

	Policy FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY	
	Prepared by Karen Cullen	Date Prepared October 5, 2020
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FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY POLICY

Purpose

Westben is committed to protecting the privacy and confidentiality of its' patrons' personal information and to the principles and requirements as set out in the Freedom of Information and Protection of Privacy Act (FIPPA).

Scope

This policy applies to all staff (full-time, part-time, casual and contract) appointees, members of the Board of Director and volunteers of Westben.

Policy Statement

Westben is committed to compliance with the Freedom Of Information and Privacy Act (FIPPA) which ensures 1) protection of the privacy of individuals' personal information and provides these individuals with the right of access to their information and 2) provides the right of access to general information under the control of Westben.

Personal Information Defined

According to FIPPA, personal information means recorded information about an 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 to the individual or where the disclosure of the name would reveal other personal information about the individual.

Personal Information Collected by Westben

Personal information collected by Westben includes name, address, telephone numbers, email address, payment method, previous ticket purchases and donations, volunteer activity, patron communications and preferences/special needs identified.

Collection of Personal Information

In accordance with the legislation, an organization shall not use personal information in its custody or under its control except:

- Where the person to whom the information relates has identified that information in particular and consented to its use
- For the purpose for which it was obtained or compiled or for a consistent purpose

Purpose of Collection of Personal Information by Westben

Personal information is collected by Westben when a brochure is requested, tickets or memberships are purchased or a request is received to be included on Westben's mailing list. Information will only be sent to the individual requesting it and not to another party without that party's consent. This is consistent with Westben's mission and purpose and is consistent with an individual's reasonable expectation for collection of this information.

Privacy and Protection of Personal Information

- Collection of personal information is used solely to keep patrons up-to-date on Westben events or any changes to performances already purchased;
- Collection of personal information is also used to satisfy legal and regulatory requirements of Westben as a charitable organization and as general statistics for funding agencies;
- Collection of personal information is consistent with Westben's Code of Conduct policy;
- Westben does not sell, trade or make available any mailing lists to other organizations;
- If/when a third party mailing house is used, it is done so under an agreement that the information provided is for one-time use only;
- If personal information is to be used for fundraising, notice will be given to the individual to whom the personal information relates and request the individual's consent. Notice will also be given that the individual has a right at anytime to request that his/her personal information cease to be used for fundraising purposes;
- Personal information is stored in a secure office environment accessible only by authorized staff. Information is retained for a reasonable period after which it is destroyed in a secure manner.

Breach of Policy

Any breach of this policy will be reported to the Advancement and Marketing Director who will respond in an expedient manner, according to the timelines set out in the legislation (FIPPA). The Director will also put in place steps to contain the breach, notify impacted individuals, and decide whether the breach should be reported to the Privacy Commissioner. Preventative measures will also be developed to ensure no further policy breaches occur.

Access to Information

Questions or concerns about this Policy or information on how to access/update personal information can be provided by contacting Westben directly at Westben.ca or by calling 1-705-653-5508 or toll free at 1-877-883-5777.

Further information on privacy legislation can also be found on the website for the Office of the Information and Privacy Commissioner of Ontario: info@ipc.on.ca