

Toronto Bicycling Network Privacy Policy

Toronto Bicycling Network (TBN) is committed to respecting and protecting your right to privacy. To that end we have designed this Privacy Policy to ensure that our Members' information and affairs are kept in strict confidence.

1. What Is Protected

TBN collects and will protect the information its Members provide through their online profiles. Members' profiles contain information relating to:

- How to contact the Member
- Who to contact in case of an emergency
- The Member's club activity preferences
- The Member's club volunteering preferences
- Statistical and other information

TBN's system grants any Member the ability to set the privacy protection level for all fields of the Member's own profile.

2. Privacy Protection in Canada

This Privacy Policy has been developed to meet:

- The compliance standards established by Canada's Personal Information Protection and Electronic Documents Act (PIPEDA). The *Act* regulates the collection, storage, use and disclosure of personal information by any organization that gathers it in carrying out a commercial activity. Personal information is defined by the Act as "information about identifiable individuals, other than their names and titles, business addresses and listed phone numbers." Note that PIPEDA does not apply to TBN, as it is a not-for-profit organization.
- Canada's Anti-Spam Law (CASL), which helps protect Canadians from electronic spam while ensuring that businesses can continue to compete in the global marketplace.

3. Accountability

To ensure Toronto Bicycling Network remains accountable for the manner in which it uses, collects and discloses Members' personal information, TBN will appoint a Privacy Officer who is accountable for ensuring its compliance with this policy. Questions pertaining to TBN's Privacy Policy or the application of this policy may be directed to the Privacy Officer (privacy@tbn.ca).

4. Identifying Purposes

TBN and its representatives will request and collect by fair and lawful means only the limited personal information needed to deliver services to Members, manage the club, fulfill our obligations to Members, for statistical purposes, and to comply with government legislation.

Once personal information has been collected, TBN will use it only for the purpose for which it was collected, unless required by law or unless an individual gives specific permission for its use for another purpose.

5. Consent

Prior to collecting, using or disclosing any personal information about Members, TBN will obtain the Member's informed consent. TBN will make reasonable efforts to explain to the Member the purpose for which the information will be used or disclosed unless it is self-evident.

Any Member may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice, and may modify data visibility settings. TBN will inform Members of the implications of such a withdrawal.

Any Member may opt-out of receiving club emails (newsletters, event related notification emails) by editing the Member's own user profile.

TBN will not be required to seek consent to collect, use or disclose personal information in the following circumstances:

- Information collected for the detection and prevention of fraud or other contraventions of the law, or for law enforcement or other legal proceedings taken to protect TBN or its Members;
- As required by law;
- If the information is publicly available; or
- In any other circumstance where obtaining consent would be inappropriate.

The Privacy Officer will report any emergency use of personal information to the TBN President, who will report it to the Board of Directors.

6. Limiting Use, Disclosure and Retention of, and access to, Information

TBN will not use or disclose personal information for purposes other than those for which it was collected except with the consent of the individual or as required by law. TBN will adhere to the following practices:

- TBN will keep Members' information and the business Members undertake with us in strict confidence;
- Members information is not sold or otherwise disclosed to anyone outside of TBN;
- Members have control over how we obtain, use and give out information about them;
- TBN will ensure that physical documents containing personal information are properly stored in secure storage. Access is restricted to TBN board members only, with strict guidelines for controlling access to any personal information.
- Personal information contained in an electronic format is accessible only by those individuals who have been provided access by way of a password;
- TBN board members are required to keep the contents of documents they review, and the deliberations of the board and committee meetings, confidential;

- When documents containing personal information are no longer required for the original purpose for which they were obtained, they are shredded or, if in electronic format, deleted;
- Members who allow their membership to lapse, will maintain a profile in our system. Guest riders are given a Contact (non-Member) profile. TBN may periodically communicate membership-generic notifications to lapsed Members and Contacts with the hope of encouraging them to rejoin the club. Lapsed Members and Contacts who wish to have their profiles removed from our system can do so by sending a request to membership@tbn.ca.
- TBN may, from time to time, hire temporary personnel, contractors, or companies to undertake a work project. When this is done, TBN will select the company carefully and confirm that it uses privacy standards comparable to this policy.

7. Accuracy

Members can change or correct any part of their personal information by editing their user profiles.

8. Safeguards

TBN safeguards personal information by taking the following steps:

- TBN will use information technology platforms that enforce security practices that support safeguarding personal information;
- The Privacy Officer will conduct periodic reviews of TBN practices to determine compliance with this policy. The Privacy Officer will make recommendations as necessary to ensure compliance and determine whether any revisions to this policy are required in light of new practices, processes, technologies or other changes.

9. Complaints Process & Challenging Compliance

If an individual is dissatisfied with TBN's handling of personal information or has any concerns regarding TBN's compliance with this policy, the individual may make a formal complaint in printed or electronic form to the Privacy Officer (privacy@tbn.ca). The Privacy Officer shall investigate all complaints received and shall render a decision within 30 days of receiving the complaint. If the complainant is not satisfied with the response of the Privacy Officer, the individual may, within 30 days of receiving the response, address the same complaint in printed or electronic form to the Board of Directors (bod@tbn.ca). The Board will consider the complaint at its next scheduled Board meeting and respond within 30 days of the meeting. Its response will be considered final. If the complaint is found to be justified, TBN will take appropriate measures including, if necessary, amending its policies and practices.

10. Updating This Policy

Toronto Bicycling Network reserves the right to modify or amend this Privacy Policy at any time. Nothing contained herein is intended to create a contract or agreement between Toronto Bicycling Network and any other party. We recommend that you review this Privacy Policy periodically so that you are aware of any changes.

This Privacy Statement was last modified on

Date	Changes
2021/05/03	Initial Version
2021/06/29	Heading numbers were added. No other changes were made.