

NSC - Privacy Policy

Policy concerning
the protection of Personal Information

Date: November 8, 2004

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Status: Approved

Review and approved by the NSC Board of Directors:

Commodore: Jim Harris

Vice Commodore: Dominique Benoit

Rear Commodore: Larry Nicholls

Fleet Captain: Marcel Laroche

Treasurer: Christine Winrarz Searle

Secretary: Stewart Harrison

Social Director: Lyn Hall

Membership Director: Dale Purvis

Public Relations : Chris Hughes

Youth Director: Jeff Nelson

Past Commodore: Brian Aiken

1.0 Authority and Responsibility

1.1. Authority

This policy has been approved by the Board of Directors in accordance with Article 5.7 of By-law No. 1 of the Nepean Sailing Club ("NSC" or "Club") and is effective as of 28 October 2004.

1.2. Responsibility for Policy

The NSC Board Secretary is responsible for the operation of this policy and shall be assisted by the Vice-Commodore, the Membership Director, and the Public Relations Director.

2.0 Objectives

This policy is to ensure that Personal Information collected from NSC members, clients, volunteers, and event participants is treated in accordance with the Government of Canada's Personal Information Protection and Electronic Documents Act.

3.0 Introduction

The Nepean Sailing Club ("NSC" or "Club") is an organization that promotes and supports competitive sailing, cruising, and pleasure boating; provides sail training; and maintains facilities for the recreational and social activities of its members.

NSC places the highest value on ensuring the confidentiality of information about members and others, including any Personal Information, provided to us. In the course of operating our Club, NSC collects Personal Information and we have prepared this policy to inform you about NSC's ongoing commitment to

ensuring that the Personal Information obtained during the course of our activities remains accurate and confidential.

4.0 What is Personal Information?

"Personal Information" is any information, recorded in any form, about an identified individual or an individual whose identity may be inferred or determined from such information, other than business contact information (e.g. name, title, business address).

5.0 Why NSC may collect Personal Information

NSC may use the Personal Information provided verbally or in writing (including via electronic media) by members, volunteers, students and the general public in order to:

1. Provide sailing courses;
2. Provide mooring, storage, and launching services and facilities to our members;
3. Process fees and prepare invoices for members;
4. Provide information on courses and events;
5. Publish and distribute the Club's monthly newsletter;
6. Prepare and distribute the Blue Book, a comprehensive database of member information;
7. Rent meeting rooms;
8. provide statistics and trending to improve services at NSC;
9. Meet legal and regulatory requirements; and
10. Such other purposes consistent with these purposes.

6.0 How NSC Collects and Uses Personal Information

NSC only collects, uses, and discloses Personal Information for purposes that would be considered reasonable in the circumstances. NSC uses only fair and lawful methods to collect Personal Information. Our use of Personal Information is limited to the purposes described in this Policy and NSC does not otherwise sell, trade, barter, exchange or disclose for consideration any Personal Information it has obtained.

7.0 When NSC May Disclose Your Personal Information

NSC may disclose your Personal Information to individuals or organizations:

- Who assist NSC in informing you about our services;
- Who are other members of NSC; and
- Who have been retained by NSC to assist in providing services to our members or others.

In the event sensitive Personal Information (i.e., unlisted telephone numbers, financial information such as payment arrangements) is provided to NSC, we will not disclose such Personal Information unless it is required in order to provide our services.

Where NSC discloses Personal Information to organizations that perform services on its behalf, we will require those service providers to use such information solely for the agreed specific purposes of providing services to NSC, our members or the person concerned and to have appropriate safeguards for the protection of that Personal Information.

Please note that there are circumstances where the use and/or disclosure of Personal Information may be justified or permitted or where NSC is obliged to disclose information without consent. Such circumstances may include:

- Where required by law or by order or requirement of a court, administrative agency or governmental tribunal;
- Where NSC believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety or property of an identifiable person or group;
- Where it is necessary to establish or collect monies owing to NSC;
- Where it is necessary to permit NSC to pursue available remedies or limit any damages that we may sustain; or
- Where the information is public.

Where obliged or permitted to disclose information without consent, NSC will not disclose more information than is required.

8.0 Consent

Unless permitted by law, no Personal Information is collected, without first obtaining the consent of the individual concerned to the collection, use, and dissemination of that information. Consent may be obtained in writing, verbally, or electronically. However, we may seek consent to use and disclose Personal Information after it has been collected in those cases where NSC wishes to use the information for a purpose not identified in this Policy or not previously identified or for which the individual concerned has not previously consented.

The provision of Personal Information to NSC means that the person concerned agrees and consents that we may collect, use, and disclose their Personal Information in accordance with this Policy. In addition, where appropriate, specific authorizations or consents may be obtained from time to time.

In most cases, and subject to legal and contractual restrictions, a person is free to refuse or withdraw his or her consent at any time upon reasonable, advance notice. It should be noted that in certain circumstances, certain services can only be offered if you provide Personal Information to NSC. Consequently, if you choose not to provide us with any required Personal Information, we may not be able to offer you the services requested. We will inform you of the consequences of the withdrawal of consent.

9.0 The Accuracy And Retention Of Personal Information

NSC endeavors to ensure that any Personal Information provided, and in its possession, is as accurate, current, and complete as necessary for the purposes for which we use that information. If we become aware that Personal Information is inaccurate, incomplete, or out of date, NSC will revise the Personal Information. However, in order to ensure accuracy, we request that you notify us of any necessary changes to your Personal Information.

NSC will only keep Personal Information as long as it is required for the reasons it was collected. The length of time we retain information varies, depending on the service and the nature of the information. This period may extend beyond the end of a person's relationship with us but it will be only for so long as it is necessary for us to have sufficient information to respond to any issues that may arise at a later date.

When Personal Information is no longer required for NSC's purposes, the NSC have procedures to destroy, delete, erase or convert it into an anonymous form.

10.0 Protection of Personal Information

NSC takes the security of Personal Information seriously and makes every effort to safeguard it.

NSC endeavours to maintain appropriate physical, procedural and technical security with respect to its storage of information so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of

Personal Information. This also applies to our disposal or destruction of Personal Information.

NSC further protects Personal Information by restricting access to it to those individuals that the management of NSC has determined need to know that information in order that we may provide our services or information.

11.0 Access to Your Personal Information

NSC permits the reasonable right of access and review of Personal Information held by us about an individual by the individual in question, and will endeavor to provide the information in question within a reasonable time, generally no later than 30 days following the request.

We will provide information from our records in a form that is easy to understand. NSC reserves the right not to change any Personal Information but will append any alternative text the individual concerned believes to be appropriate.

NSC reserves the right to decline to provide access to Personal Information where the information requested:

- Would disclose (i) Personal Information about another individual or about a deceased individual; or (ii) trade secrets or other business confidential information that may harm NSC or the competitive position of a third party;
- Would interfere with contractual or other negotiations of NSC or a third party;
- Is subject to solicitor-client or litigation privilege;
- Is not readily retrievable and the burden or cost of providing would be disproportionate to the nature or value of the information;
- Does not exist, is not held, or cannot be found by NSC;
- Could reasonably result in (i) serious harm to the treatment or recovery of the individual concerned, (ii) serious emotional harm to the individual concerned or another individual, or (iii) serious bodily harm to another individual;
- May harm or interfere with law enforcement activities and other investigative or regulatory functions of a body authorized by law to perform such functions; or
- May be withheld or is requested to be withheld under applicable legislation.

Where information will not or cannot be disclosed, the individual making the request will be provided with the reasons for non-disclosure.

NSC will not charge you for verifying or correcting your information, however, to the extent permitted by applicable law, there may be a minimal charge imposed if you need a copy of records.

12.0 Web Site

Our Internet Service Provider tracks general information about visitors such as the originating site, referring site, time connected, date of connection, frequency of connections, path of pages viewed, browser used, and other connection information that is usually available on most ISP servers from which general usage statistics may be construed. This information is used internally, only in aggregate form, to better serve visitors by helping us to:

- Manage our site;
- Diagnose any technical problems; and
- Improve the content of our Web site.

In browsing the Web, you will encounter a technology known as "cookies". "Cookies" are files or pieces of

information that may be stored in a computer's hard drive when an individual visits a web site. Most Internet browsers are initially set to accept cookies. If you do not wish to accept cookies, you can set yours to refuse cookies or to alert you when cookies are being sent.

NSC's Web site does not presently use cookies.

In order to access and use the members-only portion of the site, members will need to provide certain Personal Information. Such Personal Information will only be used for authenticating access to the members-only portion of the site.

We have no control over the content of third party Web sites that individuals may access through hyperlinks at our Web sites. We encourage everyone to read the privacy policy of every Web site they visit.

13.0 Amendments of our Practices and this Policy

NSC may from time to time review and revise its privacy practices and this Policy Statement. Policy changes will apply to the information collected from the date of the revised Policy Statement as well as to existing information held by NSC. In the event of any amendment, notice will be posted on our website or otherwise communicated to our members, volunteers, and students.

14.0 Resolving Your Privacy Concerns

In the event that you have questions about: (i) access to your Personal Information; (ii) our collection, use, management, or disclosure of Personal Information; or (iii) this Policy; please contact NSC's privacy officer by sending an email to nsc-secretary@nsc.ca or calling 829-6462.