

# Privacy Policy

---

## **Policy Purpose**

The YMCA of Lethbridge (in this policy referred to as the “YMCA” or the “Association”) respects the right of individuals to the protection of their personal information.

## **Protecting the Privacy of Personal Information**

The YMCA is committed to maintaining the confidentiality, privacy, and accuracy of personal information it collects, uses and discloses about its participants, members, donors, parents/guardians, employees, volunteers and independent contractors.

People are concerned about their ability to exercise a substantial degree of control over the collection, use and disclosure of their personal information.

**Personal information** is information about an identifiable individual.

- Examples of personal information include, but are not limited to, name, address, gender, age, ID numbers, income, racial or ethnic origin, relationship status, employee files, payment or medical/health records, assessments, or evaluations.
- An individual’s name does not need to be attached to the information in order for it to qualify as personal information.
- Personal information does not include name, title, business address, or business phone number of an employee of an organization.

YMCA employees and volunteers, having access to personal information, must follow the ten fair information principles and steps for implementing these principles, in keeping with privacy laws.

## Principle 1 – Accountability

The YMCA is responsible for personal information under its control and shall designate an individual (Privacy Officer) or individuals who are accountable for YMCA compliance with established privacy principles.

Directors are responsible for and shall oversee compliance by their employees with YMCA privacy protection procedure and fair information principles, to ensure:

- Purposes are defined for collection of personal information;
- Consents are obtained;
- Collection, use and disclosure of personal information is limited;
- Information used is accurate, complete and up-to-date;
- Adequate safeguards protect personal information in YMCA's control;
- Retention and destruction timetables are maintained;
- Access requests by individuals are processed promptly;
- Timely response is provided to an inquiry or complaint regarding YMCA handling of personal information;
- Contracts with third parties that process YMCA information shall include privacy protection requirements.

Managers are responsible for the day-to-day collection, processing and safeguarding of personal information under their control. Coordinators and Managers shall inform and train employees and volunteers having access to personal information on YMCA privacy protection procedure and information handling practices.

Employees and relevant volunteers shall follow the privacy protection procedures established by the YMCA when collecting, using, disclosing, and safeguarding personal information. The Association shall continually assess whether and in what manner the Association communicates to its members and to the public the purposes for which personal information is collected and how the Association's collection of such information is limited.

Employees and volunteers shall make known, upon request, the contact information for the respective Director to whom inquiries or complaints can be forwarded. The Privacy Officer will provide assistance when a more detailed knowledge of the organization's responsibilities is required.

The contact information of the Privacy Officer for the YMCA of Lethbridge CEO.

## Principle 2 - Identifying Purposes

The YMCA shall identify the purposes for collecting personal information before or at the time personal information is collected.

The YMCA needs to collect, use, and disclose some information about its members, participants, parents/guardians, donors, employees, and volunteers, in order to conduct its operations and deliver YMCA programs and services to the communities it serves.

The YMCA's purposes for collecting personal information are:

- To establish and maintain responsible relationships with its members, participants, parents/guardians, donors, employees, and volunteers;

- To manage, develop, and enhance YMCA operations, programs, and services;
- To acknowledge gifts, issue tax receipts, and other administrative requirements including information requests;
- To process and collect fees for service;
- To assess participant needs;
- To determine program, service, employment, or volunteer eligibility;
- To provide safe and secure YMCA environments;
- To collect data for statistical purposes;
- To better understand the changing needs of communities we serve;
- To communicate a range of programs, services, and philanthropic opportunities that benefit people we serve;
- To meet legal, regulatory, and contractual requirements.

The YMCA shall indicate either orally, electronically, or in writing, at or before the time personal information is collected, the purpose for which it is being collected.

Employees and volunteers collecting personal information shall use reasonable efforts to explain identified purposes, or refer the individual to a supervisor who shall explain the identified purposes for collecting personal information.

Unless required by law, employees and volunteers shall not use or disclose for any new purpose personal information that has been collected, without the consent of the individual. Employees shall advise their Director of a potential new identified purpose. Any new identified purpose must be approved by a Director, documented, and consent obtained from individuals prior to YMCA use or disclosure.

### Principle 3 - Consent

The knowledge and consent of an individual is required for the collection, use, or disclosure of personal information, except where not required by law (see Exceptions).

In obtaining consent, employees and volunteers shall advise participants, members, parents/guardians, donors, employees, volunteers, and independent contractors of identified purposes for which personal information will be used or disclosed. Purposes shall be communicated in clear, understandable language.

The YMCA takes into account the sensitivity of the personal information when determining what form of consent is appropriate for the circumstances.

In general, the following actions by an individual constitute implied consent for the YMCA to collect, use,

and disclose personal information for purposes identified to the individual:

- registration for YMCA programs and services;
- completion of a donation pledge form;
- acceptance of employment and benefits enrolment by an employee;
- acceptance of a volunteer position.

For most YMCA employment and community service programs, the YMCA is obligated by its contract with the government to obtain the express written consent from a participant to collect, use, and disclose their personal information.

Express consent is required from an individual when dealing with more sensitive information, such as financial, criminal, and medical data. Coordinators should speak with their Director for more information about when express consent is required in a program or service area.

Individuals may at any time withdraw their consent to the YMCA's use or disclosure of their personal information, subject to certain service, legal, or contractual restrictions. Individuals wishing to withdraw consent may contact the YMCA for more information regarding the implications of withdrawing consent.

### **Exceptions to consent**

YMCA may collect, use, or disclose personal information without prior knowledge or consent of the individual in the following limited circumstances:

- To a lawyer or other legal representative of the YMCA, when legal advice is required by the organization;
- Where consent for the collection, use or disclosure is implied in accordance with the above;
- To a government body or agency in certain circumstances;
- To collect a debt, or comply with a subpoena, warrant, or other court order, or as may be otherwise required by law;
- When the collection, use, or disclosure of personal information is permitted or required by law;
- When the personal information is available from a public source (e.g., a telephone directory);
- In an emergency that threatens an individual's life, health, or personal security;
- To investigate an anticipated breach of an agreement or a contravention of law;
- To protect the YMCA from fraud;

## Principle 4 - Limiting Collection

The YMCA shall limit the collection of personal information to that which is necessary for the purposes identified by the YMCA. Information shall be collected by fair and lawful means.

When collecting personal information, employees and volunteers will usually collect it directly from the individuals about whom the personal information pertains.

Personal information may be collected from other sources with prior consent from the individual, for example, from prior employers, personal references or from other third parties having the right to disclose the information.

## Principle 5 - Limiting Use, Disclosure, and Retention

The YMCA shall 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. Personal information shall be retained for at least a year and after which for only as long as necessary for the fulfillment of those purposes.

In certain circumstances personal information can be collected, used or disclosed without the knowledge and consent of the individual. See Exceptions above under Principle 3 - Consent.

Personal information used to make a decision that directly affects an individual must be retained for at least one year, after which it shall be retained only as long as necessary for the fulfillment of those purposes for which it was collected, or as required by law, or by contract with a funding partner.

Depending on the circumstances, where personal information has been used to make a decision about an individual, the YMCA shall retain, for a period of time that is reasonably sufficient to allow for access by the individual, either the actual information, or the rationale for making the decision.

Coordinators shall maintain schedules for records retention and destruction, which apply to personal information that is no longer necessary or relevant for the identified purposes for collection, or required to be retained by law or under contract. Such information shall be destroyed, erased or rendered anonymous.

## Principle 6 - Accuracy

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

Personal information used by the YMCA shall be sufficiently accurate, complete, and up-to-date to minimize the possibility that inaccurate information is being used to make a decision about an individual.

If employees and volunteers are aware of any inaccuracy or changes in their personal information that the YMCA holds about them, they should notify the YMCA. Employees should notify payroll; volunteers should notify the volunteer coordinator.

Employees handling personal information shall update personal information about participants, members, parents/guardians, donors, employees, volunteers, and independent contractors, as and when necessary.

### Principle 7 - Safeguards

The YMCA shall protect personal information by security safeguards appropriate to the sensitivity of the information.

All employees and volunteers, with access to information, shall be required, as a condition of employment or volunteer role, to respect the confidentiality of personal information.

Employees shall protect personal information in their control (regardless of format) against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification, or destruction, through appropriate security safeguards.

Safeguards may include physical measures (such as locked doors, locked file cabinets), organizational measures (such as staff training, limited access, and security clearances) and technological measures (such as passwords, anti-virus software for computer systems).

Personal information shared with a third party for processing shall be protected through contractual agreements with requirements for confidentiality and appropriate safeguards.

### Principle 8 - Openness

The YMCA shall make readily available to individuals' information about its procedures and practices relating to the management of personal information.

Information on the YMCA's commitment to privacy is available to the public on the YMCA's web site in the menu options at <http://www.lethbridgeymca.ca>

Employees and volunteers shall make known upon request the contact information for the Privacy Officer.

### Principle 9 - Individual Access

The YMCA shall upon request inform an individual of the existence, use, and disclosure of his or her personal information and shall give the individual access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Employees and volunteers shall refer requests about personal information held about an individual to a Director.

Employees shall immediately inform their supervisor or Director of a request for access by an individual to his or her personal information collected by the YMCA. The Director shall respond within thirty (30) days to a written request for individual access by providing access to the individual's data, except in limited circumstances. See Exceptions to Access below.

In order to safeguard personal information, an individual may be required to provide sufficient identification information to permit the YMCA to account for the existence, use, and disclosure of personal information, and authorize access to the individual's file.

The Director shall respond to a written request for access in a reasonable time, and at minimal or no cost. Personal information shall be provided in a format that is understandable, along with any explanation needed to facilitate the individual's understanding.

The Director or designate shall provide the individual a reasonable opportunity to review and challenge the accuracy and completeness of personal information. A statement of disagreement will be attached to records where a requested amendment cannot be made.

Upon request, the Director shall provide an account of the use and disclosure of personal information. A list of organizations to which the YMCA may have disclosed personal information shall be Employees can request access to their employee file by contacting their Director.

### Exceptions to Access

The YMCA may not be able to provide an individual with access to some or all of his or her personal information in certain circumstances permitted by law. Some exceptions include if:

- doing so would likely reveal personal information about a third party;
- disclosure could reasonably be expected to threaten the life or security of another individual;
- information was collected in relation to the investigation of a breach of an agreement, or a contravention of law, or as otherwise permitted by law.

If access to personal information cannot be provided, the Director shall provide the individual with written reasons for denying access.

### Principle 10 – Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated persons accountable for YMCA compliance.

Employees and volunteers shall refer any inquiries or complaints about the YMCA's handling of personal information to Director for response in a fair and timely manner.

Individuals may contact the Director to discuss their question or concern about YMCA information handling practices.

Individuals wishing to make a complaint about YMCA information handling practices shall do so in accordance with the Association's Complaint Policy.

## **Website Privacy Policy**

This Association's web site is owned and operated by YMCA of Lethbridge otherwise known as the "Lethbridge YMCA" or "The YMCA of Lethbridge" inclusively. The web site is maintained and operated in accordance with the requirements of this Privacy Policy.

### **Purpose**

The YMCA is committed to protecting the personal information of individuals who visit this web site by following responsible information handling practices in keeping with privacy laws.

Users can access this site's home page and browse the web site without disclosing personal information.

### **Information Sharing**

The YMCA does not sell personal information we collect.

Personal information to anyone else without prior knowledge or consent, except with agents or contractors of YMCA who perform services for us and when required by a government body or agency, or as permitted by law.

### **Personal Information**

We collect personal data that is provided online, or when users access YMCA programs and services, in order to better meet program, service and information needs.

The YMCA will use and disclose data, which does not identify individuals, for statistical purposes to develop and enhance YMCA programs and services.

The YMCA may also collect personal information in order to satisfy legal, government and regulatory obligations.

In the case of donations, personal information is collected to facilitate the recording of the gift. Our on-line donation processing is secure. The security certificate may be viewed by clicking on the security log on the bottom of each secure page. The YMCA of Lethbridge may contact donors with information about programs and services that may be of interest and benefit.

Individuals that supply the YMCA with mailing address or email address may receive notifications with important information about the YMCA programs or services.

Individuals that do not wish to hear about other YMCA programs, services or opportunities, can request to be removed from call lists, mailing lists and email lists at (403) 327-9622 or by contacting the YMCA's office via email at [ymcaadmin@lethbridgeymca.org](mailto:ymcaadmin@lethbridgeymca.org)

### **Confidentiality / Security**

The YMCA maintains physical, electronic and administrative safeguards that are appropriate to the type of personal information we obtain from you.

### **Social Media Policy**

The YMCA of Lethbridge Social Media team works diligently to post accurate, timely, relevant content.

The YMCA encourages our community to share content such as photos and stories of their YMCA experiences. We assume that anyone sharing this user generated content has the right to do so and has permission of the photographed individuals. Please do not post photos you do not have permission to post, including photos of children without the permission of a parent or guardian.

We welcome constructive feedback, but we reserve the right to remove any comments that are inappropriate due to foul language, attacking of a single person or group, unsupported accusations, spam that explicitly promotes a product or service, or for any other reason the YMCA deems to be appropriate in the circumstances. If contact information is available, we will notify comment authors personally to let them know their comments have been removed. We reserve the right to ban repeat offenders.

## **Privacy Questions**

A fundamental tenet of privacy law is that individuals have the right to access their personal information collected and stored by an organization, and to update or remove that information as necessary, subject to any legal restrictions. Individuals that are aware of any inaccuracy or changes in the personal information on file can contact YMCA staff to have information updated.

## **Cookies**

As with most sites, certain non-personal information is recorded by the standard operation of servers (“cookie” technology). Such information is used to provide an enhanced online experience, and may include:

- The name of the ISP from which the Internet was accessed
- The date and time of site access
- The Internet address of the Web site from which our site was entered and sites exited after leaving the YMCA of Lethbridge site
- The YMCA uses this information to measure and monitor the use of its site and to improve its content. The “Cookie Technology” does not personally identify users or extract any information from a user’s computer. Data which would personally identify a user is known only when voluntarily submitted.

## **Online Legal Policy**

The YMCA of Lethbridge website and social media communities were created to be informative. Accordingly, we permit users to download or photocopy material displayed on our site for non-commercial personal use. Any content or graphics extracted from the site must prominently display copyright and other proprietary notices.

## **Terms and Conditions**

The website is owned by the YMCA of Lethbridge. Any images, graphics, multimedia or content is copyrighted by YMCA and may only be used in the manner provided for in these Terms and Conditions. In addition, the site contains names, logos, trademarks, service marks and other intellectual property, which are the property of the YMCA and may not be used for any purpose without the express written consent of the YMCA.

## **Links**

The YMCA Web site may contain links to other Web sites. YMCA is not responsible for the privacy practices of those other Web sites nor do we endorse the materials presented on Web sites that are not owned and operated by YMCA. Visitors are encouraged to review each site’s privacy policy before disclosing any personally identifiable information.

### **Updating of Privacy Policy**

The YMCA regularly reviews its policies and procedures to ensure we remain current with evolving public expectations and changing laws. The information available at [www.lethbridgeymca.ca](http://www.lethbridgeymca.ca) will keep you informed about our organization and our services.

### **Contact Information**

Questions, concerns or complaints relating to the YMCA's privacy policy or the treatment of personal information should be directed in writing to the CEO.