



## **Privacy Policy**

### Background Information

#### **What is a Privacy Policy?**

Effective January 1, 2004, The Federal Government fully implemented the *Personal Information Protection and Electronic Documents Act* (PIPEDA). It was passed to inspire consumer confidence in e-commerce activities. The Act is actually more far reaching as it regulates all collection, use and disclosure of personal information by organizations in the course of commercial activities, regardless of whether the personal information was obtained through or is even related to e-commerce.

Under the PIPEDA, organizations may collect, use or disclose personal information produced by an individual in the course of an individual's employment, business or profession without the individual's consent - as long as such collection, use or disclosure is consistent with the purpose for which the information was produced.

#### **What is Personal Information?**

Personal information includes any factual or subjective information, recorded or not about an identifiable individual. This includes information in any form such as a personal e-mail address, age, name, weight, height, ID numbers, credit card numbers, etc. It does not include information normally found on a business card, such as name, title, company, business address, business e-mail address, business telephone or fax number or information that can be found through publicly available information such as the telephone book.

#### **Why does ScotDance Canada need a privacy policy?**

Whether a charity or non-profit organization will be subject to PIPEDA depends on whether these organizations engage in the kind of commercial activities contemplated by the Act. The term Commercial Activity is defined broadly as "any particular transaction, act of conduct or any regular course of conduct that is of a commercial character including the selling, bartering or leasing of donor, membership or other fundraising lists". This includes engaging in single isolated acts of commercial activities by non-commercial organizations (e.g., selling merchandise). Therefore, charities or non-profit organizations engaging in commercial activities that are ancillary to its' primary purposes may be subject to the Act to the extent that those commercial activities involve the collection, use or disclosure of personal information. At this time, the scope of the term commercial activity is still under debate and will undoubtedly be subject to more judicial interpretation in the future.

## **What steps does ScotDance Canada need to take in order to comply?**

Clearly not all of our activities fall under the PIPEDA legislation. But certainly our activities as they relate to any profit making ventures (e.g., SDCCS, Book Sales) would require SDC to comply with the Act. PIPEDA has 10- principles which guide compliance. They are as follows:

1. Accountability: Organizations are accountable for the protection of personal information under their control.
2. Identifying Purposes: The purposes for which the personal information is being collected must be identified during or prior to the collection.
3. Consent: Information must be collected with the knowledge and consent of the individual and for a reasonable purpose.
4. Limiting Collection: The collection of personal information is to be limited to what is necessary for the identified purposes and will be collected by fair and lawful means.
5. Limiting Use, Disclosure, and Retention: Information can only be used and disclosed for the purpose for which it was collected and will be retained only as long as it is necessary to fulfil the purpose.
6. Accuracy: Personal information must be as accurate, complete and up-to-date as possible.
7. Safeguards: Personal information must be protected by adequate safeguards.
8. Openness: Information about an organization's privacy policies and practices is to be readily available.
9. Individual Access: Information must be accessible for review and correction by the individual whose personal information it is, and;
10. Challenging Compliance: Organizations are to provide the means to an individual to challenge an organization's compliance of the above principles.

## **Privacy Policy**

ScotDance Canada believes strongly in protecting your privacy and the confidentiality of your personal information.

### **Why does ScotDance Canada collect, use or disclose personal information?**

SDC is committed to the promotion and recognition of excellence in the field of Scottish Highland Dancing by staging the Canadian Championships; to educate the public through competitions and demonstrations and doing all things incidental and conducive to the attainment of the above objectives.

In order to meet these goals, SDC may collect, use and disclose personal information, when applicable for the following purposes:

- Establishing and maintaining communication regarding membership benefits, upcoming events, programs and services and other opportunities to members and interested parties;
- Responding to inquiries;
- Making decisions about membership applications – assessing eligibility, processing and maintaining membership;
- Marketing and selling SDC products and services;
- Processing credit card payments through third party payment processing, clearing and settlement systems in association with various banks;
- Compiling statistics for analysis of our organization;

SDC does not sell or rent its membership information to any external parties.

### **How do individuals provide SDC with their consent for the collection, use and disclosure of their personal information?**

Individuals may provide personal information expressly through the membership application/renewal, event registration and the purchase of products and services through the third party payment processing systems.

**How long does SDC retain personal information?**

SDC retains personal information only for as long as it is required to fulfill the purposes stated within this policy. Eg. members' contact information being retained only for the duration of their active membership period.

**How accurate is the personal information collected, used and disclosed by SDC?**

Personal information that is collected, used and disclosed by SDC is provided by individuals and is updated by SDC when requested by the individual. If an individual's personal information requires amendment, they may contact their provincial Board of Director or the National Registrar via the SDC website at <http://scotdance.ca/contact/>

**How secure is the personal information stored by SDC?**

SDC is committed to ensuring that personal information is protected from unauthorized access, unintended disclosures or theft. This protection is provided by firewalls in the computer system and passwords to protect databases. SDC uses an authorized third party banking partner for processing of all credit card transactions.

**Contact us:**

If you have further questions or concerns regarding our Privacy Policy, please contact the Risk Management Committee for ScotDance Canada at: [SDCriskmanagement@scotdance.ca](mailto:SDCriskmanagement@scotdance.ca)

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