# Privacy and Confidentiality Policy May 13, 2016

# **Background:**

This policy is voluntary in the respect that we, as a non-profit organization, under the Personal Information Protection and Electronic Documents Act (PIPEDA) "are not subject to the Act because we do not engage in Commercial activities. This is typically the case with most charities, minor hockey associations, clubs, community groups and advocacy organizations. Collecting membership fees, organizing club activities, compiling a list of members' names and addresses, and mailing out of newsletters are not considered commercial activities. Similarly, fundraising is not a commercial activity. However some clubs, for example, many golf and athletic clubs, may be engaged in commercial activities which are subject to the Act."

(Source: The Application of the Personal Information Protection and Electronic Documents Act to Charitable and Non Profit Organizations <a href="http://www.priv.gc.ca/resource/fs-fi/02\_05\_d\_19\_e.asp">http://www.priv.gc.ca/resource/fs-fi/02\_05\_d\_19\_e.asp</a>)

Noting the above, CFUW Ontario Council (OC) believe a good risk management plan includes a privacy policy to assure our members that we, the CFUW OC Executive, will take all reasonable steps/actions to protect the privacy of the information we collect. This policy covers the OC specific activities and jurisdiction. Many of the Regional Director activities involving personal information are CFUW National directives and as such will be governed by the CFUW National Privacy Policy.

## **Commitment:**

CFUW OC values the trust and relationship of our Ontario members and of our community partners. All OC Executive members shall take all reasonable steps to protect the privacy of the personal information collected and retained on our members and others with whom the council interacts.

## **Membership Information:**

CFUW OC collects personal information about its members through OC activities including but not limited to its Standing Committee Meetings and Annual General Meeting registrations, electronic OC Newsletter subscriptions, and OC Clubs and Advocacy Issues Listing, through updates to the above information provided by Ontario members from time to time and other OC activities.

### Consent:

The consent of members to the collection, use or disclosure of personal information is required and is assumed in cases where you volunteer your personal information for an obvious purpose. Examples include: subscription permission for the OC newsletter, the registration form for the Standing Committee Meetings and Annual General Meetings and voluntary registration to the OC Clubs and Advocacy Issues Listing.

## **Purpose of Collection of Personal Information:**

Personal information is obtained and retained to facilitate communication between the club and its members and among members themselves, to: 1. conduct OC business including but not limited to: Standing Committee meetings and Annual General Meetings; 2. prepare and publish regular newsletters and alerts to subscribers; 3. prepare and publish regular updates to the OC Clubs and Advocacy Issues list; 4. provide information requested by the CFUW National office.

## Limiting Collection, Use, Disclosure and Retention of Information:

The personal information collected shall be limited to that which is necessary for the purposes described above or deemed necessary from time to time to deliver requested products and services. Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or required by law. CFUW OC shall retain personal information provided to it, only for so long as it is required for the purposes as stated above. Once personal information is no longer required for the stated purposes, or upon request of an individual member or community partner, such information shall be disposed of in a secure manner.

# **Accuracy and Security:**

CFUW OC shall take all reasonable steps to maintain the accuracy of the personal information retained. CFUW OC shall take all reasonable steps to ensure that the information provided to it is not used for the purposes other than those for which the information was obtained. CFUW OC, when made aware, will tell anyone misusing CFUW OC collected personal information to stop, verbally and in writing.

## Openness:

CFUW OC shall provide, upon request, information about its policies and practices respecting the management of personal information. The policy is published on the CFUW OC's website.

### Access:

Upon request to the President of CFUW OC, as the Privacy Officer, any individual shall be informed of the existence and use of her personal information and shall be given access to that requested information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended or deleted as appropriate.

# Date Effective:

CFUW OC shall, from time to time, review and revise its privacy practices and this policy. If any change is made, members shall be notified.

#### MANAGEMENT AND PRACTICES OF PERSONAL INFORMATION:

- The CFUW OC President, CFUW OC Treasurer and CFUW Communications director or other designated OC Board member, will be the 'keepers' of the personal information.
- Any bulk, electronic newsletters or alerts to our OC members will be sent in the following manner: TO: Sender; BLIND COPY (BCC) to the email address group.
- This policy is available on the CFUW OC's website.
- CFUW OC executive members are not to use or distribute any personal information about club members published in our membership list to any other party for any purpose, without written consent from the CFUW OC President.
- CFUW OC executive members are not to use personal information about CFUW members to promote their own business or personal interests without written consent from the CFUW OC President.
- Electronic copies of CFUW OC Executive Committee meeting agendas and minutes shall be safely stored.
- Similarly, website email addresses are generic and are linked to certain Executive positions (i.e. <a href="mailto:secretary@cfuwontcouncil.ca">secretary@cfuwontcouncil.ca</a>) for security reasons.
- Similarly, last names of CFUW OC members will not be made available to the public in the advertising of club activities unless by express consent of those said members.

### **DEFINITIONS:**

"Personal Information": is defined as a member's name(s), address, telephone/cell number(s), email address(es), educational background, and areas of interest or advocacy work.

"Consent:" CFUW OC members provide express consent to use their information in the registration processes for Annual General Meeting or Standing Committee Meetings or in the sign-up for the Advocacy Issues List or in the distribution of regular CFUW OC newsletters by registering for said events or subscribing for the OC newsletter.