

# **Foothills Philharmonic Society – Privacy Policy**

Version 1 dated August 7, 2019

## **Introduction**

The Foothills Philharmonic Society (the “Society”) is a not for profit society registered under the *Societies Act* RSA 2000 c S-14 in Alberta. The Society manages and safeguards your personal information in accordance with the *Personal Information Protection Act* SA 2003 c P-6.5 (“PIPA”) and other applicable laws.

This policy applies to the Society, including its society members, ensemble members, employees, board directors, musical directors and committee members. It also applies to anyone who interacts with the Society, including those joining our mailing list or purchasing tickets, and any person providing services on behalf of the Society.

## **Personal Information and Personal Employee Information**

Personal information is any information about an identifiable individual, including but not limited to: name, mailing address, email address, date of birth and gender.

Personal employee information is personal information about an employee or volunteer which is collected, used or disclosed solely for the purposes of establishing, maintaining or terminating an employee or volunteer work relationship. The Society is able to collect, use and disclose this information without your consent in order to establish, maintain or terminate such a relationship. Personal employee information can include financial information, used for benefit registration and to pay the employee.

## **Purposes for collection, use and disclosure of personal information**

The Society collects, uses and discloses personal information only for reasonable purposes or as authorized by law. The Society will collect, use and disclose personal information in order to:

- track Society membership status
- enrol an individual in a musical ensemble
- collect fees and dues for participation in Society ensembles and events
- acknowledge our volunteers and members at ensemble concerts and events
- promote events of the Society and other promotional purposes, including the use of images and names on posters and in programs
- determine eligibility for a board or committee position
- administer pay and benefits to employees of the Society
- apply for and comply with any grant requirements/funding bodies
- comply with other applicable laws such as the *Canada Income Tax Act*
- sell tickets for Society events
- provide information on upcoming Society events
- pay employees and vendors for services

## **Collection, use and disclosure of personal employee information**

The Society will collect, use and disclose personal employee information for reasonable purposes as stated above. The Society will obtain consent before or at the time of collection, use or disclosure of that information.

## **Use of service providers outside of Canada**

The Society uses several third-party service providers for data collection and storage. Your personal information is stored as data with these third-party providers and is subject to their privacy policies. Many of our service providers store this information in data centres located outside of Canada, which are subject to the laws of other jurisdictions.

For details on providing consent to allow the Society to use third-party service providers for your data, please see the 'Consent' section below.

## **Consent**

We endeavour to collect personal information directly from our members. If the member is under the age of thirteen (13), the Society will collect personal information from their parents or guardians.

Upon registering for Society membership, a member will be provided with a copy of this Policy. Our purposes for collection, use and disclosure of personal information are therefore given to the member upon registration, when we initially collect information from the member. Prospective members will be able to read and accept the Privacy Policy as they register to become a member. The Privacy Policy will be available on the Society's website for any other parties that may interact with the Society, such as those joining the mailing list and those buying tickets for our events.

## **Safeguarding personal information**

The Society makes reasonable efforts to ensure that personal information is accurate and complete. Individuals should notify the Society if there is a change to their personal information that may affect their relationship with the Society. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible. In some cases we may ask for a written request for correction.

The Society protects personal information in a manner appropriate for the sensitivity of the information. The Society makes reasonable efforts to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

The Society uses appropriate security measures when destroying personal information, including shredding paper records and permanently deleting electronic records.

The Society will retain personal information only as long as is reasonable to fulfill the purposes for which the information was collected, or for legal or business purposes.

For more information on safeguarding personal information, please contact our Director of Technology.

## **Requests for Access to Information**

An individual can make an access to information request under PIPA. This means that an individual can request access to their personal information that is in the custody or control of the Society. That request must be submitted to the Society in writing.

In order to make a request for access, please email the President of the Society. In your request, please provide sufficient information to enable us to identify the information you have requested.

The Society can refuse a request, either in its entirety or part of a request. If the Society refuses a request, or part of a request, the Society will provide reasons for that refusal.

An individual can also make an access request as to how the Society uses and discloses the individual's personal information to parties outside of the organization. An individual can also request that the Society correct any personal information held by the Society about the individual.

Under PIPA, the Society has 45 days to respond to an individual's access request, unless an extension is given. The Society may charge a reasonable fee to process the request. If the request relates to personal employee information, the Society will not charge any fees for the request. The Society will inform the individual of the fees before conducting the search.

## **Questions & complaints**

If you have any questions or concerns regarding the collection, use or disclosure of personal information by the Society, or you would like to request access to your personal information held by the Society, please contact the Society's Director of Technology at: [privacy@foothillsphilharmonic.com](mailto:privacy@foothillsphilharmonic.com).

If you are not satisfied with the Society's collection, use or disclosure of your personal information or its response to your request for information, you can contact:

Office of the Information and Privacy Commissioner of Alberta

Suite 2460, 801-6 Avenue SW

Calgary, AB T2P 3W2

Phone: 403-297-2728

Toll free: 1-888-878-4044

Email: [generalinfo@oipc.ab.ca](mailto:generalinfo@oipc.ab.ca)