## CANADIAN PROFESSIONAL RODEO ASSOCIATION Personal Information Protection Policy

The Canadian Professional Rodeo Association ("CPRA") is committed to safeguarding the personal information entrusted to us by our members and employees.

We manage your personal information in accordance with Alberta's *Personal Information Protection Act* and other applicable laws.

This policy outlines the principles and practices we follow in protecting your personal information.

This policy applies to and must be followed by the CPRA, its members and employees, and any service provider, as defined under the *Personal Information Protection Act*.

A copy of this policy will be provided to any member, employee, or service provider upon request and is posted to the CPRA's website.

### **MEMBER INFORMATION**

#### What is personal information?

Personal information means information about an identifiable individual in the possession of the CPRA. This includes an individual's name, home address and phone number, age, sex, marital or family status, an identifying number, (except as may be required to be disclosed in accordance with CPRA policies in relation to participation of members in CPRA sponsored rodeos), financial information, educational history, etc.

#### What personal information do we collect?

We collect only the personal information that we need for the purposes of providing services to our members including personal information needed to:

- communicate with members;
- determine eligibility for membership;
- track membership statistics;
- provide information to related organizations necessary for their provision of services to our members (for example, rodeo committees, sponsors and the Canadian Pro Rodeo Sport Medicine Team);
- provide information to the media for purposes of broadcasting information relating to professional rodeo events, but only with the prior consent of members; and
- other purposes related to managing membership information and providing services to members.

We only collect, use and disclose the personal information that is reasonable to meet the above purposes. The following is a non-exhaustive list of personal information that we may collect, use and disclose to meet those purposes:

- contact information such as your name, home address, email address and telephone number;
- demographic information such as your age, gender and CPRA membership class;
- eligibility information such as your citizenship status or immigration status;
- information about standings and event results;
- health information related to injuries sustained from competition or participation in a CPRA rodeo;

information about education background;

- financial information, including banking information and Social Insurance or Social Security Numbers; and
- other personal information reasonably required for managing membership information and providing services to members.

We inform our members, before or at the time of collecting personal information, of the purposes for which we are collecting the information. The only time we don't provide this notification is when a member volunteers information for an obvious purpose (for example, producing a credit card to pay a membership fee when the information will be used only to process the payment).

#### How do we collect personal information?

We normally collect member personal information directly from our members. This is typically done through our New Member Application or annual Membership Renewal Form but may be done through other means as well.

We may collect your information from third party organizations with whom we have a relationship to help those organizations, or the CPRA, provide better services to our members, but only to the extent that you have provided such information to that organization. This includes, but is not limited to, the Canadian Pro Rodeo Sport Medicine Team.

We may also collect your information from other persons with your consent or as authorized by law.

#### Consent

We ask for consent to collect, use or disclose member personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose, such as the New Member Application and Membership Renewal forms.

We assume your consent to continue to use and, where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal

information. Where express consent is needed, we will normally ask members to provide their consent in writing by signing a consent form.

A member may withdraw consent to the use and disclosure of personal information as set forth herein by notice in writing to the CPRA at any time, unless the personal information is necessary for us to fulfil our legal obligations. We will respect your decision, but we may not be able to provide you with certain services if we do not have the personal information or your consent to disclose it.

We may collect, use or disclose member personal information without consent only as authorized by this policy or by law. For example, we may not request consent when the collection, use or disclosure is related to an emergency that threatens life, health or safety.

#### How do we use and disclose personal information?

We use and disclose member personal information only for the purpose for which the information was collected, except as authorized by law. For example, we may use member contact information to contact members regarding annual or special meetings of members, membership renewal and other matters as provided in the By-Laws of the CPRA or the Canada *Not-for-Profit Corporations Act*.

We may disclose your information to third party organizations to help those organizations, or the CPRA, provide better services to our members. This includes, but is not limited to, Rodeo Committees and the Canadian Pro Rodeo Sport Medicine Team.

If we wish to use or disclose your personal information for any new business purpose, we will ask for your consent. In some circumstances we may not seek consent if the law allows us to use or disclose your personal information without your consent.

# **EMPLOYEE INFORMATION**

#### What is personal employee information?

Personal employee information is personal information about an employee or volunteer which is collected, used or disclosed solely for the purposes of establishing, managing or terminating an employment relationship or a volunteer work relationship. Personal employee information may, in some circumstances, include a Social Insurance or Social Security Number, a performance review, etc.

We can collect, use and disclose your personal employee information without your consent only for the purposes of establishing, managing or ending the employment or volunteer relationship. We will provide current employees and volunteers with prior notice about what information we collect, use or disclose and our purpose for doing so.

#### What personal employee information do we collect, use and disclose?

We collect, use and disclose personal employee information to meet the following purposes:

- determining eligibility for employment or volunteer work, including verifying qualifications and references;
- establishing education, training, development and experience requirements;
- assessing performance and managing performance issues if they arise;
- administering pay and benefits (paid employees only);
- processing employee work-related claims (e.g. benefits, workers' compensation, insurance claims) (paid employees only);
- complying with requirements of funding bodies (e.g. lottery grants);
- complying with applicable laws (e.g. Canada *Income Tax Act*, Alberta Employment Standards Code); and
- other purposes related to establishing, managing or ending the employment or volunteer relationship.

We only collect, use and disclose the amount and type of personal employee information that is reasonable to meet the above purposes. The following is a non-exhaustive list of personal employee information that we may collect, use and disclose to meet those purposes:

- contact information such as your name, home address, email address and telephone number;
- criminal background checks;
- employment or volunteer information such as your resume (including educational background, work history and references), reference information and interview notes, letters of offer and acceptance of employment, policy acknowledgement forms, background verification information, workplace performance evaluations, emergency contacts, etc.;
- benefit information such as forms relating to applications or changes to health and insurance benefits including medical and dental care, life insurance, short and long term disability, etc. (paid employees only);
- financial information, such as pay cheque deposit information and tax-related information, including Social Insurance and Social Security Numbers (paid employees only); and
- other personal information required for the purposes of our employment or volunteer relationship.

We will inform our employees and volunteers of any new purpose for which we will collect, use, or disclose personal employee information, or we will obtain your consent, before or at the time the information is collected.

We will obtain your consent to collect, use and disclose your personal information for purposes unrelated to the employment or volunteer relationship.

### What information do we provide for employment/volunteer references?

In some cases, after your employment or volunteer relationship with us ends, we will be contacted by other organizations and asked to provide a reference for you. It is our policy not to disclose personal information about our employees and volunteers to other organizations who request references without consent. The personal information we normally provide in a reference includes:

- confirmation that an individual was an employee or volunteer, including the position, and date range of the employment or volunteering; and
- general information about an individual's job duties and information about the employee or volunteer's ability to perform job duties and success in the employment or volunteer relationship.

We will seek your consent in writing prior to providing the above information to other organizations.

# GENERAL TERMS

#### How do we safeguard personal information?

We make every reasonable effort to ensure that personal information is accurate and complete. We rely on individuals to notify us if there is a change to their personal information that may affect their relationship with the CPRA. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible. In some cases, we may ask for a written request for correction.

We protect personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

We use appropriate security measures when destroying personal information, including shredding paper records and permanently deleting electronic records.

We retain personal information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes.

#### Access to records containing personal information

Individuals have a right to access their own personal information in a record that is in the custody or under the control of the CPRA, subject to some exceptions. For example, organizations are required under the *Personal Information Protection Act* to refuse to provide access to information that would reveal personal information about another individual.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to Denny Phipps, General Manager, at <u>dphipps@rodeocanada.com</u>. You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside the CPRA. In addition, you may request a correction of an error or omission in your personal information.

We will respond to your request within 30 calendar days, unless an extension is granted. We may charge a reasonable fee to provide information, but not to make a correction. We do not charge fees when the request is for personal employee information. We will advise you of any fees that may apply before beginning to process your request.

#### **Questions and complaints**

If you have a question or concern about any collection, use or disclosure of personal information by the CPRA, or about a request for access to your own personal information, please contact Denny Phipps, General Manager, at <u>dphipps@rodeocanada.com</u> or 1-403-945-7375.

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta Suite 2460, 801 - 6 Avenue, SW Calgary, Alberta T2P 3W2 Phone: 403-297-2728 Toll Free: 1-888-878-4044 Email: generalinfo@oipc.ab.ca Website: www.oipc.ab.ca