

Preamble:

To guide the organization on how to handle sensitive private information in accordance with the law.

Policy Statement:

Pride Winnipeg Festival is committed to safeguarding the personal information entrusted to us by our stakeholders. We manage personal information in accordance with Personal Information Protection and Electronic Documents Act (PIPEDA) and other applicable laws. Everyone in the organization is responsible for ensuring that people's private information is collected properly and protected.

Procedure:

1. For the purpose of this policy personal information will constitute as the following:
 - a. A person's full, partial or preferred name,
 - b. A person's phone number,
 - c. A person's email,
 - d. A person's home address (a business address will not be classified as personal),
 - e. A person's demographic information (age, sex, gender identity, income, etc.),
 - f. A person's credit card or banking information,
2. The Vice-President, Corporate Affairs will be designated as the organizations "privacy officer" and is responsible for maintaining and enforcing this policy.
3. The Pride Winnipeg Festival Privacy Statement must be kept up-to-date at all times.
 - a. The statement must be easily accessible on the organizations website and SharePoint.
4. All forms that request personal information must make reference to this policy and the organizations policy statement.
 - a. For online forms a link must be provided to the policy and statement.
5. Anytime personal information is requested a reason must be indicated as to why this information is being requested.
 - a. If the personal information is being collected in-person or through the phone the reasons do not need to be stipulated unless requested.
6. Before a person's personal information is collected there must be consent.
 - a. For online or paper collection methods this can be done by including a consent clause and having the individual sign off on it.
 - b. For in-person or phone collection methods this can be done through a verbal agreement from the individual.
7. The organization has the right to refuse providing a good or service if an individual does not consent to providing us with their person information that is required in order for us to provide said good or service.
8. All personal information will be kept on record for a maximum of three years at which point the information will be destroyed.
 - a. A person may request that their information be destroy earlier than three years. The request must be sent to the organizations privacy officer and must indicate in detail what information they wish to have destroyed.
9. Personal information cannot be shared with individuals outside of the organization unless consent is received. Personal information should only be shared to individuals within the organization that have a need for that information, otherwise it should be protected.
10. An individual may request information about our use of their personal information and any disclosure of that information to persons outside our organization. In addition, they may request a correction of an error or omission in their personal information.
 - a. Information requests must be sent to the organizations privacy officer.

- b. Any refusal to provide what has been requested either partially or in full must be accompanied by a valid reason.
 - i. The individual may appeal this decision to the Board of Directors.
 - c. The organization has a maximum of seven days to comply with an information request, unless an extension has been granted by the individual making the request.
 - d. The organization has the right to charge a fee for an information request at a rate determined by the privacy officer.
 - i. Information requests that are for correcting an error in personal information will not be charged.
11. A privacy audit should be conducted on the organization on an annual basis.

DATE	AMENDED BY	APPROVED BY BLP	APPROVED BY BOD	VERSION NUMBER
2015-03-08	Jonathan Niemczak	2015-03-11	2015-03-18	2.0