

5.1 We will make reasonable efforts to ensure that customer or team member personal information is accurate and complete where it may be used to make a decision about the customer or team member, or disclosed to another organization.

5.2 Customers or team members may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.

5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the customer or team members' correction request in the file.

## ***Policy 6 – Securing Personal Information***

6.1 We are committed to ensuring the security of customer and team member personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.

6.2 The following security measures will be followed to ensure that customer and team member personal information is appropriately protected:

- Use of locked filing cabinets
- Restricting access to personal information as appropriate (i.e., only those that have a valid need to know will have access)
- The use of user IDs, passwords, encryption, firewalls, and other technology to ensure privacy and security of data

6.3 We will use appropriate security measures when destroying customer or team member personal information such as deleting electronically stored information and shredding documents that contain customer or team member personal information.

6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

## ***Policy 7 – Providing Customers and Team Members Access to Personal Information***

7.1 Customers and team members have a right to access their personal information, subject to limited exceptions:

- The information is provided by solicitor-client privilege
- The disclosure of the information would reveal confidential information that, if disclosed, could, in the opinion of a reasonable person, harm the competitive position of the organization
- The information was collected or disclosed without consent, as allowed under sections 12 or 18 of PIPA, for the purposes of an investigation and the investigation and associated proceedings and appeals have not been completed
- The information was collected or created by a mediator or arbitrator in the conduct of a mediation or arbitration for which he or she was appointed to act under a collective agreement, under an enactment, or by a court
- The information is in a document that is subject to a solicitor's lien

7.2 Liquor Plus will not disclose personal information and other information under the following circumstances:

- The disclosure could reasonably be expected to threaten the safety or physical or mental health of an individual other than the individual that made the request;
- The disclosure can reasonably be expected to cause immediate or grave harm to the safety or to the physical or mental health of the individual who made the request;
- The disclosure would reveal personal information about another individual;
- The disclosure would reveal the identity of an individual who has provided personal information about another individual and has not consented to disclosure of their identity;

If any of the information in a document meets the criteria in policies 7.2, that information must be removed (severed) and the remaining information will be given to the applicant.

7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Privacy Officer.

7.3 An applicant may ask to see the information or receive a copy of it. Applicants do not have to say why they are asking for the information.

7.4 Upon request, we will also tell customers and team members how we use their personal information and to whom it has been disclosed if applicable.

7.5 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.

7.6 If a request is refused in full or in part, we will notify the customer or team member in writing, providing the reasons for refusal and the recourse available to the customer or team member.

## ***Policy 8 – Video Surveillance***

8.1 To protect from theft as well as to protect the safety of our customers and team members, Liquor Plus has video surveillance monitoring in place 24 hour per day, 7 days per week.

8.2 Access to video surveillance recordings is limited to authorized Liquor Plus store and Company management. Recordings will only be reviewed by these individuals to investigate a significant security or safety incident, such as criminal activity. Recordings may be shared with law enforcement if necessary.

8.3 Surveillance recordings are retained securely behind password protected computers for 3 weeks. Recordings that are not needed for further review (due to circumstances in 8.2) are securely destroyed after 3 weeks by deletion of any electronically stored information.

8.4 Customers and team members are aware of recordings by surveillance notices posted at the front of each store.

8.5 In the event of a breach of surveillance information, Liquor Plus will follow the steps in policy 9.

## ***Policy 9 – Privacy Breaches***

9.1 A privacy breach occurs when there is unauthorized access to or collection, use, disclosure, or disposal of personal information. In the case of a breach of customer or team member information, Liquor Plus will:

- Take immediate steps to contain the breach, which could include stopping the unauthorized practice, recovering records, or correcting a weakness in security
- Evaluate the risks of the breach, including the personal information involved, the cause and extent of the breach, the individuals affected, and the foreseeable harm
- Notify affected individuals, if necessary, to avoid or mitigate harm. This notification will include the date of the breach, a description of the breach and the information compromised, risk(s) to the individual caused by the breach, the steps taken so far and future steps to prevent further breaches, contact information for the Privacy Officer, and contact information for the Privacy Commissioner of B.C.
  - Liquor Plus may also contact the police, insurers, professional or regulatory bodies, and the OIPC to report a breach
- Thoroughly investigate the cause of the breach and policies in place in order to prevent any further breaches

9.2 Any suspected privacy breaches must be reported to the Privacy Officer or a Senior Manager as soon as possible.

## ***Policy 10 – Annual Review***

10.1 In January of each year, Liquor Plus will conduct a review of our current privacy policies and procedures in order to ensure our compliance with PIPA. This includes:

- Analyzing our practices to ensure we are only collecting personal information as required and ensuring we are storing and destroying any information in accordance with PIPA
- Ensuring all team members and management are participating in ongoing training related to the collection, retention, and security of private information, and are aware of

current Liquor Plus privacy policies and procedures

***Policy 11 - Policy Questions and Complaints: The Role of the Privacy Officer or designated individual***

11.1 The Privacy Officer is responsible for ensuring Liquor Plus's compliance with this policy and the *Personal Information Protection Act*.

11.2 Customers and team members should direct any complaints, concerns or questions regarding Liquor Plus's compliance in writing to the Privacy Officer:

Becky Treleaven  
Human Resources Administrator  
4-1609 Blanshard Street  
Victoria BC V8W 2J5  
btreleaven@liquorplus.ca

11.3 Individuals can only submit complaints about things that directly affect them or someone they are acting on behalf of (such as an adult child complaining on an elderly parent's behalf with their consent).

11.4 If there is found to be a contravention under PIPA and there is not an immediate solution, the complaint will be investigated thoroughly and a response will be provided in writing the complainant once the investigation has been concluded, including the actions being taken to remedy the situation.

11.5 If the Privacy Officer is unable to resolve the concern or if the customer or team member is not satisfied with the response, a complaint may be raised with the Privacy Commissioner of British Columbia:

Office of the Information and Privacy Commissioner for British Columbia  
PO Box 9038 Stn. Prov. Govt.  
Victoria BC V8W 9A4  
250-387-5629  
info@oipc.bc.ca