

4054 – BCC Privacy Policy

4054. 1 Policy Statement:

The Barrie Curling Club (BCC) is committed to collecting, using, and disclosing personal information responsibly and to maintaining the accuracy, confidentiality, and security of personal information. Personal information is that which is identifiable to an individual but is not found in any public directory. The intent is to balance legitimate business interests of using personal information to ensure the diligent provision of BCC's mandate through the creation and use of professional standard BCC products or services including its website and social media platforms against reasonable expectations of privacy.

4054. 2 Policy Direction:

The following criteria and guidance shall be respected when collecting, using and protecting personal information for the provision of BCC's mandate:

1. **Applicability of BCC's Privacy Policy.**

- a. Except as otherwise expressly included in this Privacy Policy, this document only addresses the collection, use and disclosure of personal information that the BCC General Manager office collects and uses to support operations.
- b. Personal information provided directly to volunteers, conveners, or other club members for the purpose of organization of club activities on an ad hoc basis is the responsibility of the parties involved. Notwithstanding this, members operating within BCC are advised of this policy; the importance of safeguarding any such personal information; and, are directed to be mindful of eliminating or minimizing any additional collection, retaining or sharing of personal data that could not otherwise be accessed through the General Manager for BCC purposes.
- c. When individuals disclose their personal information to other (third) parties operating or present within BCC premises, different rules may apply to its collection, use or disclosure; thus, individuals are then subject to the privacy policies of such third parties.

2. **Use of Personal Information.**

- a. Personal information may be used in a non-personally identifiable format to:
 - i. improve marketing; promotional efforts; content and product offerings;
 - ii. customize the website content, layout and services;
 - iii. ensure the provision of high quality products and/or services; and,
 - iv. analyze memberships to improve the business and to better tailor the business to meet membership needs.
- b. Personal information may be used in an identifiable format to:
 - i. manage BCC responsibilities as described at the time of collection;
 - ii. enable BCC to contact; establish; and, maintain communications with individuals;
 - iii. compare and review the information for errors, omissions, and accuracy;
 - iv. inform about online and offline offers, products, services, updates and events (including expiry and renewal of memberships);
 - v. invoice for products and/or services or collect unpaid accounts. If financial information is provided it may be used to bill or provide associated support;
 - vi. assist in complying with legal and regulatory requirements; and,
 - vii. enable reorganization, a merger, or acquisition with another entity or a transfer of the business.

3. **Disclosure of Personal Information.**

- a. BCC does not sell, rent, or lease any of your personal information to third parties without your explicit consent.
- b. To an individual who, in our reasonable judgment, is seeking the information as your agent and the BCC is satisfied that the individual is requesting the information on your behalf.
- c. As and when required by law.
- d. Names and telephone numbers are disclosed to facilitate communications in connection with league activities.

4. Access, Review, Change and Destruction of Your Personal Information.

Access, review and/or change the personal information in BCC files is done by submitting a written request to do so to the General Manager. Members are responsible for prompt notification of any changes required.

5. Protecting Personal Information.

The personal information that is retained by BCC is kept in a secure environment with reasonable procedural and technical safeguards to protect against loss, theft and unauthorized access or disclosure. While several different security techniques are used to protect such data from unauthorized access by users inside and outside the Club, there is no ability to ensure perfect security. BCC contracts with a reputable internet and website provider and separates sensitive data by a layer of secure login protocols; however, this is the limit of the security provisions in relation to the internet/website.

6. Policy Amendment Notification.

This Privacy Policy may be updated or amended at any time through one or all of the following means by: mailing (including regular and e-mail as applicable) the amended terms to members; posting the amended terms on the website or at the Barrie Curling Club; or, through announcements at member activities and events. All amended terms shall automatically be effective five (5) days after mailing or the date of posting or announcement.

4054.3 Policy Accountability:

Policy Authority: The 2nd Vice President is responsible for queries related to this policy.

Policy Application: This policy applies to all at BCC. Further, BCC expects equivalent privacy standards from its stakeholders. Failure to act within the privacy policy is serious. Depending upon the circumstances, an indiscretion could result in sanctions for members, disciplinary action for employees or termination of relationships with stakeholders.

410.4 Related Documents:

Applies as the underlying intent within the direction and message of all activities and documentation of BCC.

410.5 Policy Dates:

Board of Directors Approval Date: 2014

Policy Review Date: As Required