

Kennisis Lake Cottage Owners' Association Privacy Policy

The Kennisis Lake Cottage Owners' Association ("**KLCOA**") values the trust of its members, volunteers and event participants and is committed to protecting the privacy and security of their personal information. **Please read this Privacy Policy carefully.**

1. What is this policy about?

This Privacy Policy describes how KLCOA collects and uses personal information and in what situations such personal information (as defined below) may be disclosed.

It applies to all past, current, and prospective Members (together, the KLCOA "**Members**") as well as non-Members who share personal information with KLCOA in order to participate in community activities organized or sponsored by KLCOA ("**Participants**"). It also applies to any third parties whose information may be provided to KLCOA by Members in connection with the relationship (for example, when providing KLCOA with third-party emergency contact information).

This policy applies to all personal information, in any medium, that is collected, generated, maintained, transmitted, stored, retained, or otherwise used by KLCOA. "**Personal information**" means any information about an identifiable individual. It does not include information that is aggregated and/or anonymized and cannot be associated with an identifiable individual.

KLCOA may amend this policy from time to time. The date of its last amendment is provided as the effective date published with this policy.

2. What personal information about Members and Participants does KLCOA collect and use?

KLCOA may collect and use the following kinds of personal information:

- Contact and demographic information, such as name, email address, home contact information, cottage property address, date of birth, disability status (if required for program planning), and emergency and next of kin contact information;
- Payment confirmation information when Members or Participants purchase or maintain KLCOA memberships, or participate in activities organized or supported by KLCOA;
- In the case of applicants to the KLCOA Board of Directors, employees or volunteers, recruitment-related information such as reference letters, CVs, employment history, educational history, and information needed to conduct a background check; and
- In certain cases, personal information, including opinions, in response to KLCOA survey questionnaires regarding topics of interest to the local community.

3. How does KLCOA collect personal information?

Effective August 20, 2022

KLCOA collects personal information from Members and Participants in several different ways, including:

- Through KLCOA's membership application and renewal process;
- When conducting recruitment activities for Board of Directors positions and when interviewing/screening KLCOA employees, independent contractors or volunteers. We may sometimes collect additional information from third parties, including former employers, professional references, credit reference agencies or other background check agencies;
- Through the registration process for participation in KLCOA sponsored or organized activities;
- By collecting photographs of Members and Participants during events sponsored or organized by KLCOA;
- Through the use of publicly available databases or listings, such as telephone listings or municipal information;
- By conducting surveys or interviews regarding issues of interest to the local community; and
- Through the use of high-level analytics on the KLCOA website and electronic mail messages sent to Members and Participants by KLCOA.

4. How does KLCOA use personal information?

KLCOA uses the personal information that it collects to administer its membership application or renewal process, manage employment or volunteer relationships, manage events and programs organized or sponsored by KLCOA, and to comply with its legal obligations. For instance, KLCOA may use information for the following purposes:

- Membership application and renewal processing such as sending out annual invoices and ensuring payments are processed;
- Administering participation in events organized or sponsored by KLCOA as necessary, such as the Annual General Meeting or other *ad hoc* meetings as required, sailing lessons, swimming lessons, special seasonal events (such as Art on the Dock or Ladies' of the Lake Luncheons), regattas and other community events;
- Recruitment, such as deciding whom to recruit, appoint, or accept as a volunteer, employee or independent contractor, and the scope of an individual's work with KLCOA, and performing background checks;
- KLCOA operations, such as auditing, accounting, operating communications and communications platforms (including social media), the KLCOA website, and project management, including to determine the effectiveness of communication channels and campaigns; and

- Posting pictures or videos of events organized or sponsored by KLCOA on the website, online (for example, the recording of certain meetings may be posted on YouTube for future viewing) or in special publications; and
- Complying with legal and other operational obligations, such as income tax deductions, record-keeping, budgeting, emergency response, and fraud prevention.

5. How does KLCOA disclose personal information?

KLCOA may share personal information with entities that provide services to KLCOA. Some of these service providers may be located outside of Canada. For example, KLCOA may use a third-party payment processor (e.g. PayPal) to ensure when payment is required, there is a safe and secure way of sharing payment information. Note that KLCOA does not store or have access to the details when credit card payments are made through its third-party payment processor. KLCOA's service providers are permitted to use personal information only on instruction from KLCOA and only for the purpose of providing their services to KLCOA. KLCOA also requires that the service providers take appropriate measures to protect the information.

KLCOA may share Member or Participant personal information with third parties where required or permitted by law. For instance, KLCOA will disclose this information to law enforcement authorities, emergency response personnel or other third parties where required to by a law, court order, subpoena, valid demand, search warrant, government investigation, or other legally valid request or inquiry.

KLCOA does not rent, sell, or trade personal information.

6. How does KLCOA store and protect personal information?

KLCOA takes the protection of personal information it safeguards seriously and has put in place appropriate security measures to safeguard this information loss, theft, modification, and unauthorized use or disclosure. For instance, only certain personnel at KLCOA are authorized to view and use personal information collected on behalf of KLCOA. Those individuals are permitted to view and use the information only for the purposes for which it was collected. They are trained on the appropriate handling of this information and are subject to a duty of confidentiality.

Personal information may be stored by outside hosted databases or cloud storage providers. KLCOA requires these entities to maintain this information securely as required by this Privacy Policy and applicable laws.

In some cases, personal information collected or used by KLCOA may be stored outside of Canada. In such cases, the information will be subject to the laws of other jurisdictions and may be available to foreign government authorities under lawful orders and laws applicable in those jurisdictions.

KLCOA retains Member and Participant personal information only for as long as necessary to fulfil the purposes for which it was collected, unless otherwise authorized or required by law. When this information no longer needs to be retained, it will be destroyed, erased, or made anonymous.

7. What happens if personal information changes?

KLCOA makes efforts to ensure that the personal information it holds is as accurate and up-to-date as possible. Members are reminded at the time of membership renewal to notify the KLCOA of any significant changes to important information, such as contact information as it changes over time. Current Members will be asked to verify their demographic information from time to time.

8. Contact information

If you have any questions about this policy or about how KLCOA handles personal information, or would like to request access to your personal information, please contact info@klcoa.org.