



BRAGG CREEK TRAILS ASSOCIATION (BCT) PERSONAL INFORMATION PROTECTION POLICY

Effective Date: March 22, 2023

Introduction

BCTA protects all personal information collected over the Internet, on its website or mobile app, on the telephone, or through our office.

BCTA's collection, use and disclosure of personal information is governed by Alberta's *Personal Information Protection Act*. BCTA has developed this Policy and related procedures to guide the handling of personal information that BCTA collects, uses and discloses. This Policy has been created to demonstrate BCTA's commitment to protecting the personal information it collects, uses, and discloses in conducting its business. This policy and related procedures are consistent with Alberta's legislation governing personal information protection.

A copy of the *Personal Information Protection Act* and Regulations can be obtained from Alberta King's Printer at: https://www.kings-printer.alberta.ca/570.cfm?frm_isbn=9780779831562&search_by=link.

Personal Information

This Policy deals only with the personal information collected, used and disclosed by BCTA. Personal information means information about an identifiable individual, which includes an individual's name, e-mail address, home address, phone number, and other identifiable information.

The *Personal Information Protection Act* does not apply to your business contact information if the collection, use or disclosure is to enable BCTA to contact you about your business responsibilities and for no other purpose.

Changes to the Privacy Policy

BCTA may change this Policy from time to time. BCTA is not required to notify you of any change to the Policy. Any change to the Policy will be effective once the BCTA posts the updated Policy on its Website. The effective date appears under the heading. It is your responsibility to review the Policy regularly.

Consent

By voluntarily providing personal information, you are deemed to consent to the collection, use and disclosure of that information for the purposes for which it was provided. As required by the *Personal Information Protection Act*, BCTA will not use personal information for any purpose other than that for which it was collected without your consent. Should BCTA wish to use your personal information for a new purpose, consent will be sought for that new use.

Purposes for Collection, Use, and Disclosure of Personal Information

The purpose for which BCTA collects personal information will be for the purposes for which the information was provided. Personal information may be collected for such purposes as:

- administering BCTA's responsibilities under the *Societies Act* regarding membership, Member services, nomination and election of Directors and Director and Member meetings;

- distributing newsletters to subscribers;
- sending out notices and other relevant information;
- informing and registering volunteers and members for BCTA events;
- administering BCTA volunteer programs;
- conducting volunteer training programs and trail days;
- tracking volunteer hours for statistical and health and safety purposes; and
- insuring volunteers with WCG and under BCTA insurance policies.

BCTA Members must provide their contact information for BCTA to comply with its obligations under the *Societies Act*. Members may, at their request, at any time, be removed from any BCTA mailing list except the Member list maintained under the Act.

BCTA volunteers must provide their contact information for BCTA to comply with its obligations under the *Occupational Health and Safety Act*, the *Worker's Compensation Act*, BCTA's Health and Safety Program and its operating agreement with the Alberta Government and Rocky View County.

Limits for Collecting, Using, Disclosing and Keeping Personal Information

BCTA does not collect, use, or disclose the personal information of individuals except when individuals give their express consent or provide the information voluntarily (deemed consent). There may be occasions where more specific personal information is necessary for BCTA to proceed with a request for information, or provide a product or service, for example, in cases of membership or contracts. In such cases, BCTA will describe the information required. In all such cases, BCTA limits the amount and type of information collected to only the personal information necessary to provide the individual with the required information, product, or service.

BCTA will not collect, use, or disclose personal information without an individual's express or deemed consent except under the authority of section 14 (Collection without consent), section 17 (Use without consent) or section 20 (Disclosure without consent) of the *Personal Information Protection Act*.

BCTA retains personal information only as long as it is necessary for the purposes for which it was collected. For example, if personal information is given to register for an event, the personal information will only be used for this event and will then be deleted or destroyed. In some cases, however, legal reporting or retention requirements necessitate that BCTA retains information for a specific time. In general, BCTA retains personal information for a period not longer than seven years, in secure virtual storage.

BCTA does not sell or trade any personal information with third parties. Information may be transferred to third parties where BCTA outsources information processing in the course of its activities or administrative procedures in specific cases. Some personal information collected by BCTA is transferred to our service providers for processing and storage.

BCTA service providers are restricted from using or disclosing personal information transferred to them for any purpose other than the provision of services to BCTA.

Safeguarding Personal Information

Any personal information that BCTA retains is kept in such a manner as always to ensure that it is protected.

BCTA protects the personal information it collects and safeguards that information from risks such as unauthorized access, collection, use, disclosure, copying, modification, disposal, or destruction. BCTA complies with Part 3 Division 2 of the *Personal Information Protection Act* regarding its care of personal information.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while BCTA strives to protect personal information, it cannot ensure or warrant the security of any information transmitted to or received from it electronically. This is especially true for information transmitted via email. BCTA has no way of protecting the information it sends by e-mail. However, once the transmission is received, BCTA makes its best efforts to ensure security. Internally, access to personal information is restricted to employees and volunteers who need access to the information to do their jobs. These employees and volunteers are limited in number, knowledgeable about, and committed to our privacy policies.

Access and correction of Personal Information

BCTA makes every effort to keep personal information as accurate, complete, current, and relevant as necessary for the identified purposes. BCTA does not routinely update personal information.

At an individual's written request, they may access or ask that their personal information be corrected. Access and correction of personal information are dealt with under Part 3 of the *Personal Information and Protection Act*.

To make a request, please send a letter, or email addressed to our Privacy Officer at the address indicated below. In any written request, please include the following information:

- Name
- Contact details – phone, address, and e-mail address
- Organization name (where applicable)
- Nature of the request – access or correction

The request must contain sufficient detail to enable BCTA, with a reasonable effort, to identify the record in its custody or control that is the subject of the information request.

BCTA will reply to requests no later than forty-five days after receipt of the request, or if it cannot respond within this time, the end of an extended period if the time is extended under s. 31 of the Act.

Links to other Websites

BCTA's Website may contain links to other external (non-BCTA administered) websites not covered by this Policy and may be subject to different privacy standards. BCTA assumes no responsibility for the practices, policies, or actions of third parties that operate these websites. You should review the privacy policies of these websites before providing them with personal information.

Notice of Third-Party Service Providers Residing Outside of Canada

BCTA may use MailChimp to manage its e-mail distribution services. Mailchimp operates exclusively in the United States and stores data from BCTA, including personal information, in its US-based datacenters. The Privacy Policy for MailChimp is available at: <https://mailchimp.com/en-ca/about/security>.

BCTA may use Zoom to hold virtual meetings. Zoom operates in the United States and stores data from BCTA, including personal information, in its US-based datacentres. Zoom's privacy policy is available at:

<https://explore.zoom.us/en/privacy/>.

BCTA uses Better Impact to track volunteer hours , manage volunteers, report to the Workers' Compensation Board, and administer its Health and Safety Program. Better Impact's privacy policy is available at: <https://support.betterimpact.com/siteguide/privacy-policy/>.

Accountability

BCTA is accountable for all personal information under its control. BCTA's Privacy Officer is the Executive Director responsible. The Privacy Officer can be reached by:

Email: executivedirector@braggcreektrails.org

Mail: Bragg Creek Trails Association
Box 1379 Bragg Creek, AB T0L 0K0

Any questions about BCTA's collection, use and disclosure of personal information should be directed to the Privacy Officer. In cases where the question concerns an access request, individuals must follow the request process described under section 8: Access and Correction of Personal Information.