

Updated on Oct. 2, 2013

Britannia Yacht Club (BYC)

Information Security and Privacy Policy

Purpose:

- To document the information security and privacy policy of BYC; and
- Make this policy available to all members, prospective members, volunteers, BYC Board Advisors, BYC Board of Directors and Committee members.

Definition of Personal Information

BYC adopts the definition of personal information as contained in the Ontario Freedom of Information and Protection of Privacy Act (FIPPA) as at June 22 2012. Personal information means recorded information about an identifiable individual, including:

- information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation or marital or family status of the individual,
- information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved,
- any identifying number, symbol or other particular assigned to the individual,
- the address, telephone number, fingerprints or blood type of the individual,
- the personal opinions or views of the individual except where they relate to another individual,
- correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence,
- the views or opinions of another individual about the individual, and
- the individual's name where it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual; ("renseignements personnels")

Compliance with FIPPA

BYC, as a not-for-profit corporation without shares operating within Ontario, will follow the Ontario FIPPA legislation.

The Ontario FIPPA legislation is publicly available through the Service Ontario's web site at the following link: http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90f31_e.htm

Personal Information Collected by BYC

Member information

The following personal information may be collected by BYC: name, marital status, age, contact information, financial information for the purposes of billing.

Member's personal information will be entered into or maintained in electronic form on a secure computer and/or secure media. Member information will also be retained in hard copy in the physical files of each BYC member.

Members can request, at any time, to see their personally identifiable information that is on file.

Handling of Personal Information

The Club will ask members for permission to collect and hold only the personal information that is necessary for the Club to deliver BYC membership services.

The Club will only use this information in the manner described in this policy.

Member's personal information will not be shared with anyone outside of the Club without permission in advance.

If the Club needs to use personal information for any other purpose, such as providing members with additional services, the Club will seek permission in advance.

Members Communication Program:

Member contact information, such as name, phone number and email address, is available to other Club members. Other types of personal information, such as marital status and financial information will not be shared with Club members without a member's permission.

Member contact information will be shared via a secure page on the Club's website or upon request to the Club office. Club staff will assess each request taking into account the need for member privacy. If there is any doubt, Club staff will err on the side of ensuring member privacy and will contact the member before disclosing their personal information to another member.

Members have the option to be 'anonymous', that is, to instruct BYC to not disclose any personal or contact information to other members of the Club. 'Anonymous' members personal

information will be kept private by BYC in accordance with this policy and may be accessed only by a select few BYC representatives and on a need to know basis, **that is the Commodore, Hon. Secretary, General Manager and the Office Accountant.**

Exception to this policy is when a member chooses to use such electronic media to communicate with a BYC representative. In such a case, the BYC representative will inform the member that the form of communication is not secure and the member is accepting the responsibility and risk for the security and privacy of the form or communication. The following sentence must be included in any response to the member's electronic media communication. "The form of electronic communication you have chosen to use may not be secure or private. You are accepting the responsibility and risk for the security and privacy of this form of electronic communication. BYC does not accept any responsibility for breaches in security or privacy as a result of this mode of communication."

Prospective Members

The name, marital status, age and contact information of prospective may be retained in hard copy in the physical files of BYC.

This information will be shared on a need to know basis.

All prospective member names will be treated as 'anonymous' members until such time as the prospective member provides their written permission to have their name disclosed as a prospective or actual member.

Personnel will not leave any prospective member information unsecured.

Personal information of prospective members will only be entered into or maintained in electronic form on a secure computer and/or secure media.

Exception to this policy is when a prospective member chooses to use such electronic media to communicate with a BYC representative. In such a case, the BYC representative will inform the prospective member that the form of communication is not secure and the prospective member is accepting the responsibility and risk for the security and privacy of the form or communication. The following sentence must be included in any response to the prospective member's electronic media communication. "The form of electronic communication you have chosen to use may not be secure or private. You are accepting the responsibility and risk for the security and privacy of this form of electronic communication. BYC does not accept any responsibility for breaches in security or privacy as a result of this mode of communication."

Records Management

Retention of personal information

Personal information of members (including anonymous members and prospective members) will be retained for seven (7) years after a membership has expired.

Destruction of personal information

Once personal information has passed the required retention period as stated above, the information will be destroyed securely by the appropriate means available at that time. Currently the appropriate means are shredding of such personal information under the control of a designated BYC representative.

The BYC Secretary or his delegate will ensure such records are destroyed appropriately in a timely manner.

Confidentiality Agreements

All Directors, Advisors, Committee members and volunteers are required to sign the BYC Non-Disclosure Agreement (NDA) prior to receiving information on members or prospective members.

The NDA will contain an explicit reference to the BYC Information Security and Privacy Policy.

Training

All BYC Board members and BYC Board Advisors will be provided with a copy of the BYC Information Security and Privacy Policy (or access to it via the BYC web site.)

All BYC Committee members and all volunteers will be provided with a copy of the BYC Information Security and Privacy Policy (or access to it via the BYC web site.)

Security

Physical Security

All hard copy records of members, anonymous members and prospective members that contain the private personal information will be stored in the offices of BYC. Access to these records will be restricted on a need to know basis, **that is to the Commodore, Hon. Secretary, General Manager and the Office Accountant.**

System Security

Personal information of members, anonymous members and prospective members will be only be entered into or maintained in electronic form on a secure computer and/or secure media. Access to these records will be restricted on a need to know basis, **that is to the Commodore, Hon. Secretary, Director of IT, General Manager and the Office Accountant.**

Exception to this policy is when a member chooses to use such electronic media to communicate with a BYC representative. In such a case, the BYC representative will inform the member that the form of communication is not secure and member is accepting the responsibility for the

security /privacy of the form or communication. BYC will provide a sentence to be included in response emails that states this policy (see section 5.1 and 5.2 above).

Information Security and Privacy Policy Access

The BYC Information Security and Privacy Policy will be available on the publicly accessible web site. The BYC Information Security and Privacy Policy will be available in hard copy accessible on site at the BYC head office on request.

Information Security and Privacy Policy Reviews

An Information Security and Privacy Policy review will be completed by the Secretary of the Board or his/her designate as required to remain compliant with relevant FIPPA legislation.

The Secretary will report to the Board on his/her review findings and provide recommendations on policy changes as may be deemed required.

Changes to policy have to be approved by the Board.