

# FOCA Privacy Policy

## Approved – June 2016

### Introduction

The Federation of Ontario Cottagers' Associations ("FOCA") is committed to respecting your privacy. Our privacy policy ("Privacy Policy") summarizes what personal information we may collect, and how we use, store and disclose this information. This privacy policy is applicable to our Staff, Board of Directors and any other FOCA Volunteers.

By using the FOCA website (the "Site") at <https://foca.on.ca>, or by choosing to submit personal information to FOCA in writing, in person, by email or on social media, you signify your consent to the terms of this Privacy Policy. If you do not agree with any terms of this Privacy Policy, please do not submit any personal information to FOCA.

The FOCA reserves the right to modify this Privacy Policy at any time. We will promptly reflect any such modifications to this Privacy Policy on our Site and will indicate at the top of this page the date this Privacy Policy was last amended. Please periodically review this Privacy Policy so that you know what personal information we collect, how we use it, and with whom we may share it.

### What Information We May Collect

Personal information is defined as any factual or subjective information, recorded or not, about an identifiable individual. Examples are age, name, source of income, home addresses, email and telephone numbers. Personal information does not include the name, title, or business address or telephone number of an employee of an organization.

FOCA will collect Personal Information when you voluntarily provide it through our Site, in writing or by other means. The amount and type of information that FOCA collects is limited only to that which is necessary to fulfill the purposes identified. For example, we may collect Personal Information when you:

- Contact us by e-mail, telephone, mail or other means, or engage with us on social media or;
- Register with FOCA as a member, or ask to receive our newsletter or Elerts;
- Engage with FOCA at an event;
- Register for an event, a contest or another program that we operate;
- Interact with FOCA in a business or partnership manner.

FOCA's Site does not automatically gather your personal information, and you may access our Site anonymously without disclosing your personal data. Any personal information that site visitors voluntarily choose to provide in order to receive free electronic newsletters, participate in periodic polls and surveys and/or to complete any

of our online application forms IS NOT shared with third parties unless stated otherwise. In general, it will be obvious when FOCA is collecting your personal information on our Site, because you will have to fill out a form.

You can choose not to disclose any personal information we may ask you to provide. However, a decision to withhold some personal information can result in our inability to provide you with our services.

### **How Personal Information May be Used**

FOCA is committed to keeping your personal information accurate, confidential, secure and private. Personal Information may be used by FOCA for the purposes for which it was collected, as provided in this Privacy Policy, or for other purposes that are disclosed to you and to which you consent. Personal Information collected online may also be combined with information you have provided to FOCA through other sources, such as written conference registrations, or over the telephone.

For example, we may use your Personal Information to:

- Respond to your questions or inquiries;
- Supply you with requested information on FOCA programs or services;
- Evaluate a proposal that you have submitted to us;
- Register you for a conference or program that you have asked to attend;
- Send you informational or promotional communications that you have agreed to receive;
- Carry out other purposes that are disclosed to you and to which you consent;
- Carry out any other purpose permitted or required by law.

FOCA will not sell or rent your personal information, but we may share your information in the following situations:

- To those suppliers or companies hired to deliver FOCA products or services, for example a shipping company that delivers a package;
- In the case of online payment for membership or programs, you may be asked to submit credit card information for payment on our Site. Credit card transactions are managed by payment processing companies with whom FOCA has partnered. We will not authorize these companies to use the information except for the express purpose for which it was provided;
- If you enrol or renew your Association membership as part of FOCA's online payment processing service for member groups, your Personal information (but no credit card information) will be shared with that Association, in order to confirm you as a member in good standing;
- If you interact with our sponsors or program partners to access offers listed as "members only" or with member-discounts, FOCA may confirm your full name to our third-party partners, including Cade Associates Insurance Brokers, e.g., to confirming member access to the CottageFirst group insurance program.

- We may also use your personal information to investigate security breaches or cooperate with government authorities pursuant to a legal matter. We may disclose your personal information to third parties if we have reason to believe that disclosing such information is necessary to: (i) conduct investigations of possible breaches of law; (ii) identify, contact, or bring legal action against someone who may be violating an agreement they have with us; or (iii) to protect our rights, safety or property;
- We reserve the right to transfer any Personal Information we have about you in the event that we merge with or are acquired by a third party;
- Lastly, we may disclose your Personal Information for any other purpose to which you expressly consent.

### **Cookies and the use of Aggregate Information**

FOCA may collect information in a non-identifying and aggregate form that cannot be personally identified with a specific individual. We also use and disclose data, which does not identify individuals, for statistical purposes to assess, develop and improve FOCA's programs and services, e.g., aggregate responses to member surveys.

FOCA may use "cookies" and other similar devices on our Site to enhance functionality and navigation for our visitors. A cookie is a small text file containing a unique identification number that is transferred from a website to the hard drive of your computer so that the website may identify separate visitors to the site and track users' activities on the website. A cookie will not let a website know any personally identifiable information about you, such as your real name and address. Cookies are only used to track page popularity for statistical purposes and to improve the quality of the site and meet your needs.

Information tracked through these mechanisms may include, but is not limited to: (i) your IP address; (ii) the type of web browser and operating system being used; (iii) the site that the user comes from or leaves the Site for; and (iv) the pages of the Site a user visits. If you wish to disable cookies, refer to your browser help menu to learn how to disable cookies. Please note that if you disable cookies, you may be unable to access some customized features on the Site.

We use this information in the aggregate, and do not link it to your Personal Information. The amount of information that is sent by your web browser depends on the browser and settings you use. Please refer to the instructions provided by your browser if you want to learn more about what information it sends to websites you visit, or how you may change or restrict this.

### **How we Protect Your Information**

All Personal information you provide is protected under the Government of Ontario's Freedom of Information and Protection of Privacy Act. FOCA only collects personal data

with approval, using fair and lawful means, and only uses it for the purpose for which it was collected or as required by law.

FOCA employs a number of safeguards to protect against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification of our technology assets. FOCA protects your Personal Information by maintaining reasonable physical (locked office; secure backup procedures), organizational (limiting access on a “need to know” basis) and technological safeguards (use of passwords and encryption) appropriate to the sensitivity of such Personal information, and designed to protect against unauthorized use, disclosure or access.

FOCA is supportive of the idea of the right of individuals to inspect their data as it appears in FOCA’s lists and have it corrected if found in error or lacking in completeness. We assume that the information that you provide to us is accurate. If at any time your personal information changes, we hope to be informed of it immediately. If you contact us with a request, we will take appropriate steps to update or correct the personal information in our possession that you have previously provided to us.

FOCA does not sell, lease, rent out nor lend out information lists containing personal information. In the event that FOCA considers a request for the use of a list to be beneficial to the membership of FOCA, then FOCA may release it to another agency with the approval of the persons in the list. Agencies wishing access to lists containing personal information have to pay the cost of FOCA seeking approval for its use.

Your personal information will be retained only as long as necessary to fulfill the purposes for which it was collected, and in compliance with any laws surrounding information retention. If all identified purposes for the use of your personal information have been exhausted, we will destroy the information or render it unidentifiable.

### **About consent to receive commercial messages by email**

FOCA complies with “consent” as defined by Canada’s Anti-Spam Legislation (CASL) which came into effect July 1, 2014. CASL defines consent as anyone who agreed to receive commercial messages (e.g., verbal consent at an event, signing up for the email using an online form); has an existing and active relationship (within 2 years of most recent contact) with the organization (e.g., previously registered for an event, is a member); or made an inquiry to the organization within the past two years.

FOCA uses an external email marketing service, such as Constant Contact, to track consent and to send commercial messages to our mailing lists. Our commercial emails comply with the requirements of CASL and include the organization’s address, telephone or email, and an unsubscribe option.