

# Catchacoma Marina Group Corporation (CMG) Personal Information Protection Policy

CMG is committed to providing members and customers with a high level of service. As providing this service involves the collection, use, retention, and occasional disclosure of personal information, this document has been created to clearly set out CMG's policies regarding personal information, in accordance with the Personal Information Protection and Electronic Documents Act (PIPEDA).

This Policy is meant to inform members and customers of why and how CMG collects, uses and discloses personal information, obtains consent where required, and protects the privacy of personal information.

This Policy outlines the principles and practices CMG will follow in protecting customers' and members' personal information. This privacy commitment includes ensuring the accuracy, confidentiality, and security of personal information and outlines procedures for requesting access to, and correction of, personal information.

A simplified, easy to understand version of the full PIPEDA legislation can be found at; [https://www.priv.gc.ca/information/pub/guide\\_org\\_e.asp](https://www.priv.gc.ca/information/pub/guide_org_e.asp). The complete legislation can be found at; [https://www.priv.gc.ca/leg\\_c/r\\_o\\_p\\_e.asp](https://www.priv.gc.ca/leg_c/r_o_p_e.asp)

## What Type of Information is Covered by PIPEDA:

- **Personal Information** – means information about an identifiable individual (i.e. name, age, home address and phone number, social insurance number, marital status, religion, income, credit history, medical information, education, employment information, credit card or banking information).

## What is Not Covered by PIPEDA:

- A list of information types not covered by PIPEDA is contained in the full PIPEDA legislation. Some examples are; personal information collected by federal government organizations under the Privacy Act, an employee's name, title, business address or telephone number, an individual's collection of personal information used for a greeting card list, etc.

## What is the Privacy Officer:

- **The Privacy Officer** is the individual designated responsible for ensuring that CMG complies with this policy and PIPEDA. The Privacy Officer for CMG is the General Manager. The General Manager can be reached at (705) 657-3354, or [manager@catchacomamarina.com](mailto:manager@catchacomamarina.com).

# CMG PRIVACY POLICY

Revised February, 2016

## Policy 1 – Collecting Personal Information:

- .1 In general, CMG will collect personal information only for purposes that a reasonable person would consider appropriate in the circumstances, or when a customer or member voluntarily provides personal information for those purposes. CMG will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- .2 CMG will only collect customer and member information that is necessary to fulfill the following purposes:
  - To verify identity for the purpose of providing service
  - To identify customer and member needs and preferences
  - To open and manage an account, and to receive payment for services/products
  - To deliver requested products and services

Specifically, CMG will collect ONLY the following information;

- Name, address, phone number(s) - both permanent and seasonal
- Credit card and banking information for payment purposes (see “Securing Personal Information” below)
- Information required by the Membership Agreement and Bylaw (members only)
- Other information required for the delivery of service, with consent where required by PIPEDA.

All CMG staff will be appropriately trained and knowledgeable in the collection and secure handling of personal information, in accordance with this Policy and with PIPEDA.

## Policy 2 – Consent:

- .1 CMG will obtain customer and member consent to collect, use or disclose personal information (except where, as noted below, CMG is authorized to do so without consent). Consent can be provided in person, by phone, by mail or online.
- .2 Consent can be implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and appropriate, and/or the customer or member voluntarily provides personal information for that purpose.

- .3 Consent can also be implied where a customer or member is given notice and a reasonable opportunity to opt-out of his or her personal information being used for customer satisfaction surveys, or similar uses, and the customer or member does not opt-out.
- .4 Subject to certain exceptions (e.g. the personal information is necessary for the performance of a legal obligation), customers and members can withhold or withdraw their consent for CMG to collect or use their personal information in specific ways. The decision to withhold or withdraw consent to the collection or specific uses of personal information may restrict CMG's ability to provide particular services or products. If so, CMG will ensure that the customer or member understands the implications and consequences of withholding or withdrawing consent.

CMG may refuse to provide service if a customer or member does not consent to provide such information if such information required to fulfill an explicitly specified and legitimate purpose.

### **Policy 3 – Using and Disclosing Personal Information:**

- .1 CMG will only use or disclose customer or member personal information where necessary to fulfill the purposes identified at the time of collection, as outlined above.
- .2 CMG will not use or disclose customer or member personal information for any additional purpose unless CMG obtains consent to do so.
- .3 CMG will never sell, share or otherwise distribute customer or member lists or personal information to third parties, except in circumstances outlined in this Policy.
- .4 Notwithstanding any provision in this Policy, CMG may collect, use or disclose personal information without the customer's or member's knowledge or consent in circumstances such as the following:
  - When the collection, use or disclosure of personal information is permitted or required by law;
  - In an emergency that threatens an individual's life, health, or personal security;
  - When the personal information is available from a public source (e.g. a telephone directory);
  - When seeking legal advice;
  - For the purposes of collecting a debt;
  - To protect CMG from fraud;
  - To investigate an anticipated breach of an agreement or a contravention of law
  - If it is clearly in the individual's interest, and consent is not available in a timely manner

A complete list of circumstances that would permit collection or disclosure of personal information without consent or knowledge is available in the full PIPEDA legislation, available at; [https://www.priv.gc.ca/leg\\_c/r\\_o\\_p\\_e.asp](https://www.priv.gc.ca/leg_c/r_o_p_e.asp)

#### **Policy 4 – Retaining Personal Information:**

- .1 CMG will retain customer and member personal information only as long as necessary to fulfill the identified business purposes or a legal obligation. When required, personal information will be disposed of in such manner as to prevent a privacy breach.

#### **Policy 5 – Ensuring Accuracy of Personal Information:**

- .1 CMG will make all reasonable efforts to ensure that customer or member personal information is accurate and complete.
- .2 Customers and members may request corrections to their personal information in order to ensure accuracy and completeness. A request to correct personal information can be made in writing to the Privacy Officer (General Manager) and should provide sufficient detail to identify the personal information and the correction being sought.
- .3 If the personal information is demonstrated to be inaccurate or incomplete, CMG will correct the information as quickly as possible, and not later than 30 days after the request is received, and will advise any third parties where appropriate. CMG may delay correcting the information, with written notice, if;
  - responding to the request within 30 days would unreasonably interfere with the activities of CMG
  - additional time is necessary to conduct consultations
  - if additional time is required to convert personal information to an alternate format

#### **Policy 6 – Securing Personal Information:**

- .1 CMG is committed to ensuring the security of customer and member personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks. This includes such measures as passwording all computers and ensuring that computers are screen-locked when unattended, using encrypted backup protocols, and other measures deemed appropriate. Personal information is never linked to the CMG website.
- .2 When required, personal information will be disposed of in a manner that prevents a privacy breach.
- .3 CMG will periodically review and update its security policies and controls as legislation or technology changes, to ensure ongoing personal information security.

- .4 CMG does not store credit card or banking information in electronic form or online. This information is stored in a locked safe, and only the General Manager and bookkeeper have access to this information.

### **Policy 7 – Customer and Member Access to Personal Information:**

- .1 Customers and Members have a right to access their personal information.
- .2 A request to access personal information can be made in writing to the Privacy Officer (General Manager) and should provide sufficient detail to identify the personal information being sought.
- .3 CMG will make the requested information available, without cost, within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request, such as:
  - responding to the request within 30 days would unreasonably interfere with the activities of CMG
  - additional time is necessary to conduct consultations
  - if additional time is required to convert personal information to an alternate format
- .4 If a request is refused in full or in part, CMG will notify the customer or member in writing, providing the reasons for refusal and the recourse available to the customer or member. More information can be found in the full PIPEDA legislation.

### **Policy 8 – The Role of the Privacy Officer:**

- .1 The Privacy Officer is responsible for ensuring CMG's compliance with this policy and PIPEDA. The Privacy Officer for CMG is the General Manager.
- .2 Customers and Members should direct any complaints, concerns or questions regarding CMG's compliance in writing to the Privacy Officer (General Manager). Further recourse is outlined in the full PIPEDA legislation.

Further information relating to all aspects of this Policy can be found in the full PIPEDA legislation. Online links are listed at the top of this policy document.