

# PRIVACY POLICY

## ***Purpose:***

The Calgary Winter Club (the "**Club**") is committed to protecting the privacy of its members ("**Members**"). This Privacy Policy ("**Policy**") applies to the Club's collection, use, and disclosure of personal information.

## ***Scope:***

This Policy is intended to comply with the applicable federal and provincial privacy legislation in all the jurisdictions that it operates.

## ***Policy:***

### 1. **DEFINITION OF PERSONAL INFORMATION**

- (a) "**Personal information**" is information about an identifiable individual but does not include contact information. Examples of personal information includes information such as your address, gender, age, ID numbers, income, ethnic origin, credit records, or medical records.
- (b) "**Contact information**" is information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual

### 2. **COLLECTION AND USE OF PERSONAL INFORMATION**

- (a) Except where otherwise required or permitted by law, the Club will inform Members of the purposes for the collection, use or disclosure of the Member's personal information, prior to collecting, using or disclosing that personal information.
- (b) The Club collects information from Members in the course of its business through various means including, but not limited to:
  - (i) registration and application forms;
  - (ii) the Club's programs and services; and
  - (iii) online applications, services, and systems.

The type of information collected will vary depending on the means through which an Member submits his/her personal information. The type of information collected may include a Member's name, residential address, e-mail address, home phone number, occupation, credit card information, and bank account information.

- (c) The Club uses information collected from Members to:
  - (i) provide services;
  - (ii) respond to requests for information regarding the Club's services,
  - (iii) market special events, and promote its services;
  - (iv) communicate with the Members;
  - (v) complete accounting and transactions purposes; and

for additional purposes that may be identified at or before the time that the information is collected.

### **3. DISCLOSURE OF PERSONAL INFORMATION**

- (a) The Club will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the Member or as required or permitted by law.
- (b) The Club may disclose certain personal information to third party service providers and to affiliated entities in order to carry out work on behalf of the Member. Prior to making this disclosure, the Club will take appropriate steps to ensure that such recipients safeguard the personal information and use the information only for authorized purposes.

### **4. CONSENT**

- (a) Requirements for consent to collection, use, or disclosure of personal information vary depending on circumstances and on the type of personal information that is intended to be collected, used or disclosed. In determining whether consent is required and, if so, which form of consent is appropriate, the Club will take into account both the sensitivity of the personal information at issue and the purposes for which the Club will use the information. Consent may be express, implied (including through use of "opt-out" consent where appropriate), or deemed. For example, if a Member provides his/her mailing address and requests information regarding a particular service, consent to use the address to mail service information to the Member is implied.
- (b) By submitting personal information to the Club or its service providers and agents, the Member agrees that the Club may collect, use and disclose such personal information in accordance with this Policy and as permitted or required by law.
- (c) Subject to legal and contractual requirements, the Member may refuse or withdraw their consent to certain of the identified purposes at any time by contacting the Privacy Officer. If the Member refuse to consent or withdraw his/her consent, the Club may not be able to provide or continue to provide the Member with the services of the Club.

### **5. MEMBER GROUP EMAIL**

- (a) All group email initiatives must be approved by the Club's Chief Privacy Officer.
- (b) Generally, department heads, sports professionals or management staff will be authorized to conduct a group mailing.
- (c) Staff members are authorized to collect and compile email addresses on behalf of the Club.
- (d) Unless approved by the Chief Privacy Officer, members or volunteers are not authorized to collect and compile email addresses on behalf of the Club.
- (e) Any documentation soliciting collection of email address shall state the intended use of the email address list.
- (f) Email addresses are not essential in conducting club business; therefore, members shall be given an option to provide the address.
- (g) To ensure security, adequate backup and ease of updating all member email address lists shall be stored centrally on the Club's file server.

- (h) For security purposes, hard copy email address lists shall not be produced.
- (i) Mailings must be initiated from a Calgary Winter Club computer and email address.
- (j) Addresses other than the direct recipient must be hidden from view or access by any other recipients on the list.
- (k) All mailings shall include an opt-out option for future mailings.

**6. ACCURACY**

- (a) Personal information is kept as accurate, complete and up to date as appropriate. It is the responsibility of each Member to provide the Club with any changes in personal information so that the appropriate records may be accurately maintained.
- (b) A Member may request in writing that the Club correct an error or omission in personal information. If the Club is satisfied that a correction should be made, it will amend the information as requested and, where appropriate, will send the corrected information to the third parties to which it has disclosed that information.
- (c) Access requests should be made, in writing, to the Privacy Officer. The written request must also provide sufficient detail so that the Privacy Officer can properly and efficiently respond to the request.
- (d) The Club will respond to the written requests within 30 days, or alternatively, the timeframe prescribed by the relevant legislation.

**7. ACCESS**

- (a) A Member may request in writing access to his or her personal information and information regarding the collection, use and disclosure of that personal information. The Club will provide appropriate access to personal information requested. A written explanation will be provided if the requested access is not granted. Access requests should be made, in writing, to the Privacy Officer.
- (b) The Club will respond to the written requests within 30 days, or alternatively, the timeframe prescribed by the relevant legislation.

**8. PERSONAL INFORMATION RETENTION**

- (a) The Club retains personal information in accordance with its legal or business practices. Once the personal information is no longer required to fulfill the purpose for which it was collected and no longer required or permitted to be retained for legal or business purposes, it will be destroyed or made anonymous.

**9. PROTECTION OF PERSONAL INFORMATION**

- (a) The Club takes appropriate steps to protect personal information whether in paper or electronic form from unauthorized access disclosure use or modification. These steps include but are not limited to:
  - (i) protecting the confidentiality of your personal information when doing business internally or externally with other organizations;
  - (ii) protecting your personal information with appropriate and effective security safeguards, including physical, administrative, and technology safeguards, against

such risks as loss or theft, unauthorized access, disclosure, copying, use or destruction, regardless of the format in which it is held; and

- (iii) retaining personal information only as long as necessary for the fulfilment of the identified purposes, or as required by law, and will maintain reasonable and systematic controls, schedules and practices for the retention and destruction of such information.

#### 10. **CONCERNS OF A NON-COMPLIANCE**

- (a) A Member may direct a complaint concerning compliance with the Policy to the Club's Privacy Officer.
- (b) The complaint must be in writing. Within a reasonable time of receipt of the complaint, the Privacy Officer will conduct an investigation into the complaint. The format of this investigation will vary depending on the circumstances and may or may not involve an interview of the complainant and/or the Club's employees conducted by the Privacy Officer.
- (c) After the investigation into the complaint, the Club will take appropriate measures necessary to rectify the source of the complaint if it is necessarily required.
- (d) Within a reasonable time of conclusion of the investigation, the Privacy Officer will inform the complainant, either verbally or in writing, of:
  - (i) the result of its investigation; and
  - (ii) any appropriate measures the Club will take to rectify the source of the complaint if necessarily required.

#### 11. **PRIVACY OFFICER**

The Board of Directors has appointed the CEO/General Manager as the Club's Chief Privacy Officer. All privacy related questions, requests, or concerns should be directed to:

Kevin Boyles  
4611 – 14<sup>th</sup> Street NW  
Calgary AB T2K 1J7  
Email: kevinb@calgarywinterclub.com  
Phone: 403 338 2414 Fax: 403 282 6392

#### 12. **CHANGES TO THE PRIVACY POLICY**

The Club reserves the right to modify this Policy at any time. The Club will communicate any revised version of this Policy by providing reasonable notice of the revised Policy.