



## **Modo Privacy Policy**

Modo's privacy policy outlines our commitment to respecting your personal information. We endeavour to communicate clearly what information we will collect from you, the reasons for collecting personal member information, the ways that the confidentiality of this information is protected, and finally, how members can request a copy of what personal information about them is recorded.

Modo is an independent co-operative and member information is not automatically shared with other organizations with which we are affiliated. Members (and potential members) can always choose not to provide Modo with some or all personal information; however, this decision may prevent Modo from determining membership eligibility and the ability to provide members with full access to available or requested services. We will not collect your personal information without your consent.

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### **Privacy officer**

Modo is responsible for the personal information that is collected from our members. Modo's Privacy Officer is Cata Velicea. He can be reached by email at [cata.velicea\(at\)modo.coop](mailto:cata.velicea@modo.coop) or at

Privacy Officer, Modo  
200 - 470 Granville Street  
Vancouver, BC V6C 1V5  
604-685-1393

## Reasons for collecting personal information

Modo collects personal information so that we can:

- Determine membership eligibility;
- Communicate with members about their participation in Modos carsharing program and other services requested by the member - including but not limited to follow-up about vehicle bookings and usage, invoices, newsletters, organizational announcements, etc.;
- Improve our services through member surveys and consultation conducted directly by Modo or by approved third parties; and
- Comply with legal and insurance requirements.

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## What kind of information Modo collects

As part of member participation in a carshare program, Modo collects a variety of information about its members. Typically, such information might include:

- Contact information, including your home address, telephone number, and e-mail address;
- Insurance needs, including such items as driver's licence, driving records (listing traffic violations) and claims history (listing claims made on your insurance policies);
- Credit information and history, including your credit report;
- Payment information, including your banking information, a record of your payment, your credit card information if you choose to make payments by credit card, and other information that you provide so that we can collect payment;
- Vehicle usage and membership history at Modo; and
- Publicly available information.

## How Modo collects information

For a majority of the time, Modo collects information directly from the member through application forms, surveys, member-initiated communications, and information that a member directly requests a third party to send to Modo. In some appropriate circumstances, we obtain information from third-party sources - for example, information is exchanged with affiliated carshare organizations on Modo members requesting usage of their vehicles. Driving records and credit information may be obtained from third-party sources such as other insurers or credit reporting agencies, as appropriate.

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## Member consent

Member knowledge and consent are required for the collection, use or disclosure of your personal information, except as required or permitted by applicable law. Modo only collects, uses or discloses personal information for purposes that are necessary to deliver carsharing services to you, or that we believe members would consider appropriate under the circumstances. When a person becomes a member of Modo, we will use his/her name and address for mailing and billing purposes, including sending account statements and newsletters.

Except as set out in this policy, or as required or permitted by applicable law, Modo does not sell or disclose any of your personal information to any other organization and Modo will not transmit personal information to third parties without first obtaining your consent to do so. Modo will never sell our member information. Modo may, however, disclose information in the following cases:

- to our lawyers and auditors;
- to a police force as required by law;
- in emergency situations affecting the life, vital health or safety of a member or individual;
- to all other persons or government agencies authorized by law;

- to credit reporting agencies or to an agent retained by Modo in connection with the collection of your account, if your account is in default or if requested by you;
- to a person who, in the reasonable judgment of Modo, is seeking information as your agent; or
- to a third party or parties where you consent to such disclosure.

Modo will also occasionally share aggregated information about our members. This information does not contain any personal information.

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### **Limiting collection, use and retention**

We collect only the information that we need in order to deliver services and information to you.

We do not use or disclose your personal information for any purposes other than those for which it was collected, except with your consent or as required or permitted by law.

Your personal information is retained only as long as necessary for the fulfilment of the purposes for which it is to be used. Modo does not keep your personal information if it is no longer needed for the purposes required or as required by law.

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### **Accuracy**

Your personal information is kept accurate, complete and up to date as is necessary and reasonably practical for the purposes for which it is to be used.

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### **Safeguards**

We protect your personal information by using safeguards that are appropriate to the sensitivity of the information, in accordance with Part 9 of the Personal Privacy Act.

**Our Employees' Responsibilities:** each of our employees is responsible for maintaining the confidentiality of all personal information to which s/he has access. We keep our employees informed about our policies and procedures for protecting personal information, and each employee and contractor signs a confidentiality agreement upon being engaged by Modo. If Modo contracts with an outside agency or contractor, Modo will ensure that they adhere to Modo's Privacy Policy.

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## **Openness**

We will make our policies and practices relating to the management of your personal information readily available to you.

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## **Member access**

Upon request in writing from you, you will be informed of the existence, use and disclosure of your personal information and you will be given access to that information. We will assist any member who informs us that they need assistance in preparing a request concerning personal information. You may challenge the accuracy and completeness of the information and have it corrected as appropriate.

**Accessing Your Personal Information:** If you wish to review or verify the personal information that Modo holds about you, or find out to whom we have disclosed it, you can do so by writing to us. Modo will normally respond within thirty (30) days to a request for access to your personal information. Modo can refuse access in certain circumstances.

**Accuracy of Your Personal Information:** You can ask to correct any of your personal information. The request for correction must be made in writing to us, either by mail, fax or e-mail at the above-mentioned address.

**Challenging Compliance:** You can address any challenge concerning our compliance with this policy to our Privacy Officer. Modo has established an internal complaint resolution procedure for privacy and information matters. Complaints are reviewed by the Privacy Officer, who will consult with the Executive Director, board members or other advisors, as appropriate. A written response will be provided to the individual, usually within thirty (30) days.