



ONTARIO CAMPS ASSOCIATION

Community. Leadership. Life.

PRIVACY POLICY OF THE ONTARIO CAMPS ASSOCIATION (OCA)

Last Amended: December 2019

The OCA (also referred to as “we”, “our” and “us” in this policy), is a voluntary, non-profit organization whose members are camps (which in this policy include outdoor education centres), individuals and organizations and agencies devoted to maintaining high standards for organized camping and to sharing information and ideas for maintaining those standards. Since 1932, the OCA has played an important leadership role in promoting and encouraging children and youth camping in Ontario through a variety of activities. The OCA provides **education** such as training seminars for camp staff and organizes an Annual Conference that brings together camping professionals from across Canada and other countries. The OCA operates an **accreditation** program through which we review the operations of member camps against over 650 standards that we have developed or adopted. The OCA raises public and governmental **awareness** of the value of camping and assists individuals to find a camp through means such as our website, annual *Camping Guide* and camp fairs. The OCA also **advocates** on behalf of the public to the camping community, responding to concerns raised by parents and campers.

1. This Policy. This policy applies to "personal information", by which we mean information about an identifiable individual, excluding information about an individual in his or her professional capacity, such as that used to communicate about an individual's employment, business or profession.

The OCA used the 10 principles of fair information practices as the basis for this policy. Although most (if not all) of the OCA's collection, use and disclosure of personal information is not subject to privacy law, we have chosen to manage personal information in accordance with and to make our privacy practices known through this policy. Our decision reflects our respect for the individuals who trust us with their personal information and our belief in the importance of letting them know what we do with that information.

The OCA may revise this Policy from time to time, posting the last revised date at the top of the policy. Please take the time to read the policy if we have revised it since the last time you did so. By providing us with your personal information or using our website after a revision, you are consenting to the management of your personal information in accordance with the revised policy.

2. Our Collection, Use & Retention of Personal Information. The OCA limits the personal information we collect to that required to:

- register individual members, maintain their membership records and provide them with membership benefits;
- register individuals for educational programs and provide such programs;
- provide our other services and activities, and/or
- create and distribute our *Camp Guide*.

The OCA may also use personal information it collects or that is publicly available to:

- investigate what we reasonably believe to be a contravention of the law, or the breach of an agreement including to collect a debt;
- address an emergency that threatens the life, health or security of an individual;
- comply with a legal requirement; and/or
- carry out due diligence on a proposed reorganization and/or complete a reorganization of our business.

For the most part, we collect personal information directly from the individual to whom it relates (or their legal representative). We use electronic means, such as cookies, to collect information automatically from users of our website. Cookies are small text files stored on a user's computer that allow an organization to monitor traffic on its website and to store user preferences to avoid users having to re-enter information on subsequent visits. The information the OCA collects through electronic means includes IP address, browser type, pages visited, and visit date and duration. This information may include personal information.

We may retain personal information after an individual's file becomes inactive, unless otherwise required by law. Files become inactive on termination of membership with the OCA or for non-members, on termination of the educational program or activity for which the individual registered.

3. Our Disclosure of Personal Information & Use of Third Party Service Providers. The OCA may disclose personal information to:

- communicate with an individual's next of kin or authorized representative in the event of an injury, illness or death;
- comply with a subpoena, court order or other mandated production or disclosure;
- notify law enforcement or a government agency, regulator or other authority of a possible violation of a law or an individual's rights, and/or assist in the investigation or gathering of information about same;
- investigate a breach of an agreement including collecting a debt;
- detect, suppress or prevent fraud;
- report, investigate and/or prevent financial abuse;
- address an emergency that threatens the life, health or security of an individual; and/or
- comply with the law.

The OCA may disclose personal information of board and committee members to other members to facilitate the work of the board and committees.

The OCA retains third parties to assist in providing membership, registration and other services including those related to our educational programs. Some of our service providers operate from the United States (U.S.). Where required for their services, we provide or permit our third party service providers access to personal information. We require our third party service providers to manage personal information in a manner that is consistent with this policy. Notwithstanding any contractual obligations that the OCA imposes, once transferred or otherwise made available to service providers operating in the U.S., personal information is subject to U.S. law, including a lawful order for production or disclosure to the U.S. Government, its agencies including law enforcement, and courts.

4. Safeguards & Risks

The OCA uses reasonable organizational, physical and technological means to protect personal information against theft, loss and unauthorized access, use, disclosure and destruction. The OCA has designated its Executive Director as its privacy officer, with responsibility for overseeing our compliance with this policy. The OCA limits access to personal information to those of our employees, volunteers, committee members and directors who need the information for their OCA work or activities. The OCA requires committee members, directors and volunteers to return personal information once they no longer require it for the applicable authorized purpose. The OCA shreds personal information before disposing of it to prevent unauthorized access. The OCA restricts access to work areas in which it maintains or uses personal information files to employees. Access to OCA computers is password protected and the OCA uses other tools including firewalls to protect the personal information it holds in electronic format.

Please note that despite our efforts and actions, no safeguards are totally effective in protecting information in electronic databases or while in transit. Accordingly, the OCA cannot guarantee that personal information we collect, use, disclose or retain will be secure from malicious activities, including cyberattacks. Any such activity could result in the use of personal information for fraudulent or other improper purposes and a recommendation that the affected individuals replace identification numbers or documents, give notice to applicable authorities or service providers, or take other action.

5. Access & Correction, Inquires & Complaints. You may request a copy of your personal information in OCA records by writing to our Executive Director as set out below. Upon verification of your identity (to prevent our release of personal information to an unauthorized individual), we will generally respond to your request within 60 days or less. If you demonstrate to our satisfaction that your personal information in our file is inaccurate, we will correct the information. The OCA requests that you notify us of any change to your personal information in our file (change of address or legal representative, for example).

Please also direct any inquiries, concerns or complaints about the OCA's personal information management or management of your personal information to the Executive Director in writing. We will investigate and report our findings on any complaint.

6. Contact information. Joy Levy, Executive Director at joy@ontariocamps.ca.