



# Privacy Policy

## **1.0 Privacy Policy**

### **1.1 Scope**

This privacy policy applies to:

- The Rideau Club employees, including contractors, members, and volunteers providing services on their behalf.
- Any personal Information that identifies an individual, in whatever form or medium (paper, digital, audio-visual, graphic) created or received in the course of carrying out the Rideau Club's functions and activities, and;
- All equipment required to collect, manipulate, transmit, or keep information for Rideau Club business purposes.

### **1.2 Legislative Requirements**

- The Personal Information Protection and Electronic Documents Act (PIPEDA) applies to every organization that collects, uses or discloses personal information in the course of commercial activities. It governs the collection, use and disclosure of personal information by private organizations, and balances the right of an individual to have his or her personal information protected and the need of an organization to collect, use or disclose personal information for purposes that are reasonable.
- As a non-profit organization, Rideau Club is not bound by the provisions of PIPEDA except if engaged in a commercial activity. Nevertheless, the Rideau Club is guided by PIPEDA in implementing best practices for the protection of personal information.

### **1.3 Privacy Statement**

The Rideau Club is committed to protecting the privacy of individual members, their families and guests. To that end, the Rideau Club has implemented a privacy program to meet the following privacy goals:

#### ***Accountability***

Rideau Club is responsible for protecting the confidentiality of personal information in its custody or under its control in compliance with the applicable federal and / or provincial legislation.

Rideau Club has identified and designated a Privacy Officer to be responsible for implementing the privacy program and ensuring compliance with legislation.

#### ***Collection & Consent***

Rideau Club collects personal information only for reasonable business purposes and with the consent of the individual or authorized representative, except where otherwise authorized by legislation.

#### ***Limited Use, Disclosure & Retention***

Rideau Club uses, discloses and retains personal information for purposes consistent with the purpose for which it was collected. Use and disclosure for other purposes is by consent of the individual or as authorized by legislation.

### ***Accuracy***

Rideau Club makes all reasonable efforts to ensure that personal information collected, used or disclosed by or on behalf of the Rideau Club is accurate and complete.

### ***Right of Access***

Individuals have a right to access information that the Rideau Club holds about them, subject only to limited and specific exceptions. Individuals who believe there is an error or omission in their personal information have a right to request correction or amendment of the information.

### ***Compliance Challenges***

Individuals are encouraged to bring any concerns or issues regarding privacy to the Privacy Officer for discussion and response. An individual may also ask the Office of the Privacy Commissioner to review Rideau Club's response to the individual's access to information request or a request for correction, or any policies or practices that the individual feels are not in compliance with legislative requirements. However, in light of the Rideau Club's non-profit status, the Office of the Privacy Commissioner may determine that it does not have the authority to deal with a particular matter.

## **2.0 *Collection, Use & Disclosure of Personal Information***

### **2.1 *Collection of Personal Information***

1. The least amount of information is collected, with the highest degree of anonymity, solely to meet reasonable business purposes. The purposes for collection may include:
  - Assessing Rideau Club Membership eligibility
  - Verifying and maintaining membership status in accordance with Club Bylaws
  - Ensuring the health and safety of members and guests
  - Registration and participation in events and activities
  - Processing product and food sales, including sales on Member's Accounts
  - Membership and financial accounting
  - Arranging for and processing of membership payments
  - Communication with Club members
  - Creating and displaying media content included in the Rideau Club Gazette, Website, Social Media, Member Broadcasts, and promotional materials.
2. Rideau Club collects personal information with the consent of the individual, consistent with the consent standards set out in PIPEDA.
3. Rideau Club collects personal information about an individual directly from the individual the information is about, or from an authorized representative.
4. Personal information can be collected without the consent of the individual in certain circumstances, including:
  - Collection of the information is authorized or required by statute or regulation;
  - It is clearly in the interests of the individual and consent cannot be obtained in a timely way or the individual would not reasonably be expected to withhold consent;
  - Collection of the information is from a public body authorized or required by statute to disclose the information to the Rideau Club;
  - The collection of the information is reasonable for the purposes of an investigation or a legal proceeding;
  - or
  - Collection of the information is necessary to collect a debt owed to the Rideau Club.

## **2.2 Use & Disclosure of Personal Information**

1. Rideau Club uses and discloses personal information collected with consent only for the purposes to which the individual has consented. If Rideau Club later wishes to use or disclose personal information for a purpose other than that for which it was originally collected, the Club will obtain the individual's consent before any such use or disclosure is made unless consent is not required.
2. Personal information can be used or disclosed without the consent of the individual in certain circumstances, including:
  - Use or disclosure of the information is authorized or required by statute or regulation;
  - It is clearly in the interests of the individual and consent cannot be obtained in a timely way or the individual would not reasonably be expected to withhold consent;
  - Use or disclosure of the information is reasonable for the purposes of an investigation or a legal proceeding;
  - Use or disclosure of the information is necessary to collect a debt owed to the Rideau Club or for the Rideau Club to repay money owed to an individual; or
  - Use or disclosure of the information is necessary to respond to an emergency that threatens the life, health or security of an individual or the public.
3. There are certain additional circumstances in which personal information can be disclosed without the consent of the individual, including:
  - Disclosure of the information is for the purpose of complying with a subpoena, warrant or order issued by a court, person or body having authority to compel production of such information;
  - Disclosure is to a public body or law enforcement agency in Canada to assist in an investigation for the purposes of a law enforcement proceeding; or
  - Disclosure of the information is for the purposes of contacting next of kin or a friend of and injured, ill or deceased individual.
4. Rideau Club ensures that individuals or their authorized representative are notified of any new purpose for which personal information will be used or disclosed.

## **2.3 Notification Requirements**

1. Rideau Club ensures that the individual is notified of the purposes for collecting, using or disclosing their personal information, before the information transaction takes place, unless it is for one of the purposes for which consent is not required.
2. Rideau Club notifies individuals through the use of appropriate notices, forms, posters, verbal statements, brochures, or other forms of communication.

## **3.0 Consent Standards for Personal Information**

1. Rideau Club obtains the consent of the individual before collecting the information. If additional consent is required for the use or disclosure of information for any purposes other than those for which the information was collected, consent will be obtained from the individual before any such use or disclosure occurs.
2. There are three options for determining the appropriate consent forms or process:
  - *Express consent*: Individual is informed of the purposes for which the personal information is to be collected, used and/or disclosed, and expressly gives permission, either in writing (including by electronic transmission) or orally, before action taken.
  - *Implied or deemed consent*: Permission is reasonably implied based on clear and direct actions and circumstances under which the information was voluntarily provided by the individual, without even notifying the individual of the purposes.
  - *Opt-out*: An individual is given reasonable opportunity to decline or object to having their personal information collected, used or disclosed for the identified purposes. If the individual provides no response when given such opportunity, consent is presumed.

3. Express or implied consent is required for collection of all personal information, unless specifically authorized in policy.
4. Opt-out is only used when dealing with personal information limited to an individual's name, and other contact information.
5. Only the individual or authorized representative can provide consent.
6. Rideau Club cannot refuse a service to an individual if they refuse to give their consent for the collection of personal information beyond what is reasonably required to provide the service.
7. An individual may refuse to give their consent for personal information to be collected in relation to a specific purpose Rideau Club has identified. In the event that an individual places reasonable conditions on their consent, the Club must consider whether there is another way the purpose may be achieved without collecting the information.
8. An individual may revoke or vary consent at any time.
9. Personal information is deemed to have been collected with appropriate consent and notification if it was collected before January 1, 2004.

#### **4.0 Information Handling & Security**

##### **4.1 Administrative Safeguards**

1. Rideau Club ensures that policies and procedures to facilitate the safeguarding of personal information in its custody or control are developed and maintained.
2. The need for confidentiality and security of personal information is addressed as part of the conditions of employment for Rideau Club employees, beginning with the recruitment stage. All staff must be aware of, and appropriately trained with regard to policies and procedures for safeguarding personal information.
3. Before implementing proposed new administrative practices or information systems that will change or significantly affect the collection, use and disclosure of personal information, Rideau Club will complete an assessment that describes how the new initiative will affect privacy, and what measures the Club will put in place to mitigate risks to privacy.
4. Rideau Club employees and persons acting on behalf of the Club will report all violations and breaches of information security as soon as possible to the Rideau Club's Privacy Officer. This enables the Privacy Officer to take corrective action to resolve the immediate problem and minimize the risk of future occurrence.

##### **4.2 Physical Safeguards**

1. All records kept by the Rideau Club, both on-site and off-site, are held and stored in an organized, safe and secure manner.
2. Appropriate fire detection and extinguishing devices are located in areas where personal information is stored.
3. Rideau Club's records are not accessible by unauthorized persons. In areas where unauthorized persons are present, measures will be taken to ensure that files are not left unattended or accessible.
4. Computers or monitors that are left unattended in reception areas of areas where personal information is processed are secured and logged off, either manually or by default timer.
5. All servers and equipment storing electronic personal information are secured by locked cabinets or rooms within the Rideau Club when not under direct supervision by staff.
6. Appropriate measures are taken to control the distribution of keys or pass codes, and to ensure they are returned or changed after employment or association with the Rideau Club has ended.
7. All personal information will be treated with sensitivity. Staff will take care when sharing information if conversations can be overheard or intercepted by unauthorized individuals.
8. Personal information that is transmitted by mail or courier will be sealed, marked as confidential, and directed to the attention of the authorized recipient.
9. Rideau Club employees will verify the identity and credentials of courier services used for the transportation of personal information.
10. Information that is not confidential or sensitive in nature will be recycled. All personal information is destroyed by shredding.

11. All information will be deleted using secure data wiping techniques prior to disposal of electronic data storage devices (e.g. surplus computers, internal and external hard drives, diskettes, tapes, CD-ROMS, photocopier hard drives, USB flash drives, etc.), or the device(s) will be destroyed.
12. The retention period for personal information is set according to the business requirements of Rideau Club. Information is to be kept only for as long as is reasonable, depending on the circumstances

#### **4.3 Technical Safeguards**

1. Firewalls, intrusion detection software, or other technical means to protect internal Rideau Club networks carrying identifiable personal information is in place to prevent unauthorized use and malicious software.
2. Access to data and application systems containing personal information is limited by each employee's functional role and need to know.
3. Employees of the Rideau Club access and use information systems under their assigned User ID. The use of another person's assigned User ID is prohibited.
4. Access to Rideau Club's information systems is controlled and password protected. Passwords are kept confidential at all times and will not be written down, posted publicly, or shared with other staff.
5. Fax machines and printers that may be used to send or receive personal information are located in a secure area.
6. Email messages must contain a confidentiality notification.
7. To detect unauthorized access and prevent modification or misuse of user data in applications, systems may be monitored to ensure conformity to access policies and standards. Appropriate security controls, such as event logs, will be implemented and reviewed as required.
8. Computer systems that hold critical or sensitive information, including personal information, will be backed up on a daily basis. Backed up information is stored in a secure environment off-site. Information that is intended for long-term storage on electronic media (e.g. tape, DVD, disk) will be reviewed on an annual basis to ensure the data is retrievable, and to migrate the data to another storage medium if necessary.

#### **4.4 Contractors**

1. Rideau Club ensures that contracted service providers (e.g. contractors, consultants, support service providers or business partners) comply with the Club's privacy and security policies.
2. Contracted service providers will be required to demonstrate that the service provider's privacy and security policies are of a standard that is at least comparable to the Rideau Club's standards. Where two standards exist, the service provider shall be held to the higher of the two standards.
3. Contracted service providers are to immediately report breaches of confidentiality and privacy to Rideau Club's Privacy Officer.
4. Rideau Club retains the right to inspect the premises and security practices of contracted service providers without notice to ensure compliance with contract provisions and stated policies.

### **5.0 Right of Access & Correction**

#### **5.1 Individual Requests for Access to Their Own Information**

1. Requests from individuals to access basic personal information about themselves (e.g., contact information, facility use statistics) are handled as a routine release of information.
2. Formal requests for access to information that may involve review and severing must be in writing to the Rideau Club's Privacy Officer, or designate. A person may request access to another individual's personal information only if that person has a signed consent from the Individual.
3. Individuals making routine or formal requests may be required to provide sufficient information to verify their identity and authority to access to the information. Any such information provided shall be used for these purposes only.
4. Rideau Club responds to formal requests for access to personal information within thirty (30) calendar days of receipt of the request

5. Rideau Club does not charge the individuals for access to their own personal information. However, reasonable fees may be charged for reproduction, transcription, or transmission of information, so long as the individual is notified before these costs are incurred. A fee for reasonable costs incurred may be charged when responding to more complex requests. The individual will be informed of the fee in advance.
6. Requested information will be provided in a form that is generally understandable. Rideau Club will endeavor to explain the meaning of the content, codes and abbreviations included in the individual's record to the extent that it is reasonably practical.
7. Individuals are permitted to view either the original record, or to request a copy of the record, subject to the exceptions set out in this Policy. To preserve the integrity of the record and ensure that documents are not removed from the Rideau Club, an individual wishing to view an original record will do so under the supervision of designated personnel.

### **5.2 Exceptions to Right of Access**

1. In certain situations, Rideau Club must refuse to provide access to personal information:
  - If the disclosure of the information could reasonably be expected to threaten the life or security of another individual;
  - If the information would reveal personal information about another individual; or
  - If the information would reveal the identity of an individual who has in confidence provided an opinion about another individual and the individual providing the opinion does not consent to disclosure of his or her identity.
2. Additionally, Rideau Club may refuse to provide access to personal information in certain circumstances, including if:
  - The information is protected by solicitor-client privilege;
  - The disclosure of the information would reveal confidential commercial information;
  - The information was collected for an investigation or legal proceeding relating to a breach of agreement or contravention of law;
  - The disclosure of the information might result in that type of information no longer being provided to the Club when it is reasonable that that type of information would be provided;
  - The information was collected or created in the course of a formal arbitration or mediation process;
3. If Rideau Club is reasonably able to sever excepted information from a record containing personal information about the individual requesting access, the Club will provide that individual with access to the part of the record containing the personal information after the excepted information has been severed.
4. Rideau Club informs the individual in writing of any refusal of a request for access to personal information, the reason(s) for the refusal, and any recourse the individual may have to challenge the Club's decision.

### **6.0 Individual Requests to Correct or Amend Personal Information**

1. Requests from individuals to correct / amend information about themselves (e.g. change of name or address) are handled as a routine correction of information.
2. Formal requests to correct or amend information subject to review must be in writing to the Rideau Club's Privacy Officer, or designate. An individual may request the correction of another person's information only if they have that person's signed consent.
3. All formal requests must be accompanied by appropriate documentation to support the request before the Rideau Club will amend the information as required or as appropriate. If amendments are made, the original information must not be deleted but retained and marked as incorrect by crossing out, for example. The amended information will be transmitted to third parties as appropriate, in accordance with the provisions of this Policy regarding the disclosure of personal information.
4. Rideau Club responds to formal requests for correction or amendment of personal information within thirty (30) calendar days of receipt of the request.

5. Rideau Club informs the individual in writing of any refusal of a request to correct or amend personal information, the reason(s) for the refusal, and any recourse the individual may have to challenge Rideau Club's decision.
6. If the individual is not satisfied with the results of his/her request, Rideau Club internally documents the issue in the relevant record(s) and provides a response. The existence of the unresolved challenge will be transmitted to third parties, as appropriate.

## **7.0 Individual Challenges to Request Responses**

Individuals are encouraged to bring any concerns or issues about the Club's responses to requests or its compliance with this Policy to Rideau Club's Privacy Officer for discussion and mediation. Individuals may also challenge responses in writing to the Information and Privacy Commissioner of Ontario. However, in light of Rideau Club's non-profit status, the Office of the Information and Privacy Commissioner may determine that it does not have the authority to deal with a particular matter. In such case, challenges to responses to requests regarding personal information are limited to the Rideau Club's Board of Directors.

## **8.0 Roles & Responsibilities**

### **8.1 Privacy Officer Responsibilities**

The General Manager/COO is designated by the Board of Directors to act as Privacy Officer for Rideau Club.

The responsibilities of the Privacy Officer include:

- Identifying privacy compliance issues for the Rideau Club;
- Ensuring that privacy and security policies and procedures are developed and maintained as necessary;
- Ensuring that Rideau Club's employees, volunteers and contracted personnel are aware of their duties, roles, and responsibilities under applicable privacy policies, procedures and legislation;
- Providing advice on, and interpretation of, applicable privacy legislation, including release / non-release of information;
- Responding to requests for access to information, or to correct or amend personal information, and facilitating the requests as necessary;
- Ensuring the overall security and protection of personal information in the custody or control of the Rideau Club;
- Representing Rideau Club with respect to privacy matters, in dealings with third parties, the provincial government and the federal or provincial Commissioners, as necessary.

### **8.2 Employees**

All employees are responsible for implementing Rideau Club's privacy policies and procedures for all personal information they collect, use, disclose, handle, or view. All employees:

- Make themselves aware of and adhere to access to information and privacy policies and standards;
- Access, release and protect information in their custody or control according to policy;
- Refer all decisions about collection, use, disclosure, and access that are not clearly directed by policy to the Rideau Club's Privacy Officer, or designate.