

Privacy Policy

In accordance with Pigeon Lake Camper's Associations (PLCA) legislative requirement to meet the provisions of the *Personal Information Protection and Electronic Documents Act* ("PIPEDA") the below Privacy Policy has been provided to inform both members and employees of our obligations and requirements.

A) Privacy Commitment to Members

Protecting the privacy and confidentiality of personal information provided by Members and Employee's is very important to PLCA. Whether transactions with Members are conducted through the internet, over the phone or in person, PLCA's goal is to treat the personal information that Members provide with the utmost respect and in accordance with the following Privacy Policy.

PLCA's Privacy Policy incorporates the 10 principals of fair information practices which include:

1. **Accountability:** Appointing a Privacy Officer who is responsible for ensuring compliance with PIPEDA;
2. **Identifying purpose:** Identifying the reasons for collecting personal information
3. **Consent:** Obtaining the Members consent to use and share personal information
4. **Limiting collection:** Only collecting information that is necessary to provide services or products;
5. **Limiting use and retention:** Only using and keeping personal information for the reason it was intended;
6. **Accuracy:** Ensuring information is correct when it is being relied upon;
7. **Safeguards:** Protecting personal information from theft, loss, unauthorized access, copying etc.;
8. **Openness:** Making PLCA's privacy policy available to Members at any time;
9. **Individual access:** Giving Members access to their personal information when asked; and
10. **Provide recourse:** Having a process for dealing with complaints and privacy breaches.

B) Definition of Personal Information

Personal information is information about an identifiable individual and includes name, address, e-mail address, bank account and similar information. It includes information contained in notes stored electronically or otherwise. It does not include name and business title of an employee.

C) Collecting and Using Information

PLCA uses current information to contact members regarding all Resort issues pertaining to the membership, the individual member and others. Information collected may also be used to process any or all applicable fees as directed by the individual member.

D) Limiting Use of Information

PLCA only keeps information that is required for the administration of the Resort membership. Unless the member consents or PLCA is required by law, this information will not be disclosed for any other purpose than for which it was collected.

PLCA collects personal information:

- To communicate with Members through email, phone or regular post;
- To process all fees as directed by the member; and
- To maintain a current membership list.

E) Consent

All new members are provided a copy of PLCA's Privacy Policy and they agree to the use of their personal information as permitted under the *Personal Information Protection and Electronic Documents Act (PIPEDA)*. Members may refuse consent in relation to part or all of their personal information and may withdraw consent at any time.

Unless required by law, PLCA does not use or disclose Member information for purposes other than those consented to by the Member. It discloses personal information only where this is required to enter/complete transactions or to meet other necessary requirements. Information may be provided to other members, third parties or contractors only with the member's express consent.

F) Protecting Information

PLCA protects all personal information with appropriate safeguards and security measures. A Member's information is retained for the time it is required and for the purpose it is intended.

PLCA protects Members personal information in a number of ways:

- Through its Privacy Policy;
- Training staff about privacy and how to safeguard personal information; and
- Limiting access to Member data on a 'need to know' basis and through security measures such as the use of encryption, passwords and centralizing Member documents at head office

G) Openness

If requested, PLCA will make available the policies and practices about how personal information is managed.

H) Releasing Information

PLCA may provide a Member's information to other persons, but only:

- When it has the consent of the applicable Member to do so;
- When required by a PLCA contractor who has signed a Non-Disclosure Agreement (NDA) (i.e. bookkeeper) to assist in servicing Members accounts; and

- When required or permitted to do so by law.

I) Use of Members' Social Insurance Numbers

PLCA is not required by law to request or record the Member's Social Insurance Number for any reason, therefore does not collect it.

J) Respecting and Responding to Privacy Concerns

PLCA will investigate and respond to Member concerns about any aspect of the handling of personal information. If Members have any questions or concerns regarding this policy or the protection of their personal information, they should be instructed to contact PLCA's Resort Manager who is acting Privacy Officer. If a member is unsatisfied with the response of the Resort Manager, they may contact a member of the Executive Committee for further assistance.

K) Access to Member Information

PLCA employees may have access to Member's records provided that they have a specific need to know in connection with the servicing of a Member's account and to assist Member's with any changes. If requested, PLCA will provide a Member with details of the personal information it has retained about the Member. All PLCA employees are required to sign confidentiality agreements.

Members have the right to access their personal information when permitted by law. This request should be submitted in writing, signed by the Member, to the Resort Manager.

L) Location of Records

Member records are retained in electronic and/or paper format at the office of PLCA:

Pigeon Lake Camper's Association
28 Fire Route #74
Lakehurst, ON K0L 1J0
1-800-651-2047

M) Privacy Officer Duties

PLCA has appointed the Resort Manager as its Privacy Officer, whose job it is to:

- Ensure compliance with the Ten Principles (referenced above) for the Protection of Privacy and other provisions of the PIPEDA,
- Respond to requests for access to and correction of personal information and general issues concerning personal information,
- Work with the Information and Privacy Commissioner in the event of an investigation resulting from a privacy complaint against the organization, and
- Be responsible for managing the necessary changes to PLCA policies and procedures, inquiry and complaint processes so that they conform to the current legislation.

N) Privacy Breaches

A privacy breach occurs when Member's personal information is lost, stolen, used in an unauthorized way, or compromised. Some common examples are:

- Documents with Member information are taken home, lost, or misplaced;
- Personal information about a Member is shared with co-workers or third parties who have no reason to have this information;
- Member documents containing personal information are left on top of desks or in open files at the end of the day;
- USB memory sticks containing Member information are taken home, lost or stolen;
- Member personal information/documents are mailed or emailed to the wrong individual, and
- Use of non-PLCA email to correspond with Member's, especially those that contain personal information.

A privacy breach can be brought to PLCA's attention by a

- Member,
- An individual or organization that received the private information in error; or
- By PLCA employee that was responsible for the breach

When a breach is brought to our attention, it is critical that,

- The breach is reported immediately to the Resort Manager and,
- Steps are taken to deal with the breach.

Failure to report the breach may result in

- Financial consequences to the Member and individuals affected by the breach;
- Identity theft and potential for fraud to occur; and
- Reputational harm to PLCA

O) Member Information

The Member's only Website maintained by PLCA displays its privacy Policy under "Form's and Regulations".

P) Privacy Rights and Obligations

PLCA Responsibilities:

- Ensure Members and employees are aware PLCA has a privacy Policy and policy and provide upon request;
- Obtain express consent for the collection, use and sharing of personal information;
- Only collect what is necessary to provide the services and products, and satisfy

- regulatory requirements;
- Ensure controls are in place to safeguard and protect personal information and training is provided regarding these safety measures; and
 - Allow Members to access their personal information and ensure it is correct when used.

Member Responsibilities:

- Obtain a copy of PLCA's Privacy Policy;
- Ensure information given to PLCA is accurate and updated; and
- Notify PLCA immediately if it appears privacy has been breached.

Q) Training and Review of Effectiveness

Privacy and confidentiality are foundational values within PLCA and are strongly supported within the organizations corporate governance. To ensure that day to day business is carried out with a view to respecting privacy rights, PLCA provides privacy training to its new and existing employees on a regular basis and updates the privacy training required based on policy updates and/or legislative changes.