

Fraser Valley Explorers Winnebago Club

Privacy Policy



INTRODUCTION

The Fraser Valley Explorers Winnebago Club ("FVE" or the "Club") is committed to respecting the privacy of our members, guests, associates and employees. The FVE Privacy Policy (the "Policy") has been developed as a statement of principles and guidelines that governs how the Club collects, uses, discloses, and protects personal information provided by our users. This policy applies to all personal data in the Club's control, whether it is stored and/or processed by a third-party provider.

The Club is committed to maintaining the highest standards with respect to personal information and as such, this policy is subject to review to ensure currency and compliance with British Columbia's Personal Information Protection Act (PIPA), as amended from time to time.

Compliance with this policy is monitored by the Club's Privacy Officer, who can be reached at fvexplorers@gmail.com. Other individuals within the Club may be delegated to act on behalf of the Privacy Officer.

DEFINITIONS

Personal Information – PIPA defines personal information as:

"Information about an identifiable individual and includes employee personal information but does not include contact information or work product information".

Contact Information – Information that allows an individual to be contacted at work. This includes name, position, business telephone number and address, business email and fax for the individual.

Work product information – Information that is prepared or collected by an employee as part of that individual's work responsibilities, but does not include information about an individual who did not prepare or collect the information.

Summarized or aggregated information – Records that have been stripped of information potentially identifying individuals, and which have been manipulated or combined to provide generalized, anonymous information. We may use your Personal Information to generate summarized data for internal use. Your identity and Personal Information will be kept anonymous and will be used for management and planning purposes.

Publicly available information is not considered Personal Information and is therefore not subject to this policy.

THE PERSONAL DATA WE COLLECT

The Club can be expected to collect the following Personal Information with respect to Members, Guests, Associates and Employees:

- a. Personal details such as name, birthdate, gender identification and marital status
- b. Contact details such as address, email, and telephone number
- c. Payment details including credit card or banking information
- d. Authentication credentials including username and IP address
- e. Activities performed by users in their use/performance of service for or on behalf of the Club
- f. Identification details such as photograph, video (surveillance) and biometric data
- g. Occupation, professional and other club associations if voluntarily provided by user

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- h. Emergency contact information
- i. Information regarding guests you bring to the Club
- j. Details on when you register for and/or attend Club events
- k. Personal information such as allergies or medical conditions if voluntarily provided by user

The Club may also collect Personal Information from other sources including pickleball associations, credit bureaus, employers or personal references, or other third parties who represent that they have the right to disclose the information.

HOW WE USE PERSONAL DATA

The Club collects, uses, discloses and protects Personal Information for the following specific purposes:

- a. To verify identity
- b. To review and select prospective Club members
- c. To review and select prospective employees
- d. To maintain a record of all members and guests attending or intending to attend Club events at any given time
- e. To manage ongoing relationships with Managers, Associates and Employees
- f. To enroll a member, guests, associate or employee in a specific program
- g. To maintain accurate membership records
- h. To process membership and other payments
- i. To maintain employment records to ensure accurate salary, benefit, and related information
- j. To monitor and assess employee performance
- k. To facilitate the provision of services necessary for it to maintain and operate the Club as an organization and business in British Columbia
- l. To track member and guest interests for development of new services and for marketing purposes
- m. To comply with requirements established by applicable federal and provincial legislation
- n. To comply with requirements of professional and regulatory bodies including but not limited to WorkSafeBC and the Government of British Columbia, Employment Standards Branch
- o. To provide necessary financial information to accountants, auditors, and other professional advisors as required
- p. Such other reasons as a reasonable person would consider appropriate

The Club does not collect, use or disclose Personal Information other than for the purposes outlined above, save and except as required by law or as such collection, use and/or disclosure is permitted by PIPA without consent. While you are generally required to consent to the collection, use, or disclosure of Personal Information, such consent is not required in certain circumstances, and in such circumstances consent will not be sought.

CONSENT AND ACCOUNTABILITY

Personal data is collected by fair and lawful means. SPC provides notice as to the purpose for which personal data is collected, used, discloses. Upon request, persons collecting Personal Information shall explain the identified purpose(s) or refer you to a designated person within the Club who will explain the purpose(s) for which the Personal Information is collected. SPC assumes no responsibility for obtaining and validating that appropriate consent has been obtained in respect to personal data transferred to our systems/websites/apps by staff, organizations and/or customers.

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By submitting Personal Information to the Club, you agree that the Club may collect, use or disclose your Personal Information in accordance with this Policy and as permitted or required by law. Subject to legal and contractual requirements, you may refuse to withdraw your consent to certain of the identified purposes at any time by contacting the Club's Privacy Officer or selecting to opt-out in the case of app and online services. If you refuse to deliver necessary Personal Information to the Club or if you wish to withdraw your consent, the Club may not be able to continue to provide you with certain services and/or information which may be of value to you; please contact the Club for more information regarding the implications of withdrawing consent.

When personal Information that has been collected is to be used or disclosed for a purpose not previously identified, the new purpose shall be identified prior to use. Unless the new purpose is permitted or required by law, or is implied in the previously granted consent, your consent will be sought and obtained before the Personal Information is put to a new use.

COOKIE NOTICE

Many sites use "cookies" which are small text files that reside on your computer to identify you as a unique user. SPC may use cookies on our website to allow us to, among other things, measure activity and to personalize your experience. For instance, cookies may enable us to remember your viewing preferences without requiring you to re-type a user name and password. Cookies may also allow us to track your status or progress when requesting products, services, or information. We also allow third party cookies on our websites to track the activity on our web pages. These cookies can sometimes be linked to contact information, but this information cannot be viewed by other parties and is not shared.

Other tracking technologies:

Web Beacons – A web beacon is an electronic file on a web page that allows us to count and recognize users who have visited that page. Among other things, a web beacon can be used in HTML-formatted email to determine responses to our communications and measure their effectiveness – for instance, the web beacon can tell if you get an email from us then click on a link in that email to go to our website. You can generally avoid web beacons in email by turning off HTML display and displaying only the text portion of your email. Web beacons may also provide the type of information provided by cookies concerning your use, preferences, and activity on a website.

Web Server Logs – The computers that deliver our web pages to you may record information. For example, a web server log may record the search terms you enter on our websites, the link you clicked to bring you to the web page, your IP address, or cookies that are set on your browser.

Cookies and tracking technologies are used to:

- a. Measure and track activity on our website
- b. Personalize your experience
- c. Remember viewing preferences and assist during registrations and logins
- d. Count and recognize visitors to our website
- e. Perform analytics

If you choose, you can set your browser to reject cookies or you can manually delete individual or all of the cookies on your computer by following your browser's help file directions. However, if your browser is set to reject cookies or you manually delete cookies, you may have some trouble accessing and using

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some of the pages and features that are currently on our website, or that we may put on our website in the future.

THIRD PARTY PROVIDERS

The Club may disclose Personal Information with third parties engaged to assist the Club in providing services or products to Members, Guests, Associates and Employees to carry out one or more of the purposes described above. These services are prohibited from using personal information for any purpose other than to provide this assistance and are required to protect personal information disclosed to them by the Club and to comply with general privacy principles and all applicable privacy laws.

The Club will never disclose, deliver up, rent or sell your Personal Information to any outside organization unless consent to such use is specifically granted in advance of such disclosure.

PROTECTING PERSONAL INFORMATION

In order to protect the confidentiality of Personal Information the Club employs various reasonable security safeguards appropriate to the format and sensitivity of Personal Information. However, because risks such as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction cannot be eliminated, the Club cannot guarantee the security of your information and will not be liable for its release and any consequences of its release.

With the exception of the on-line roster, which is accessible only to members and employees, only the Club's employees with a business need-to-know, or whose duties reasonably so require, are granted access to other Personal Information about Members, Associates and/or Employees.

The Club shall keep Personal Information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where Personal Information has been used to make a decision about a Member, Associate, or Employee, the Club shall retain, for a period of time that is reasonably sufficient, or as required by law, to allow for access by the Member, Associate or employee, either the actual information or the rationale for making the decision, if such access is not in breach of PIPA, this Policy or the Rules.

The Club shall maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to Personal Information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased or made anonymous.

ACCURACY, ACCESSING AND CORRECTING PERSONAL INFORMATION

The Club is dedicated to ensuring that Personal Information it collects is accurate. The Club will make reasonable efforts to ensure that all Personal Information is accurate and complete.

The Club will, upon its receipt of your written request, provide you with a statement detailing the contents of the Personal Information held about you. The Club will further provide you with a summary how that information has been used or disclosed by the Club.

Should you advise that the Club's records are inaccurate, the Club will, on being satisfied that the request for correction is reasonable, amend the Personal Information in the Club's possession.

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In certain situations, the Club may not be able or permitted to provide access to all of the Personal Information that it holds about an individual. For example, the Club may not provide access to information if doing so would likely reveal Personal Information about a third party or could reasonably be expected to threaten the life or security of another individual. The Club may not provide access to information if disclosure would reveal confidential commercial information, if the information is protected by solicitor-client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to employee discipline, Discipline, as that term is used in the Club's Rules, including but not limited to complaints, investigations arising out of complaints, and decisions and consequences of a review and investigation by the Discipline Committee, the investigation of a complaint, breach of an agreement or a contravention of the laws of Canada or a province. In the event that the Club is unable or not permitted to grant access to Personal Information further to a request, the Club will advise why that is so, in writing.

Should you resign from employment with, or from membership with the Club, the Club retains the right to continue to use and disclose your Personal Information in accordance with both the consent you have provided and this Policy.

This Policy may be amended from time to time at the Board's sole discretion. The collection, use and disclosure of your Personal Information will be governed by the then current version of this Policy in effect at such time. Following any amendments to the Policy, a current version of the Policy will be posted on the Club's website as soon as practical.

COMPLIANCE WITH THIS POLICY

The Club shall maintain procedures for addressing and responding to all inquiries or complaints from individuals regarding the Club's handling of Personal Information. The Club's Privacy Officer shall report all complaints in respect of the Club's handling of Personal Information to the Club's Board of Directors within 48 hours of receipt of each such complaint.

The Club shall investigate all complaints concerning compliance with this Policy. If a complaint is found to be justified, the Club shall take appropriate measures to address and/or resolve the complaint including, if necessary, amending this Policy and the Club's procedures should this Policy and the Club's procedures be found, by the Executive Committee, to be deficient in responding to any such complaint should this Policy and/or the Club's procedures be found, by the Executive Committee, to be deficient in responding to any such complaint. An individual who brings such a complaint shall be informed of the outcome of the investigation regarding his or her complaint.

ADDITIONAL INFORMATION

For more information regarding the Policy, please contact the Privacy Officer at fvexplorers@gmail.com

Information is also available from the Office of the Information and Privacy Commissioner of BC at www.oipc.bc.ca.

Find this policy online at <https://www.fraservalleyexplorers.org/privacy-policy/>.