



**Carleton
Archery
Club** Inc.

Carleton Archery Club, Inc., Board Policy

Number	Policy 2024-02
Date Approved	2024-01-20
Date Amended	

Privacy and Information Management Policy

This is a policy of the Board of Directors of Carleton Archery Club, Inc., to set out a policy for privacy as well as information management for information collected during corporate operations. This policy applies to all directors, officers, club officials and members of Carleton Archery Club Inc.

1. Introduction

This *Privacy and Information Management Policy* (the "Policy") sets out the principles and guidelines for the collection, use, retention, and disclosure of personal information by the Carleton Archery Club, Inc., (the "Club"). This policy adopts the *Personal Information Protection and Electronic Documents Act*, SC 2000, c 5 (PIPEDA) and applies to all personal information collected, used, or disclosed by the Club.

2. Definitions

"Personal information" refers to any information about an identifiable individual, including but not limited to their name, email address, student number, or any other information that can be used to identify an individual.

"designated privacy officer" is the Corporate Secretary or if that position is vacant the General Director. If both positions are vacant the Chair is the privacy officer and may assign any officer or director to take over the role.

3. Collection and Use of Personal Information

Consent

The Club will only collect personal information with the knowledge and consent of the individuals. Consent may be express or implied, depending on the circumstances. By becoming a member of the Club, individuals are deemed to provide their consent for the collection, use, and disclosure of their personal information as described in this Policy.

Purpose of Collection

The Club will collect personal information for the following purposes:

- To establish and maintain a membership record for each member;

- As it relates to directors, officers and club officials, to maintain records related to those roles;
- To communicate with members regarding Club activities, events, and updates;
- To process membership applications, renewals, and related transactions;
- To provide educational, training and recreational services related to archery;
- To comply with legal obligations.

Limitation of Collection

The Club will only collect personal information that is necessary for the identified purposes and will not collect information indiscriminately.

Use of Personal Information

The Club will use personal information solely for the purposes for which it was collected, unless consent has been obtained from the individual or as required by law.

4. Protection and Retention of Personal Information

Safeguards

The Club will implement reasonable physical, organizational, and technological security measures to protect personal information against unauthorized access, use, disclosure, or alteration. These safeguards will include, but are not limited to, secure storage, limited access, password protection, and encryption where appropriate.

Retention

The Club will retain personal information for as long as necessary to fulfill the purposes for which it was collected or as required by law. Personal information that is no longer required will be securely destroyed, erased, or made anonymous. The designated privacy officer, or the board may set out a document retention schedule laying out the retention terms for various types of documents.

5. Disclosure of Personal Information

Consent for Disclosure

The Club will not disclose personal information to third parties without the express consent of the individual, except as required by law or as permitted by club bylaws or policies.

Carleton Students

Members who are also Carleton students consent to the disclosure of their name and student number to Carleton University and/or the Carleton University Student's Association to report disciplinary actions as required.

Service Providers

The Club may engage service providers or contractors to assist in the provision of services to members. In such cases, personal information may be shared with these service providers solely for the purpose of providing the agreed-upon services. The Club will enter into agreements with these service providers to ensure they handle personal information in accordance with applicable privacy laws.

We currently use Google, LLC services for communications, web hosting, forms and data storage. We use Square payments, which is provided by Block, Inc., for web and card payment processing. If you choose to engage with us on social media you also acknowledge we are both bound by the platforms' policies. We use Meta Platforms, Inc., services on Facebook (groups) and Instagram, and Reddit (Reddit Inc.). We also use Discord provided by Discord, Inc.

Archery Ontario

The club will provide personal information of members including name, email, address and phone number to the Ontario Association of Archers, Inc., (o/a Archery Ontario [AO]) for the purposes of registering associate members with AO, which is required for all club members who do not hold an individual membership with AO. This is done to support the Club's membership in the sport's governing bodies and ensure proper insurance coverage.

Legal Requirements

The Club may disclose personal information if required to do so by law, court order, or other legal process.

Reciprocation Policy

Information may also be disclosed to third parties under a reciprocation agreement for disciplinary matters. Please see board policy 2024-05 for details.

6. Access and Accuracy of Personal Information

Access

Upon written request to informationaccess@carletonarchery.ca, individuals will be provided with access to their personal information held by the Club. The Club may require sufficient information to verify the identity of the individual making the request before providing access.

Accuracy and Update

The Club will make reasonable efforts to ensure that personal information is accurate, complete, and up to date. Individuals may request corrections or updates to their personal information by contacting the Club's designated privacy officer.

7. Complaints and Inquiries

Individuals may address any inquiries, concerns, or complaints regarding the Club's compliance with this Policy or PIPEDA to the Club's designated privacy officer at informationaccess@carletonarchery.ca. The Club will promptly investigate and respond to all complaints.

8. Amendments to the Policy

The Club reserves the right to amend this Policy from time to time to reflect changes in applicable laws, regulations, or operational practices and requirements. The most recent version of the Policy will be posted on the Club's website.

9. Contact Information

For any questions or concerns regarding this Policy or the Club's privacy practices, please contact:

Carleton Archery Club, Inc.

c/o Corporate Secretary (privacy officer)

informationaccess@carletonarchery.ca