

## **Privacy Policy – RMC Club of Canada – Toronto Branch**

The Toronto Branch (“the Branch”) of the Royal Military Colleges Club of Canada (“the Club”) does collect some information about individuals that is defined as “personal information” under the Personal Information Protection and Electronic Documents Act. (“the Act”). The Branch respects and follows the requirements of the Personal Information Protection and Electronic Documents Act.

The designated individual responsible for the Branch’s compliance with the Act is the Director responsible for Membership. A means of contacting that person will be listed on the Branch web site, [www.rmclub-toronto.ca](http://www.rmclub-toronto.ca).

In our collection and handling of personal information, we adhere to the 10 principles of the Act. These are:

1) Accountability

The Director responsible for Membership is directly accountable to the Board of Directors of the Branch and its members for the handling of personal information by the Branch. Means of contacting this person will be listed on the Branch web site or by contacting any current Director of the Branch. This person is responsible for the drafting and following of policies and procedures for the handling of personal information, so that these policies may be kept current with both member expectations and applicable laws. They will also brief all Directors of the Branch on the requirements and responsibilities of the Act.

2) Identifying Purposes

The Branch collects various information, including: name, college number, military rank, decorations, class year, college(s) attended, membership status and contact information for all people who it believes live in the boundaries of the Toronto Branch who are or are eligible to become members of the Royal Military Colleges Club of Canada. It also retains contact information for members who reside outside the greater Toronto area but who have requested that the Branch maintain contact with them. This information is collected to allow these people to be contacted by the Branch for the purposes of keeping them current about Branch events, mutual support, solicitation for membership in the Club and other purposes consistent with the purposes of the Club. The Branch will not sell, lend or make this information available to any person or organization other than the Club without the express consent of the person(s) involved.

3) Consent

Contact information provided to any Director of the Branch or to the Club is deemed to have been provided for the purposes of maintaining contact with the Club and its Branches, for stated purposes of the Club. Anyone may request that their personal information be removed from the Branch database, and that information will be removed as quickly as is practical to do so.

4) Limiting collection

The Branch does not collect personal information beyond that which is necessary for communication with its members or potential members.

5) Limiting use, disclosure and retention

The Branch will not disclose personal information to anyone outside of the Board of Directors of the Branch and the Club without the express consent of the individual(s) involved, unless required to by a provision in the Act for law enforcement purposes. Personal information is only retained as long as is consistent with Branch operation. For example, if a member moves out of the Toronto area to another province, the Branch will delete their contact information from the Branch membership database unless the individual specifically requests the Branch to continue to inform them of Branch events. Contact information is shared solely with the Club in order to maintain consistency, accuracy and currency between Branch and Club contact lists.

6) Accuracy

The Branch strives to ensure its database information is as accurate as possible. Anyone who believes there is incorrect information in the Branch database should make the Director responsible for membership aware of this, and they will act accordingly.

7) Safeguards

The Branch will protect personal information from loss or theft using all reasonable means available. The Branch database is kept in electronic form and is password protected. Any printed copy of the information contained therein will be safeguarded by the appropriate Board member and then it will be destroyed when no longer needed.

8) Openness

Branch policies for the collection, use and handling of personal information will be readily available through the Branch web site, or by request to any Director of the Branch.

9) Individual Access

Any individual may request to know if the Branch has personal information about them. The Branch, through the Membership Director, will reply as quickly as practical, but in no longer than 30 days, as required by the Act. The individuals may see what, if any, information the Branch holds about them and may request that that information be corrected or amended. Any dispute will be handled as outlined in the Act.

10) Challenging compliance

All complaints about how the Branch handles personal information will be recorded and dealt with in as expeditiously a manner as possible. Any matter not handled to the satisfaction of the complainant may be brought to the attention of the Branch President for resolution. Should the Branch President be unable to resolve the matter satisfactorily, the complainant may appeal to the Privacy Commissioner of Canada ([www.privcom.gc.ca](http://www.privcom.gc.ca)), as stated in the Act.

Last Amended: 12 July 2006