



Toronto Revolver Club Privacy Policy

Version 1.0

Contents

| | |
|--|----|
| 1. Definitions | 3 |
| 2. Purpose | 3 |
| 3. Application of this Policy..... | 3 |
| 4. Obligations | 3 |
| 5. Accountability | 4 |
| 6. Identifying Purposes | 4 |
| 7. What personal Information is collected or stored? | 5 |
| 8. Executive, Officers and Member Access and Use | 5 |
| 9. Website – Online Policy | 7 |
| 10. Consent | 7 |
| 11. Completeness, Retention, Confidentiality, Security | 9 |
| 12. Request by Members | 9 |
| 13. Compliance of Privacy Policy | 10 |
| 14. Revision History | 11 |

Toronto Revolver Club a not-for-profit organization in Ontario and is not governed by the Personal Information Protection and Electronic Documents Act (PIPEDA). This Policy however is based on the standards required by PIPEDA as interpreted by the Toronto Revolver Club.

1. Definitions

The following terms have these meanings in this Policy:

- a) “TRC” – Toronto Revolver Club
- b) “Commercial Activity” – any particular transaction, act or conduct that is of a commercial character.
- c) “Individual” - All categories of membership defined in the TRC’s Bylaws.
- d) “Personal Information” – any information about an individual that relates to the person’s personal characteristics including, but not limited to: name, address, phone numbers, email address, and PAL.
- e) “Stakeholder” – Individuals employed by, or engaged in activities on behalf of, the TRC including: Staff members, volunteers, administrators, committee members, and directors and officers of the TRC.
- f) “Member Register” – a list of members containing name and address information.

2. Purpose

The TRC recognizes Individuals’ right to privacy with respect to their Personal Information. This Policy describes the way that the TRC collects, uses, safeguards, discloses, and disposes of Personal Information.

3. Application of this Policy

This Policy applies to all Stakeholders and Individuals in connection with personal information that is collected, used, or disclosed during TRC activity.

The TRC’s Board of Directors will have the authority to interpret any provision of this Policy that is contradictory, ambiguous, or unclear.

4. Obligations

The TRC is obligated to follow and abide by this policy in all matters involving the collection, use, and disclosure of Personal Information.

The TRC's Stakeholders will not:

- a) Publish, communicate, divulge, or disclose to any unauthorized person, firm, corporation, or third party any Personal Information without the consent of the Individual
- b) Knowingly place themselves in a position where they are under obligation to any organization to disclose Personal Information
- c) In the performance of their official duties, disclose Personal Information to family members, friends, colleagues, or organizations in which their family members, friends, or colleagues have an interest
- d) Derive personal benefit from Personal Information that they have acquired during the course of fulfilling their duties with the TRC
- e) Accept any gift or favour that could be construed as being given in anticipation of, or in recognition for, the disclosure of Personal Information.

5. Accountability

The Privacy Officer is responsible for the implementation of this policy and monitoring information collection and data security and ensuring that all Board of Directors receives appropriate training on privacy issues and their responsibilities. The Privacy Officer also handles personal information access requests and complaints.

The Privacy Officer may be contacted at the following address: Email: membershipsecretary@torontorevolverclub.com

The Privacy Officer will:

- a) Implement procedures to protect personal information
- b) Establish procedures to receive and respond to complaints and inquiries
- c) Record all persons having access to personal information
- d) Ensure any third-party providers abide by this Policy
- e) Train the TRC Board and communicate the TRC's privacy policy to the TRC Members.

6. Identifying Purposes

The TRC may collect Personal Information from Individuals and prospective Individuals for purposes that include but are not limited to:

6.1. Communications

- a) Sending communications in the form of e-news or a newsletter with content related to the TRC programs, events, fundraising, activities, discipline, appeals, and other pertinent information
- b) To establish and maintain a responsible relationship and provide ongoing service and support
- c) Publishing articles, media relations and postings on the TRC's website, displays or posters
- d) Awards, biographies, and media relations
- e) Communication within and between Stakeholders and Individuals
- f) Discipline results.

- g) Checking eligibility status Registration, Database Entry and Monitoring
- h) Registration of programs, events and activities
- i) Technical monitoring, officials training, educational purposes, sport promotion, and media publications Sales, Promotions and Merchandising
- j) Promotion and sale of merchandise
- k) To conduct the T.R.C. Intake Process for potential new members

6.2. General

- k) Medical emergency, emergency contacts or reports relating to medical or emergency issues
- l) Determination of membership demographics and program wants and needs
- m) Managing insurance claims and insurance investigations
- n) Managing CSSA memberships
- o) Compliance with CFO policies and guidelines

7. What personal Information is collected or stored?

Last Name, First Name, Postal Address, Home Phone Number, Cellular Phone Number, Work Phone Number, E-Mail Address, Fob Identifier Number, PAL Number, PAL Expiry Date, Member Since Year, Membership Type, Emergency Contact, Birth Date, Centre Fire Certification Indicator

8. Executive, Officers and Member Access and Use

- a) President
 - a. Has access to all personal information.
 - b. Uses personal contact information to establish and maintain a responsible relationship and provide ongoing service and support to all members. Oversees other Board Members and Officers for quality of personal information and continuity amongst Board Members and Officers.
- b) Vice President
 - a. Has access to individual personal contact information as needed.
 - b. Uses an individual's personal contact information to solicit members to run for the Board and manages disciplinary actions for TRC.
- c) Treasurer
 - a. Has access to membership list and membership status.
 - b. Uses membership list to manage CSSA membership with CSSA.
- d) Membership Secretary & Privacy Officer
 - a. Has access to all personal information.
 - b. Maintains all member personal information for TRC. Provides all Board members with the appropriate member personal information as required by their role. Uses personal contact information to establish and maintain a responsible relationship and provide ongoing service and support to all members and potential members. Uses PAL information to help

members maintain a current PAL, in the way of reminders. Collects survey information from members about wants and needs. Acts as Privacy Office for TRC.

- e) Firearms Safety Officer
 - a. Has no access to any personal information, other than what the member would have provided directly.
- f) Chief Range Officer
 - a. Has no access to any personal information, other than what the member would have provided directly.
- g) Match Director
 - a. Has access to name and email address.
 - b. Uses personal information to send out Match results or advertise upcoming Match activities.
- h) Mentor Facilitator
 - a. Has access to potential new member name and email address.
 - b. Uses potential new member name and email address personal information to facilitate Club Level Safety course and Live Fire Training.
- i) Newsletter Editor
 - a. Has access to name and address personal information for members who receive the newsletter by mail.
 - b. Uses name and address information to mail out newsletter.
- j) Secretary
 - a. Has access to all personal information.
 - b. Annually sends Board members personal information to CFO as per the CFO's Shooting Club Policy. Acts as TRC's archival for records management.
- k) Facilities Manager
 - a. Has no access to any personal information, other than what the member would have provided directly.
- l) Distribution List Manager
 - a. Has access to email address.
 - b. Uses email addresses to maintain distribution lists for TRC.
- m) Member
 - a. Has access to Member Register as per the Not-for-Profit Corporations Act.
 - b. Uses Member Register to;
 - i. An effort to influence the voting of members.
 - ii. Requisitioning a meeting of the members.
 - iii. Another matter relating to the affairs of the TRC.

Provided that consent specifying the use of the Personal Information is obtained from the Individuals or prospective Individuals. TRC's Stakeholders may collect Personal Information from Individuals and prospective Individuals for other purposes.

9. Website – Online Policy

T.R.C. strives to protect the privacy of those who visit, browse, and use the website. The T.R.C. web server does not use tracking cookies or recognize any personal information regarding the identity or e-mail address of visitors to the website and does not collect unsolicited identifying information about those who access the website.

T.R.C. does not rent, sell, or trade mailing lists. If you supply T.R.C. with personal contact information (for example, postal address, e-mail address, telephone number) on-line, you will only receive contact in respect to T.R.C.

10. Consent

By providing Personal Information to the TRC, Individuals are implying their consent to the use of that Personal Information for the purposes identified in the Identifying Purposes section of this Policy.

At the time of the collection of Personal Information and prior to the use or disclose of the Personal Information, the TRC will obtain consent from Individuals by lawful means. The TRC may collect Personal Information without consent when it is reasonable to do so and permitted by law.

In determining whether to obtain written or implied consent, the TRC will take into account the sensitivity of the Personal Information, as well the Individuals' reasonable expectations. Individuals may consent to the collection and specified use of Personal Information in the following ways:

- a) Completing and/or signing an application form
- b) Checking a check box, or selecting an option (such as 'Yes' or 'I agree')
- c) Providing written consent either physically or electronically
- d) Consenting orally in person
- e) Consenting orally over the phone

The disclosure of Personal Information beyond what is required to fulfill the specified purpose of the product or service.

TRC will not, as a condition of providing a product or service, require Individuals to consent to the use, collection, or disclosure of Personal Information beyond what is required to fulfill the specified purpose of the product or service.

An Individual may withdraw consent in writing, at any time, subject to legal or contractual restrictions. The TRC will inform the Individual of the implications of withdrawing consent.

Opt out options;

- a) Members may opt out of receiving the Alibi newsletter. Their personal information will then not be used for this purpose.
- b) Members may opt out of receiving Match results. Their personal information will then not be used for this purpose.

c) Member may opt out of receiving any other correspondence not mentioned in points a & b above. Their personal information will then not be used for this purpose.

d) If members opt out of providing name, address, telephone, PAL number, and PAL expiry date, they will have effectively opted out of being a TRC member.

The TRC will not obtain consent from Individuals who are minors, seriously ill, or mentally incapacitated. Consent from these individuals will be obtained from a parent, legal guardian, or a person having power of attorney.

The TRC is not required to obtain consent for the collection of Personal Information, and may use Personal Information without the Individual's knowledge or consent, only if:

- a) It is clearly in the Individual's interests and the opportunity for obtaining consent is not available in a timely way
- b) Knowledge and consent would compromise the availability or accuracy of the Personal Information and collection is required to investigate a breach of an agreement or a contravention of a federal or provincial law
- c) An emergency threatens a Individual's life, health, or security
- d) The information is publicly available

The TRC may disclose Personal Information without the Individual's knowledge or consent only:

- a) To a lawyer representing the TRC
- b) To collect a debt that the Individual owes to the TRC
- c) To comply with a subpoena, a warrant, or an order made by a court or other body with appropriate jurisdiction
- d) To a government institution that has requested the information and identified its lawful authority, if that government institution indicates that disclosure is for one of the following purposes: enforcing or carrying out an investigation, gathering intelligence relating to any federal, provincial, or foreign law, national security or the conduct of international affairs, or administering any federal or provincial law
- e) To an investigative body named in PIPEDA or a government institution, if the TRC believes the Personal Information concerns a breach of an agreement, contravenes a federal, provincial, or foreign law, or if the TRC suspects the Personal Information relates to national security or the conduct of international affairs
- f) To an investigative body for purposes related to the investigation of a breach of an agreement or a contravention of a federal or provincial law
- g) In an emergency threatening an Individual's life, health, or security (the TRC will inform the Individual of the disclosure)
- h) To an archival institution
- i) 20 years after the individual's death or 100 years after the record was created
- j) If it is publicly available as specified in PIPEDA
- k) If otherwise required by law Accuracy, Retention, and Openness

11. Completeness, Retention, Confidentiality, Security

To minimize the possibility that inappropriate Personal Information may be used to make a decision about a Member, Personal Information will be accurate, complete, and as up to date as is necessary for the purposes for which it will be used.

Personal Information will be retained as long as reasonably necessary to enable participation in the TRC programs, events, and activities, and in order to maintain historical records as may be required by law or by governing organizations. All Board members will destroy or pass on to their successor any personal information they have acquired by nature of their role, after their term expires on the Board.

The TRC's Stakeholders will be made aware of the importance of maintaining the confidentiality of Personal Information and are required to comply with the TRC's Privacy Policy.

Personal Information will be protected against loss or theft, unauthorized access, disclosure, copying, use, or modification by security safeguards appropriate to the sensitivity of the Personal Information.

Personal Information that has been used to make a decision about an Individual will be maintained for a minimum of one year in order to allow the individual the opportunity to access the Personal Information after the decision has been made.

12. Request by Members

The TRC will make the following information available to Individuals upon request:

- a) This Privacy Policy
- b) Any additional documentation that further explains the TRC's Privacy Policy
- c) The name or title, and the address, of the person who is accountable for the TRC's Privacy Policy
- d) The means of gaining access to Personal Information held by the TRC
- e) A description of the type of Personal Information held by the TRC, including a general account of its use
- f) Identification of any third parties to which Personal Information is made available Access

Upon written request, and with assistance from the TRC after confirming the Individual's identity, Individuals may be informed of the existence, use, and disclosure of their Personal Information and will be given access to that Personal Information. Individuals are also entitled to be informed of the source of the Personal Information and provided with an account of third parties to which the Personal Information has been disclosed.

Unless there are reasonable grounds to extend the time limit, requested Personal Information will be disclosed to the Individual, at no cost to the Individual, within thirty (30) days of receipt of the written request.

Individuals may be denied access to their Personal Information if the information:

- a) Is prohibitively costly to provide
- b) Contains references to other individuals
- c) Cannot be disclosed for legal, security, or commercial proprietary purposes
- d) Is subject to solicitor-client privilege or litigation privilege

If the TRC refuses a request for Personal Information, it shall inform the Individual the reasons for the refusal.

13. Compliance of Privacy Policy

Individuals can challenge the TRC for its compliance with this Policy.

Upon receipt of a complaint, the TRC will:

- a) Record the date the complaint is received
- b) Notify the Privacy Officer who will serve in a neutral, unbiased capacity to resolve the complaint;
- c) Acknowledge receipt of the complaint by way of telephone conversation and clarify the nature of the complaint within fourteen (14) days of receipt of the complaint
- a) Appoint an investigator using the TRC's personnel or an independent investigator, who will have the skills necessary to conduct a fair and impartial investigation and will have unfettered access to all file and personnel
- d) Upon completion of the investigation and within forty-five (45) days of receipt of the complaint, the investigator will submit a written report to the TRC
- e) Notify the complainant the outcome of the investigation and any relevant steps taken to rectify the complaint, including any amendments to policies and procedures

The TRC will not dismiss, suspend, demote, discipline, harass, or otherwise disadvantage any TRC Individual or Stakeholder who:

- a) Challenges the TRC for its compliance with this Policy
- b) Refuses to contravene this Policy
- c) Takes precautions not to contravene this Policy; even though said precautions may be in opposition to the regular duties performed by the Individual.

14. Revision History

- Nov 2022 – first version approved by Board