

# Privacy Policy

## Introduction

The Niagara-on-the-Lake Residents' Association (NOTLRA) is a not-for-profit (non-profit) organization with a mandate to represent the interests of the residents in the Town of Niagara-on-the-Lake by enabling members to have an input into the governance of Niagara-on-the-Lake in areas that affect the quality of life for all residents. The NOTLRA works with Municipal and Regional governments and other stakeholders responding to policy, bylaws and practices that affect the residents of Niagara-on-the-Lake.

The Federal Government introduced the Privacy Act in 2004 and the Personal Information Protection and Electronic Documents Act (PIPEDA) in 2015 to protect personal information collected by organizations. While the Fact Sheet issued by the Office of the Privacy Commissioner for Canada indicates that non-profit organizations are exempt from PIPEDA, the Privacy Act specifies no such exemption. It appears that a clearly stated privacy policy would be a good business practice for all organizations.

## Our Privacy Commitment to You

The NOTLRA is committed to keeping your personal information accurate, confidential, secure and private. When you visit our website, contact us, participate in one of our programs, attend an event, or make a donation to support our activities, we are committed to protecting your privacy rights and your personal information.

The NOTLRA privacy policy is based upon the 10 Privacy Principles contained within the Canadian Standards Association (CSA) Model Privacy Code for the Protection of Personal Information and reflects the requirements of applicable legislation including the Privacy and Protection of Electronic Documentation Act (PIPEDA).

This Privacy Policy describes the principles that the NOTLRA will use to protect the privacy of your personal information in its possession. It addresses the reasons why such information is collected, how it is used, how it's confidentially protected and outlines your rights with respect to this information. This privacy policy is applicable to our members.

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, e-mail addresses and/or telephone numbers. Personal information does not include the name, title, or business address or telephone number of an employee of an organization.

# The NOTLRA's Privacy Principles

## 1. Accountability

The NOTLRA is responsible for the protection of your personal information collected through online requests to be added to our mailing and/or newsletter, renewal, program activities and the website. A request by Individuals to be added to our mailing and/or newsletter, will constitute your permission for the NOTLRA to communicate with you via email, phone or by mail where necessary.

The NOTLRA President is designated as the NOTLRA's Privacy Officer and has overall responsibility for the protection of personal information and for the NOTLRA's compliance with this Privacy Policy. He can be reached at [president@notlra.ca](mailto:president@notlra.ca).

The NOTLRA's privacy responsibilities include:

- Documentation of uses of personal information;
- Compliance monitoring; and
- Reporting and dispute resolution

## 2. Identifying Purposes

The NOTLRA will provide a statement to explain the purpose(s) for the collection of your personal information wherever possible, before we ask you to disclose it. We collect personal data when you join the Association, renew your membership or you ask to receive our newsletters or e-mail distributions. We do not disclose your personal information without your consent except when required by a government body or agency, or as permitted by law.

We do not and will not disclose data that does not identify individuals for statistical purposes.

We do not and will not sell personal information we collect.

If you supply us with your contact information, you may hear from us about important information concerning the NOTLRA's activities, Niagara-on-the-Lake community events or offer you an opportunity to participate anonymously in on-line surveys. If you do not wish to receive information of this type, you may

inform our association Secretary by following the instructions located at the bottom of an unwanted e-mail.

You can access our website home page (<http://www.notlra.com>) and browse our site without disclosing your personal data. Any personal information that site visitors voluntarily choose to provide to receive free electronic newsletters, participate anonymously in periodic polls and surveys or complete membership application forms IS NOT shared with third parties. 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. The NOTLRA uses cookies only to keep track of how many people visit the Association's website and how frequently each page is visited. Each individual movement of any user while on the NOTLRA's site cannot be tracked. Cookies are only used to track page popularity for statistical purposes and to improve the quality of the site and meet your needs (for more information on cookies, please check your browser's settings).

Because the NOTLRA wants your website experience to be informational and resourceful, our website also provides several links to third party sites. The NOTLRA assumes no responsibility for the information practices of sites you can access through our site. We encourage you to review each site's privacy policy before disclosing any personally identifiable information.

### **3. Consent and Disclosure**

The only personal information that the NOTLRA collects is with your knowledge and consent. 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. You can withdraw your consent to the collection, use or disclosure of your personal information at any time, subject to any legal requirements and reasonable notice.

### **4. Limiting Collection**

The amount and type of information that the NOTLRA collects is limited only to that which is necessary to fulfill the purposes identified. We ask for your name for identification purposes. We ask for your address to confirm that you are eligible for membership in the Association. We ask for your e-mail address to permit us to communicate Association information to you. We ask for your telephone number for use in the event of malfunction of the e-mail address. The NOTLRA will ask for the information it requires directly from the individual. Personal information will be collected using procedures that are fair, transparent and lawful. You can choose to disclose as much or as little personal information as you are

comfortable with. As noted in Principle 3, a decision to withhold some personal information can prevent us from providing you with our services.

## **5. Limiting Use, Disclosure and Retention**

The NOTLRA will use your personal information only for the purposes for which it was collected. Your information will not be disclosed without your knowledge and consent, unless permitted or required by law. 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.

## **6. Accuracy**

To ensure the reliable delivery of services and information, your personal information will be kept accurate, complete and up to date. The NOTLRA assumes 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.

## **7. Safeguards**

The NOTLRA employs several safeguards to protect your personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Such safeguards include limiting access on a “need to know” basis and use of computer and file passwords.

## **8. Individual Access**

Upon written request to the designated Privacy Officer, ([president@notlra.com](mailto:president@notlra.com)), we will inform you if we hold any personal information about you and provide you with access to this information. If we have any personal information about you, we will also tell you for what purposes it is used, if applicable. You have a right to update any personal information that we hold about you. We will respond to you within thirty (30) days after receipt of your written request or will notify you if a longer period is required by us to fully address your request.

## **10. Challenging Compliance**

If, for any reason, you are concerned about our compliance with our Privacy Policy, you may contact our Privacy Officer by email at [notlra2025@gmail.com](mailto:notlra2025@gmail.com). The policy for receiving individual challenges is the same as that for individual access described above. If you are not satisfied with the way the Privacy Officer has responded to a complaint, you can contact the Privacy Commissioner of Canada.

## **11. Amending the Policy**

The Board may update this Privacy Policy from time to time as provided for in the Constitution. Notice of changes to this Privacy Policy that affect you will be e-mailed to those members who have agreed to accept such e-mails. A new or amended bylaw must be ratified at the next Annual General Meeting (AGM).