



Policy Statement
Privacy Policy

Number 2 - 08

Section Membership

Board Approval February 2024

Content

1. *Philosophy Surrounding Privacy*

Your privacy is important to Craigleith Ski Club (the "**Club**") and we are committed to maintaining the accuracy, confidentiality and security of your personal information. To that end, we have adopted this privacy policy.

This policy explains how the Club collects, uses, discloses and safeguards the personal information provided to us either directly by you or by a third party.

The terms and conditions of this privacy policy apply to all personal information that has already been collected or will be collected in the future.

By providing personal information to us or authorizing a third party to provide your personal information to us, you signify your consent to the Club's collection, use and disclosure of your personal information in accordance with this privacy policy.

For purposes of this privacy policy, "**personal information**" shall mean any information that can identify an individual directly or through other reasonably available means.

2. *Types of Information We Collect*

The following is a description of types of personal information that we may collect.

- (a) For first member, and if applicable, second member and children - full name, address(es), telephone number(s), email address(es), age, date of birth, gender, marital status;
- (b) For first member, and if applicable, second member – occupation, business address, business telephone number, business email address;
- (c) Facial photographs of members;
- (d) Membership status - active or inactive and an explanation of any inactive status;

- (e) Financial and other information relating to each member as may be reasonably required by the Club in order to process payment of monthly statements or provide credit for full or partial payment of Club dues and assessments;
- (f) Financial, medical and/or other information relating to a member as may be reasonably required by the Club in order to assess any request for full or partial exemption from Club dues and assessments that may be requested by or on behalf of that member;
- (g) Club history – date joined, related Club members, volunteer involvement (for example, Committee Member, Board Member), records of participation in Club elections by voting members, other significant information concerning membership, such as changes in status or discipline;
- (h) Personal locker number and location;
- (i) Membership at other Clubs;
- (j) Names of Club members sponsoring or providing references for your membership application;
- (k) Names of guests invited on your behalf;
- (l) Information regarding food and beverage and other financial transactions that you or other members of your family conduct at the Club;
- (m) Information regarding your registration for alpine programs, social events and other activities at the Club;
- (n) Health/medical information (such as allergies or medical conditions) and emergency contact information that we need to be aware of if you are participating in alpine programs;
- (o) Information obtained through use of RFID (radio frequency identification) technology regarding your entry into Club buildings and use of Club lifts;
- (p) Information obtained through video surveillance cameras and live stream webcams, the latter of which may be accessible to anyone through an internet connection;
- (q) Information gathered from surveys of members.

3. Why We Gather Personal Information

At the Club, we gather and use personal information for the following purposes:

- (r) to calculate, invoice and collect payment of members' annual dues and fees, assessments, levies or other Club charges, including for food and beverage transactions and program and event registrations; information regarding

transactions and registrations may also be used to initiate member surveys regarding the particular subject matter;

- (s) to communicate to the membership Club fees, programs, events, reports, updates, policies and other relevant material;
- (t) to publish the Club's roster of members, including address and telephone numbers provided the member has granted permission;
- (u) to provide authorized Club members with information to assist with the recruitment of members for the Board of Directors, Task Forces or Committees;
- (v) to assemble demographic information to assist the Club with annual and long range planning;
- (w) in the case of health/medical information and emergency contact information, to assist in responding to medical and other emergencies;
- (x) in the case of information from RFID technology, primarily to obtain aggregate information concerning the use of Club facilities, but also for security purposes and potentially to restrict access to Club facilities;
- (y) in the case of photographs, to assist staff and other members in identifying you;
- (z) in the case of video surveillance, to assist with safety and security and to better understand how and when Club facilities are being used, which assists with making operational decisions;
- (aa) in the case of member survey information, to assist the Club in understanding member preferences, satisfaction, concerns and expectations and in making decisions regarding Club operations and capital investments.

We also use the information you have provided to us to communicate with you and safeguard your interests. We will send you important notices and respond to any special needs or enquiries you may have. We only use personal information for the purposes that we have disclosed to you. If for any reason your personal information is required to fulfill a different purpose, we will obtain your consent before we proceed.

We may be required by law to disclose information in the case of criminal investigations or court orders or to comply with government tax reporting requirements. Only the information specifically requested will be disclosed and we will take precautions to satisfy ourselves that the authorities that are making the request have legitimate grounds to do so.

There are some situations where we are legally permitted to disclose information such as employing reasonable and legal methods to enforce our rights or to investigate suspicion of illegal activities.

4. How We Collect Personal Information

We may gather personal information from you when you complete a Membership Application, when you visit the Club, when you contact the Club office via telephone, email or in writing, or when you use the Club website, as well as through other means such as RFID technology that are referred to elsewhere in this document. While we try to ensure that every third party who discloses personal information to us has your consent to do so, if you believe that a third party has inappropriately disclosed your personal information to us, please contact that third party. If they do not adequately respond to your inquiries, please let us know immediately.

5. Website and App Governed by this Privacy Policy

The website that is governed by the provisions and practices stated in this privacy policy is www.craigleith.com. The app that is available to Club members is linked directly to the Club website and a log-in is required to use the app. References to the Club website in this privacy policy apply equally to that app.

The website may contain links to other third party sites that are not governed by this privacy policy. Our privacy policy will no longer apply once you leave the website. Additionally, we are not responsible for the privacy practices employed by other third party websites. Therefore, we suggest that you examine the privacy statements of those sites to learn how your information may be collected, used, shared and disclosed.

When you visit our website, information is not collected that could identify you personally unless you choose to provide it voluntarily, use the app or log-in to the member portion of the website. You are welcome to browse the part of the website that does not require log-in at any time anonymously and privately without revealing any personal or financial information about yourself.

When you visit our website, your web browser may send us certain information depending on the browser you use and your privacy and security settings. This information may include your IP address, the name and version of your operating system, the name and version of your web browser, other technical data information, whether you accessed our website from a computer or a mobile device, when you open emails we send you, the date, time, and duration of your visit, and geolocation data. We may also use session replay tools on our website to record your interactions with the website, such as how you move throughout the website and how you engage with our webforms. Web browser data and session replay tools help with system administration, traffic reposting, and auditing. It also helps us better understand who website users are, how they use our products and services, and what we can do to improve the user experience. We may use this information to offer you products and services and to create aggregate statistics. This helps us improve your experience both online and at our resorts.

We may also use "cookies", including pixels, to customize your website user experience by tailoring online content to align with your browsing habits. Cookies are small pieces of data, stored on your hard drive that send us information about your online browsing habits, including login and browsing history, button impressions, and personal preferences. Cookies also tell us under which account a user is logged in to our website and this information helps us protect your information by making sure your personal preferences are only displayed

when you are actually logged in. If you tell the website to “Remember Me” or save your preferences, this information is stored using a cookie. Some cookies are also required to support the functionality of your transaction (e.g., putting items in your shopping cart).

A pixel is a tiny graphic with a unique identifier which is placed in the code of a web page. We may use pixels to count visitors to our website and to monitor the traffic patterns within our website, to deliver or communicate with cookies, to understand how you have come to our site, and to improve site performance. Pixels help us to measure the effectiveness of our content and other offerings.

You can choose to disable cookies using your web browser’s preferences menu. By turning off cookies, we will still be able to track your browsing history during a single visit to one of our websites, however, we will not be able to link your browsing history during each of these visits to you, as you will be considered a new visitor each time you visit one of our websites. Be aware that turning off cookies may disable certain functions on the website and cause it not to function properly.

6. *Our Employees and Your Personal Information*

In the course of daily operations, access to private, sensitive and confidential information is restricted to authorized employees who have a legitimate business purpose and reason for accessing it. For example, when you call us, our designated employees will access your information to verify who you are and to assist you in fulfilling your requests.

As a condition of their employment, employees of the Club who have access to this information are required to abide by the privacy standards we have established. Employees are informed about the importance of privacy and they are prohibited from the disclosure of any member information to unauthorized individuals or parties.

Unauthorized access to and/or disclosure of personal information by an employee of the Club is strictly prohibited. All employees are expected to maintain the confidentiality of personal information at all times and failing to do so will result in appropriate disciplinary measures, which may include dismissal.

7. *How We Safeguard Your Personal Information*

We use industry standard technologies and maintain current security standards to ensure that your personal information is protected against unauthorized access, disclosure, inappropriate alteration or misuse.

Members' contact information as published in the online Club roster or otherwise may only be used by Club members and must not be distributed or copied to outside parties. The Club will not release members' contact information that is not published in the Club roster, or provide contact information other than by publication of the roster, except as required by law.

Information published in the Club roster must not be used for solicitation of any kind.

Electronic and paper-based files are kept in a secured environment with restricted access.

We manage our server environment appropriately and our firewall infrastructure is strictly adhered to. Our security practices are reviewed on a regular basis and we routinely employ current technologies to ensure that the confidentiality and privacy of your information is not compromised.

8. Accessing and Amending Your Information

You have the right to access, verify and amend the information held in your personal files. You may access and verify any of your information by calling the Club office.

To help us keep your personal information up-to-date, we encourage you to amend inaccuracies and make corrections as often as necessary. Despite our efforts, errors sometimes do occur. Should you identify any incorrect or out-of-date information in your file, we will make the proper changes. Where appropriate, we will communicate these changes to other parties who may have unintentionally received incorrect information from us.

9. Questions, Concerns and Complaints

If you have a question about privacy, confidentiality or the personal information handling practices of the Club, our employees or service suppliers, please contact:

Craigleith Ski Club
164 Craigleith Road,
Blue Mountains, Ontario
L9Y 0S4

Attention: Natalie Bennett

Phone: (705) 445-3847 ext. 222
Fax: (705) 444-2234
Email: NatalieBennett@craigleith.com
Website: www.craigleith.com

Before the Club is able to provide you with any information or correct any inaccuracies, however, we may ask you to verify your identity and to provide other details to help us to respond to your request. We will endeavour to respond within an appropriate time frame.

10. Updating this Privacy Policy

Any changes to our privacy policy and information handling practices will be acknowledged in this policy in a timely manner. We may add, modify or remove portions of this policy when we feel it is appropriate to do so. You may determine when this policy was last updated by referring to the date found at the beginning of this policy.