



Huntley Curling Club
199 Langstaff Drive
P.O. Box 144 Carp, Ontario K0A 1L0
Phone: 613- 839-3177
Email: info@huntleycurling.ca
Website: <http://www.huntleycurling.ca/>

POLICY

Title/Reference: PRIVACY POLICY

Prepared by: Barry Brown

Approved by the Board: March 20, 2016

The Huntley Curling Club (HCC) is committed to collecting, using and disclosing your personal information responsibly and to maintaining the accuracy, confidentiality, and security of such personal information.

Personal information includes information that tells us specifically who you are, such as your address, telephone number and e-mail address. However, publicly available information, such as a public directory listing of your name, address and telephone number is not considered personal information.

HCC have adopted the following privacy policy that guides how we collect, use and disclose personal information. Our intent is to balance our legitimate business interests in collecting, using, and disclosing your personal information against your reasonable expectations of privacy.

1. Definitions

In this policy:

- a. "Business" means the business of operating the HCC, including its Web site;
- b. "we", "us", "our" refer to the HCC, mailing address at 199 Langstaff Drive, Carp, Ontario K0A 1L0 and/or our website at <http://www.huntleycurling.ca/>.
- c. "Service Provider" a third party responsible for processing of customer payments according to PCI DSS compliance requirements. The Service Provider(s) possess or otherwise store, process, or transmit cardholder data on behalf of the customer. Service Provider(s) are responsible for the security of cardholder data and the security of the customer's cardholder data environment.

2. Collection of Personal Information

Our primary purpose in collecting personal information from you and about you is to ensure the provision of high quality products and/or services. We only collect personal information from and about you that we consider necessary for achieving this purpose and to permit us to conduct the Business diligently. HCC does not maintain or have access to credit card/debit card information used for processing payments; we use a third party Service Provider that is certified for the secure handling and transmission of cardholder data.

3. Use of Your Personal Information

HCC may use the personal information we collect from and about you to:

- a. Confirm your identity and enable us to contact you as required
- b. Ensure the provision of high quality offerings
- c. Establish and maintain communication with you, in order to inform you of our memberships, leagues, events, courses and other services
- d. Assist us in complying with legal and regulatory requirements
- e. Invoice you for products and/or services subject to fees
- f. Collect unpaid accounts
- g. Provide you with information concerning the business operation of the club.

We may also use your personal information as may be described to you at the time of collection. We may compare and review your personal information for errors and omissions and for accuracy. We may use personal information about you, in a non-personally identifiable manner, to improve our marketing and promotional efforts, to improve our content and service/product offerings, and to customize our Web site's content, layout, and services. These uses are to enable us to improve the Business and to tailor the Business to meet your needs.

4. Disclosure of Personal Information

As a matter of policy, we do not sell, rent, or lease any of your personal information to third parties without your explicit consent. However, there are varieties of circumstances where we may need to disclose some of your personal information, including the following:

- a. We may disclose your personal information to an individual, who, in our reasonable judgment, is seeking the information as your agent. For example, we may provide your personal information to your legal representative if we are satisfied that the individual is requesting the information on your behalf.
- b. We may disclose your personal information as may be required by law.
- c. We may aggregate personal information and disclose such information in a non-personally identifiable manner to sponsors/advertisers and other third parties for marketing and promotional purposes.
- d. We prepare a membership directory for the convenience of members. Your name, address, and phone number will appear in the membership directory unless you select not to have it shared or notify us in writing.

5. Control of your password

You are responsible for all actions taken with any user ID and/or password used to access the website. Therefore, we recommend that you not disclose your password to any third parties. If you choose to share your user ID, your password or your personal information with a third party, you are responsible for any actions resulting therefrom. If you lose control of your password, you may lose substantial control over certain personal information. Therefore, if your password has been compromised for any reason, you should immediately change your password

6. Access, Review, Change and Destruction of Your Personal Information

You may access, review and/or change the personal information we have in our files via website entries or by submitting a written request to do so to our Privacy Information Officer at the address below. We ask that you promptly advise us of any changes to your information.

Upon your written request, we will destroy, as soon as reasonably possible and in accordance with our internal policies and applicable law, all personal information that we have in our files about you. Notwithstanding the foregoing, we will retain in our files some personal information in order to enable us to collect any unpaid accounts and/or as may be required by law.

7. Cardholder Data Processing via Service Provider

HCC uses the services of a third party to process credit card/debit card payments under a contract that is signed by a HCC signing authority. HCC's board of directors will review candidate Service Providers (including proper due diligence prior to engagement), their terms, and approve the use of any Service Provider. Approval will be confirmed with a contract that is signed by a HCC Signing Authority. At present the only Service Provider under contract with HCC is Elavon Canada (4576 Yonge St. Suite 200, Toronto, Ontario, M2N 6N4, phone# 866-310-3345). Our contract with our Service Provider includes provisions to:

- a. Access cardholder data, as submitted;
- b. Store, process or transmit cardholder data on our behalf;
- c. Provides a service to help you accept or process a payment;
- d. Provide a service that helps in the protection of cardholder data or the card data environment;
- e. Protect any cardholder data in their possession and/or your cardholder data environment (as appropriate to the services provided) at all times in a PCI DSS compliant manner; and
- f. Confirm service providers' PCI DSS compliance status at least annually.

8. Other Information Collectors (Service Provider)

Except as otherwise expressly included in the Privacy Policy, this document only addresses the collection, use and disclosure of personal information that we collect from and about you. To the extent that you disclose your personal information to other parties, different rules may apply to their collection, use or disclosure of such personal information. Since we do not control the privacy policies of third parties you are subject to the privacy policies of such third parties.

9. Protecting your Privacy

The personal information that is retained by us is kept in a secure environment and we use reasonable procedural and technical safeguards to protect your personal information against loss, theft and unauthorized access or disclosure. While we may employ many different security techniques to protect such data from unauthorized access by users inside and outside the Business, we cannot ensure perfect security, particularly in relation to the Web site.

10. Amendments to This Policy

HCC may amend this Privacy Policy at any time by mailing (through regular mail or email) any amended terms to you or by posting the amended terms on the Web site and at the Huntley Curling Club. All amended terms shall automatically be effective five days after mailing or on the date of posting.

11. Privacy Information Officer Access, Questions, or Concerns

The Privacy Information Officer for the HCC is the membership director (membership@huntleycurling.ca).

If you wish to access, review and/or change your personal information contained in our files or if you have any questions or concerns about our privacy principles outlined above or about our practices, please contact us at:

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