



Privacy Policy

I. INTRODUCTION

The Naval Association of Canada - Ottawa Branch (NAC-Ottawa) is committed to protecting your privacy and the confidentiality of your personal information in accordance with Canadian Federal and Provincial privacy laws and regulations, including the Personal Information Protection and Electronic Documents Act (PIPEDA), hereafter referred to as the Act. The Act was recently updated (May 2019) and this NAC-O Privacy Policy has been revised accordingly. The policy describes what information NAC-Ottawa may collect about you; how we use your information; how we protect it; and what choices you have on how the information is used.

The NAC-Ottawa Privacy Policy has been established in accordance with the provisions of the Act. It is guided by information developed by the Office of the Privacy Commissioner of Canada (OPC). The OPC is responsible for overseeing compliance with the Act, some aspects of Canada's anti-spam law (CASL) and Canada's Privacy Act. The Privacy Act applies to a person's right to access and correct personal information that the Government of Canada holds about them, and, therefore, does not apply to NAC-Ottawa. The OPC also provides education and guidance on the application of Canada's privacy laws.

The NAC- Ottawa Privacy Policy is consistent with and complementary to the privacy policy of the provider of our membership management services, [Wild Apricot](#). Consistent in that it provides the same provisions on the collection, storage, use and disclosure of personal information that NAC-Ottawa commits to organizationally. Complementary in that, while Wild Apricot is responsible for their handling of that information, the similar commitments of NAC-Ottawa itself in handling that information are confirmed here.

II. DEFINITIONS

Personal Information

This is information about an identifiable individual that is recorded in any form, but does not include the name, title, business address or telephone number of an employee of an organization.

The types of personal information collected can include names, addresses, phone and/or fax numbers (of non-employees), e-mail addresses, and photographs and videos if posted. Information is collected through programs and events registration as well as at the time you offer a donation, request information materials or, volunteer with NAC-Ottawa.

Privacy Officer

The individual appointed to ensure the efficient implementation and administration of privacy legislation. This officer coordinates an organization's response to requests made under the legislation.

Data

Information contained in any form and includes documents, maps, drawings, photographs, videos, letters, vouchers, papers and any other information that is written, photographed, scanned, recorded or stored in any manner, but does not include software or any mechanism that produces records.

Meaningful Consent

Consent is a key element of the Act. Under the Act, organizations are required to obtain meaningful consent for the collection, use and disclosure of personal information. To make consent meaningful, people must understand what they are consenting to provide. It is only considered valid if it is reasonable to expect that those providing meaningful consent understand the nature, purpose and consequences of the collection, and use of the information.

III. GENERAL PRIVACY POLICY

NAC-Ottawa collects and uses personal information in the conduct of activities in support of its members and its objectives as indicated in the articles below. It has implemented technology and security policies to protect the personal data it has under its control from unauthorized access, improper use, alteration, unlawful or accidental destruction and loss. It also protects member's information by requiring all its volunteers and others who have access to, or are associated with the processing of your data, to respect your confidentiality and protect privacy.

Accountability

NAC-Ottawa is responsible for all personal information under its control, including personal information disclosed to third parties for processing. NAC-Ottawa uses contractual means to protect personal information that has been transferred to service providers for processing, such as in data entry.

Why NAC-Ottawa Needs Your Information

NAC-Ottawa collects no personal information unless you choose to provide such information. By giving us your name, address, e-mail etc., you give us permission to contact you with administrative messages relating to your membership. NAC Ottawa needs such information to manage your membership ("workflow" traffic) and this information will be shared with you by our membership management services system on occasion.

You may select this option directly from your personal online profile, or otherwise must advise NAC-Ottawa of your preference to not be contacted. If you prefer to “OPT OUT”, NAC-Ottawa will not contact you on such matters.

How NAC-Ottawa Uses the Information

In general, NAC-Ottawa may use the personal information that you provide as follows:

- To correspond with you as required to manage your membership, confirm registrations and respond to your requests
- To inform you of issues, upcoming events or special offers of interest
- To maintain a limited membership directory that can be viewed by members only. However, all members individually have direct control of the personal information that can be displayed there through their account/profile access
- To track statistics that help us improve our programs and service
- Where required to in accordance with the Laws of Canada and Ontario

Event Registration Information

NAC-Ottawa routinely offers information sessions, events and activities for which individuals are invited to register. The information collected on registration forms for these events is generally taken from standing membership data, maintained and controlled by each member, and used to communicate specific details about the event (e.g. location, timing, background papers, etc.). Attendance lists and badges may be produced on occasion.

Payment Data Collected

NAC-Ottawa does not have access to your credit card information when a transaction is processed on-line. Credit card information collected by our payment partners is encrypted and directly processed for payment approval. We are then advised when the approval is completed to progress internal membership functions.

Should you need NAC-Ottawa to collect your credit card information and act on your behalf, you must provide it in writing (email or other document), with instructions as to what it is to be used for. In such circumstance, NAC-Ottawa only retains your credit card contact information for as long as legally required for auditing purposes, and then destroys it in a secure manner.

Limiting Collection of Personal Information

NAC-Ottawa will only collect personal information by fair and lawful means that are necessary for the purposes identified. The personal information is collected primarily from individuals during membership application and event registration activities.

Data is collected and stored by the provider of our online membership management services (Wild Apricot) in accordance with their [privacy policy](#). Note that they use computer servers to operate the Site that may be located outside of Canada, or the information may pass through jurisdictions outside of Canada. This is as noted in Wild Apricot’s Privacy Policy and under the

terms of their User Agreement that all NAC-Ottawa members must accept when they register. Wild Apricot may also record a computer's Internet Protocol address if needed to identify fraudulent activity.

Limiting Use, Disclosure and Retention of Personal Information

NAC-Ottawa seeks to respect and honour your privacy and communication preferences. This aim is incorporated directly into the NAC-Ottawa membership management system with privacy and email options directly controlled online by members. For instance, members can choose how to receive certain publications, select categories of information about our programs to receive, or participate in surveys. These options can be applied manually by the Membership Director, if preferred, by contacting him by mail or email. Your preferences will be applied to your records and your information will be not used for correspondence from NAC-Ottawa on these issues.

NAC-Ottawa 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 or authorized by law. Personal information will be retained as is necessary for the fulfillment of those purposes.

Obtaining Consent

Consent for the collection of personal information is implied when voluntarily provided in membership applications, renewals, and event registrations. NAC-Ottawa will seek further consent to use/disclose personal information should there be a requirement beyond that associated with routine membership, event, and activity management.

In determining the appropriate form of consent, NAC-Ottawa will consider the sensitivity of the information and people's reasonable expectations in relation to the disclosure of the information.

In addition to the direct control of their personal information available online, an individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice in writing to NAC-Ottawa.

Keeping Personal Information Accurate

NAC-Ottawa makes every reasonable effort to ensure the accuracy and currency of your personal information so that NAC-Ottawa might fulfill the purposes for which it was collected. It is important that members keep the personal information in their membership profiles current. Please update your account or advise us promptly in writing of any changes in your personal information, so that NAC-Ottawa can continue to meet your needs.

Safeguarding Personal Information

NAC-Ottawa will protect personal information against loss or theft as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which the information is held, using the most updated available electronic security safeguards.

All NAC-Ottawa volunteers are bound by a confidentiality agreement to safeguard any personal information they might access in the course of their NAC-Ottawa work.

NAC-Ottawa will protect personal information transferred to third party service providers through contractual measures or other arrangements stipulating the confidentiality of the information, restricting the purposes for which the information is to be used, and prohibiting its disclosure to others.

Being Open about Policies and Procedures

Upon request, individuals are able to acquire information about our policies and procedures, promptly, in a format that is easily understood and at no cost.

Providing Access to Personal Information

All personal information held and used by NAC-Ottawa is available to individual members in the profiles available in their personal online accounts. In the event that online access is not available, NAC-Ottawa will inform individuals of the existence, use and disclosure of their personal information and provide access to that information upon written request. Members with online access to their account profiles will be able to challenge the accuracy and completeness of the information and have it amended as needed.

Changes

Changes may be made on occasion to accommodate privacy issues and keep this policy up-to-date. It shall be reviewed periodically. Your continued use of membership services following the effective date of any changes to these terms shall mean that you have accepted those changes, recognizing your continuing right to control how your personal information is used.

Challenging Compliance

An individual may submit concerns about compliance by NAC-Ottawa with this Policy directly to the NAC-Ottawa Privacy Officer (Howie Smith at: h.smith@lansdowne.com). This shall be submitted in writing and completed as soon as possible after the concern is known.

NAC-Ottawa has implemented internal procedures to receive and respond to complaints or inquiries about its policies and procedures relating to the handling of personal information. NAC-Ottawa will investigate all complaints. If a complaint is found to be justified, it will take appropriate measures, including amending NAC-Ottawa policies and procedures if necessary.

If unable to update your personal information online, please contact the NAC-Ottawa Membership Director at naco.membership@gmail.com.