



Edmonton Bicycle and Touring Club

Personal Information Protection Policy

Intent

The Personal Information Protection Act (PIPA) came into effect January 1, 2004 and sets the ground rules for how businesses and not for profit organizations in Alberta collect, use and disclose personal information.

The Edmonton Bicycle and Touring Club (EBTC) is committed to maintaining the accuracy, confidentiality and security of its members' personal information as well as allowing members to request access to, and correction of, their personal information. This policy outlines the principles and practices we follow in protecting your personal information.

This policy applies to EBTC and to any person providing services on our behalf. This policy may be obtained from www.bikeclub.ca.

All references in this Policy to "EBTC", "we", "us", "our" and like terms should be interpreted accordingly.

What is personal information?

According to PIPA, personal information means information about an identifiable individual, such as: an individual's name, home address and phone number, age, sex, family status, an identifying number, financial information, etc. Personal information does not include anonymous or non-personal information (i.e., information that cannot be associated with or traced back to a specific individual).

Photographs and videos may be taken but consent will be obtained if the intent of EBTC is to use it for club promotional activities (newsletters, websites, facebook, tradeshow, etc.).

EBTC only collects and maintains personal information that we need for the purposes of providing services to our members.

1 Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the member voluntarily provides his/her personal information for those purposes, we will communicate the purposes for the collection of the personal information either orally, or in writing, before or at the time of collection.
- 1.2 We will only collect member information that is necessary to fulfill the following purposes:
 - 1.2.1 To collect and process membership applications
 - 1.2.2 To send out association membership information, where the member has consented to this
 - 1.2.3 To contact members for volunteer opportunities, where it has been indicated the member is interested in this
 - 1.2.4 To deliver requested products, such as bike jerseys
 - 1.2.5 To promote a safe riding environment for all members
 - 1.2.6 To promote EBTC club activities.

2 Consent

- 2.1 EBTC will obtain member consent to collect, use or disclose personal information (except where as noted in 2.5, we are authorized to do so without consent).
- 2.2 Consent can be provided in writing, electronically or it can be implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the member voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a member is given notice and a reasonable opportunity to opt-out of his or her personal information being used for e-mail updates and the member does not opt out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), members can withhold or withdraw their consent for EBTC to use their personal information in certain ways. A member's decision to withhold or withdraw their consent to certain uses of personal information may restrict EBTC's ability to provide a particular service. If so, we will explain the situation to assist the member in making the decision.
- 2.5 We may collect, use or disclose personal information without the member's knowledge or consent in the following limited circumstances:
 - 2.5.1 When the collection, use or disclosure of personal information is permitted or required by law
 - 2.5.2 In an emergency that threatens a member's life, health or personal security;
 - 2.5.3 When EBTC requires legal advice from a lawyer.

3 Using and Disclosing Personal Information

- 3.1 We will only use or disclose member personal information where necessary to fulfill the purposes identified at the time of collections:
 - 3.1.1 To conduct member surveys in order to enhance the provision of services
 - 3.1.2 To contact our members directly about products and services that may be of interest.
- 3.2 We will not use or disclose member personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell member lists or personal information to other parties.

4 Retaining Personal Information

- 4.1 If we use member personal information to make a decision that directly affects the member, we will retain that personal information for at least one year so that the member has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain member personal information only as long as necessary to fulfill the identified purposes or a legal purpose.

5 Ensuring Accuracy of Personal Information

- 5.1 Will make reasonable efforts to ensure that member personal information is accurate and complete where it may be used to make a decision about the member.
- 5.2 Members may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought. Requests to correct personal information should be forwarded to Privacy.Officer@bikeclub.ca.
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, EBTC will correct/complete as required. If the correction is not done, we will note the member's correction request in the file.

6 Securing Personal Information

- 6.1 We are committed to ensuring the security of member personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal, or similar risks.
- 6.2 The following security measures will be followed to ensure that member personal information is appropriately protected:
 - 6.2.1 The use of user ID's and passwords
 - 6.2.2 Restricting access to personal information as appropriate
- 6.3 We will use appropriate security measures when destroying member's personal information such as: shredding documents, deleting electronically stored information.
- 6.4 We will review and update our security policies and controls at least annually.

7 Providing Members Access to Personal Information

- 7.1 Members have a right to access their personal information, subjected to limited exceptions.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. Requests to correct personal information should be forwarded to Privacy.Officer@bikeclub.ca.
- 7.3 Upon request, EBTC will tell members how EBTC uses their personal information and to whom it has been disclosed, if applicable.
- 7.4 EBTC will make the requested information available within 45 calendar days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 A reasonable fee may be charged for providing access to personal information. The member will be informed of the cost and EBTC will request further direction from the member on whether or not to proceed.
- 7.6 If a request is refused in full or in part, EBTC will notify the member in writing, providing the reason(s) for referral and the recourse available to the member.

8 Questions and Complaints

- 8.1 The Privacy Officer is responsible for ensuring EBTC's compliance with this policy and the Personal Information Protection Act.
- 8.2 Members should direct complaints, concerns or questions regarding EBTC's compliance in writing to the Privacy Officer. Contact information for EBTC's Privacy Officer:

Email: Privacy.Officer@bikeclub.ca
Regular mail: Edmonton Bicycle and Touring Club
P.O. Box 52017
Garneau Postal Stn.
Edmonton, AB Canada
T6G 2T5
Attention: Privacy Officer

- 8.3 If the Privacy Officer is unable to resolve the concern, the member may also write to the Office of the Information and Privacy Commissioner of Alberta, Suite 2460, 801 – 6 Avenue, SW, Calgary AB T2P 3W2 Phone: 1-888-878-4044 Email: generalinfo@oipc.ab.ca