



## OUR PRIVACY POLICY

### Introduction

We, The Winnipeg Chamber of Commerce, have created this Privacy Policy in order to demonstrate our commitment to the privacy of our members. It explains our practices regarding the collection, use, retention and disclosure of personal information.

For the purposes of this Privacy Policy, the term “personal information” means information about an identifiable individual, but does not include the name, title, business address or telephone number of an employee of an organization. This term do not include information that does not identify specific individuals, such as aggregate statistics or anonymous data.

This Privacy Policy does not apply to publicly available information, nor does it apply to our corporate clients or corporate members. For instance, the company name, contacts, title, business address, telephone number, fax number, email and website addresses of our corporate members are not considered to be personal information, and are therefore not protected by this Privacy Policy. However, such information may be protected by other Winnipeg Chamber of Commerce policies or through contractual arrangements.

We will conduct periodic reviews of this Privacy Policy to make sure that it remains current with evolving client and member expectations, technologies and laws.

### 1. Accountability

Our Vice President, Finance & Operations, has been designated as our Privacy Officer. She is responsible for our organization’s compliance with applicable privacy legislation, including Canada’s *Personal Information Protection and Electronic Documents Act* (“**PIPEDA**”).

Karen Weiss  
The Winnipeg Chamber of Commerce  
Suite 100-259 Portage Avenue, Winnipeg, MB R3B 2A9  
T: (204) 944-3305  
[kweiss@winnipeg-chamber.com](mailto:kweiss@winnipeg-chamber.com)

### 2. Identifying Purposes

When a company or individual joins The Winnipeg Chamber of Commerce, we require and collect the following information:

- company name;
- main contact for the company and their title;
- mailing address;
- telephone number;
- fax number;
- email address;

- website address; and
- any other contacts within the company that the member chooses to identify.

We require the member to choose their preferred method of communication (*i.e.*, fax, mail or email). We require our business members to provide the number of employees in their organization so that we can identify their dues level. We require our business members to provide us with their industry/business sector for appropriate listing in our Online Business Directory.

On occasion, we also collect credit card information to process membership dues and event payments, if requested by the member.

The information listed above is collected for the following purposes:

- To fulfill our agreements with our clients and members;
- To enable us to communicate on a regular basis with our membership and provide information on our activities in the area of policy and advocacy, event information, new products, new services/programs or special promotions;
- For internal purposes, such as invoicing for events or other services and for annual membership dues and to respond to member requests;
- For publication in our Online Business Directory, which is available to the public at large at [www.winnipeg-chamber.com](http://www.winnipeg-chamber.com). Information published in the Online Business Directory includes: Company Name; Address, City, Province, Postal Code, Telephone, and URL and Business Sector. Contact information for individuals within the business are not published unless the member requests it. We will refrain from publishing any or all of the above information at the request of the member; and
- For any other purpose to which the member consents.

We do not sell, rent or authorize access to any personal information collected about or from our members to third parties, except in accordance with Schedule 1 (attached).

### **3. Consent**

We collect, use, retain and disclose personal information about our clients and members only with their consent, except in the limited circumstances outlined in this Privacy Policy or in applicable legislation. The type of consent required will vary according to the sensitivity of the information.

When a business or individual joins The Winnipeg Chamber of Commerce, they voluntarily provide us with information as outlined in Section 2 on the membership application form.

However, The Winnipeg Chamber of Commerce may collect or use personal information without knowledge or consent if it is clearly in the interests of the individual and consent cannot be obtained in a timely way, such as when the individual is seriously ill or mentally incapacitated.

We may collect, use or disclose personal information without knowledge or consent if seeking the consent of the individual might defeat the purpose of collecting, using or disclosing the information, such as in the investigation of a breach of an agreement or a contravention of a law.

We may also collect, use or disclose personal information without knowledge or consent in the case of an emergency where the life, health or security of an individual is threatened.

We may use or disclose personal information without knowledge or consent to a lawyer representing The Winnipeg Chamber of Commerce, to collect a debt, to comply with a subpoena, warrant or other court order, or as may be otherwise required or authorized by law.

#### **4. Limiting Collection**

Collection of personal information is limited to that which is required to fulfill the purposes outlined in Section 2 above, which we may change from time to time. However, personal information will not be used for such new purposes without the individual's consent.

#### **5. Limiting Use, Disclosure and Retention**

We will only retain personal information for as long as is reasonably necessary. Generally, the Winnipeg Chamber of Commerce retains personal information about members until they cancel their membership, at which time the personal information is deleted from our database as well as from the Online Business Directory. However, this retention period may extend beyond the end of a member's relationship with us when it is required by law, or when it is reasonably necessary for us to have personal information to respond to any issues arising out of our relationship that may need to be addressed at a later date.

We may provide personal information to other persons only:

- when we have an individual's consent, whether express or implied;
- to the suppliers or agents who assist us, and whom we can reasonably trust to respect privacy; or
- when we are required or permitted by law to do so, or when we need to disclose the information to protect our interests in the context of a legal or administrative proceeding.

#### **6. Accuracy**

We make reasonable efforts to keep personal information accurate, complete and up-to-date. If you find any errors in the personal information we have about you, let us know and we will make the appropriate corrections and make sure they are conveyed to anyone we may have misinformed. For personal information that remains in dispute, we will make a note of your opinion in our records.

At any time, members can inform our office, in writing, of changes to their membership information. It is the responsibility of the Operations Assistant to ensure that these changes are made in our database, which subsequently is used to update our Online Business Directory.

#### **7. Safeguards**

We protect personal information with appropriate safeguards and security measures to protect against unauthorized access and use. As well, all our suppliers and agents, as part of their contracts with The Winnipeg Chamber of Commerce, are bound to maintain confidentiality and may not use personal information for any unauthorized purpose. Also, when we provide personal information in response to a legal enquiry or order, we ensure that the order is valid and we disclose only the information that is legally required.

All staff have access to general information about our membership through our CRM. This general information includes that which is provided on the membership application, the member's participation on committees and event attendance.

Access to a member's financial information, which includes their payment history, is restricted to the following persons: Vice President, Finance & Operations, Director of Finance, Operations Assistant and Membership Services Coordinator.

Access to credit card information provided by the member is restricted to event staff and accounting staff. Online protection of this information is outlined in Schedule 2 (attached). Paper copies of this information are kept in a locked filing cabinet.

All employees are aware of our security and privacy practices.

Computer servers that store personal information are kept in a secure environment.

## **8. Openness**

Our Privacy Policy is available on our website. A printed copy can be obtained by contacting The Winnipeg Chamber of Commerce office – (204) 944-8484 or [info@winnipeg-chamber.com](mailto:info@winnipeg-chamber.com).

Questions regarding our Privacy Policy can be directed to our Privacy Officer:

Karen Weiss  
Vice President, Finance & Operations  
The Winnipeg Chamber of Commerce  
Suite 100-259 Portage Avenue  
Winnipeg, MB R3B 2A9  
T: (204) 944-8484  
F: (204) 944-8492  
[kweiss@winnipeg-chamber.com](mailto:kweiss@winnipeg-chamber.com)

## **9. Individual Access**

All membership information is stored in our Customer Relationship Management software.

Membership contact information is available in our online Business Directory.

Please contact our offices if you wish to have access to any personal information we may have about you. We will advise you in advance if a minimal charge is required for us to conduct a search of our records for personal information about you, and will respond to your request within 30 days.

Please note that we may not be able to provide personal information about you from our records if it contains references to other persons, is subject to legal privilege, contains information proprietary to The Winnipeg Chamber of Commerce or cannot be disclosed for other legal reasons.

## **10. For More Information**

If you have any concerns or questions about privacy and confidentiality - or any concerns about the way a request for personal information was handled – please direct your complaints or inquiries to our Privacy Officer:

Karen Weiss  
Vice President, Finance & Operations  
The Winnipeg Chamber of Commerce  
Suite 100-259 Portage Avenue  
Winnipeg, MB R3B 2A9  
T: (204) 944-8484  
F: (204) 944-8492  
[kweiss@winnipeg-chamber.com](mailto:kweiss@winnipeg-chamber.com)

The Winnipeg Chamber of Commerce Privacy Officer has the decision-making authority to resolve most privacy-related concerns. However, if you are not satisfied with the way in which a complaint was resolved or if you have further questions about the protection of personal information in Canada, we recommend that you contact the federal Privacy Commissioner:

Office of the Privacy Commissioner  
112 Kent Street  
Ottawa, Ontario  
K1A 1H3  
Web Address: [www.privcom.gc.ca](http://www.privcom.gc.ca)

THE WINNIPEG CHAMBER OF COMMERCE  
PRIVACY POLICY

**SCHEDULE 1**

**Policy on the Sale and Reproduction of The Winnipeg Chamber of Commerce's Membership Database**

The Winnipeg Chamber of Commerce membership database is not available for sale to either members or non-members and it is not made available for outsourcing.

Our Online Business Directory is available to facilitate business-to-business networking

We acknowledge that members are able to build their own databases from the information found online. However, as an organization, *we do not condone or support* this practice for the mass distribution of promotional material or other solicitation to our membership.

We are pleased to offer other economical methods to members to advertise their products and services to other members:

- Advertising in our digital newsletter
- Advertising on our website
- Sponsorship opportunities

THE WINNIPEG CHAMBER OF COMMERCE  
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**SCHEDULE 2**

Your privacy is important to us. This Schedule outlines our commitment to ensuring your privacy and what you can expect from us when you visit The Winnipeg Chamber of Commerce's website at [www.winnipeg-chamber.com](http://www.winnipeg-chamber.com).

We collect personally identifiable information from you only with your knowledge and consent, except in the situations noted below and/or explained in our Privacy Policy. Most of the information we collect from our website visitors is non-personally identifiable (*i.e.*, it is anonymous and is not linked to a particular individual).

We collect information from visitors to our website who are registering for events, from users who agree to participate in online surveys and from users who wish to make online information requests to us. The type of information collected includes user contact information (such as name, company name and email address). The visitor's information may only be used to contact the visitor when he or she expressly consents to being contacted.

We track and record IP addresses that access our site for reporting and profiling purposes only. We also gather anonymous browsing habits of our visitors to better identify content preferences.

Our website does not use cookies; they are not created or collected on any page throughout the website.

We do not sell, rent or disclose any data collected about or from our users to third parties, except in accordance with our Privacy Policy.

**On-Line Event Registration**

We request the following information from a visitor on our on-line Event registration form:

- First and Last Name and Title
- Company
- Address
- Telephone and Email
- Credit Card Number and Expiry Date

This information is used for billing purposes and to confirm registration. If we are unable to process a registration, the contact information is used to contact the user.

Sensitive information, such as credit card number and expiry date, is encrypted and is protected with SSL.

We also take reasonable precautions to protect user information offline, as outlined in Section 7 of our Privacy Policy.

**Accuracy and Access**

Please note that, upon written request, we offer website visitors the ability to have inaccuracies corrected in personal information we have collected about them. Visitors can have this personal information corrected by writing to us at the above address. Accuracy and/or access requests of this nature are governed by the procedures set out in our Privacy Policy.

## **Additional Security Measures**

Our website has the following additional security measures in place to protect the loss, misuse and alteration of the personal information under our control:

1. Our web server is located off-site in a secure location
2. A firewall is in place to filter all inappropriate access to our web server
3. All web server access is logged
4. Our web server has a comprehensive backup plan which includes daily backups and off-site storage

## **Links to Other Sites**

Our website contains resource links to other websites. The Winnipeg Chamber of Commerce is not responsible for the privacy practices of such sites. We encourage our users to be aware when they leave our site and to read the privacy statements of other sites they visit.

## **Legal Disclaimer**

We reserve the right, at our sole discretion, to change, modify, add or remove portions of this Schedule at any time. If our information practices change at some time in the future, we will post the changes to our website in order to notify you of these changes. However, we will only use personal information collected after the changes are published for new purposes. Please check back frequently.

If you have a question or complaint regarding our privacy policies or procedures, or if you wish to access any personal information we may have on file about you, you may contact our Privacy Officer:

Karen Weiss  
The Winnipeg Chamber of Commerce  
Suite 100-259 Portage Avenue, Winnipeg, MB R3B 2A9  
T: (204) 944-8484  
F: (204) 944-8492  
[kweiss@winnipeg-chamber.com](mailto:kweiss@winnipeg-chamber.com)

If your concerns are not resolved to your satisfaction, you may consider contacting the Privacy Commissioner of Canada at the following address:

Office of the Privacy Commissioner  
112 Kent Street  
Ottawa, Ontario  
[www.privcom.gc.ca](http://www.privcom.gc.ca)