

## **1.01 Golf Ontario Privacy Policy**

**Golf Ontario** is committed to maintaining your confidence and trust, and accordingly maintains the following privacy policy to protect personal information you provide. As part of our commitment to your privacy, we have adopted the ten principles based on the values set by the Canadian Standards Association's *Model Code for the Protection of Personal Information* and Canada's PIPEDA.

### **1. Accountability**

The personal information you provide is stored in a secure location, is accessible only by designated staff, and is used only for the purposes for which you provide the information.

### **2. Identifying Purposes**

The purposes for which personal information is collected shall be identified before or at the time the personal information is collected.

### **3. Consent**

Individual's consent will be obtained for the collection, use or disclosure of personal information, and in order to communicate with an individual by commercial electronic messages, except where the law provides an exemption. Consent is never required as a condition of supplying a product or service, to the collection, use or disclosure of information beyond what is necessary to fulfill explicitly specified and legitimate purposes.

### **4. Limiting Collection**

The personal information we collect shall be limited only to that which is necessary for the purposes identified and will not be collected indiscriminately.

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

Personal information shall only be used or disclosed for the purposes for which it was collected, (e.g. direct mail of Ontario Golf Magazine) unless an individual has otherwise consented or when it is required or permitted by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

### **6. Accuracy**

We shall keep personal information as accurate, complete and up-to-date as may be necessary to fulfill the purposes for which it is to be used.

### **7. Safeguards**

We shall protect personal information using security safeguards that are appropriate to the sensitivity level of the personal information received. Privacy breaches will be managed according to the protocol set out in Appendix A.

### **8. Openness**

Golf Ontario will provide information to individuals about our policies and procedures relating to the management of personal information that is under our control.

### **9. Individual's Access**

On written request to our Privacy Officer, an individual will be informed of the existence, use and disclosure of their personal information that is under our control, and may be given access to that personal information as required and permitted by law. Individuals are entitled to challenge the accuracy and completeness of that personal information and request that it be amended, if appropriate. Access Requests may be submitted using the form provided in Appendix C.

### **10. Handling Inquiries or Complaints**

Any questions or inquiries concerning compliance with our privacy policies and procedures may be addressed to our Privacy Officer, as set out below. Inquiries and Complaints may be submitted using the form provided in Appendix C.

**Why we collect and use personal information**

Collecting personal information about you is essential to our being able to provide the services that best meet your needs.

Personal information may be used to:

- To measure the success of strategic or operational priorities
- To determine eligibility for events, products or services
- To process applications for members and provide requested information, products or services
- To understand and assess member's ongoing needs and offer products or services to meet those needs
- For billing and accounting services related to our organization
- For member communication, service and administration, including sending commercial electronic messages such as text messages and e-mails
- For internal, external and regulatory audit purposes
- To comply with legal and regulatory requirements

**Personal information may also be used for other purposes, subject to obtaining your prior consent for such use.**

**Third Party Service Providers**

Golf Ontario may engage with third parties from time to time who process/store confidential personal information. Third parties performing services on our behalf must provide the same level of security safeguards as Golf Ontario itself provides. A list of current service providers is included in Appendix B.

**No Release of Information to Third Parties**

Personal information will not be released to third parties other than for the mailing of partnership golf publications and materials. There are no circumstances under which we will provide or sell personal information, including your email address, to third parties.

**Consent to use personal information** may be obtained in various ways. We may obtain your express consent or we may determine that consent has been implied by the circumstances. Express consent could be in writing (for example in a signed consent, e-mail or application form), or verbally in person or over the telephone. When we receive personal information from you that enables us to provide you with requested services, your consent to allow us to deal with that personal information in a reasonable manner would be implied. Under Canada's Anti-Spam Law, we may have implied consent to send you commercial electronic messages if there is an existing business relationship or an existing non-business relationship between Golf Ontario and yourself. If you need to provide personal information about other individuals (such as employees, dependants, etc.), you must obtain their consent for these purposes prior to your disclosure to us.

Providing us with your personal information is always your choice. When you request services from us, we ask that you provide information that enables us to respond to your request. In doing so, you consent to our collection, use and disclosure of such personal information for these purposes. You also authorize us to use and retain this personal information for as long as it may be required for the purposes described above. Your consent remains valid even after the termination of our relationship with you, unless you provide us with written notice that such consent is withdrawn. By withdrawing your consent, or not providing it in the first place, you may limit or even prevent us from being able to provide you or an authorized third party (such as an employer) with the service desired.

In certain circumstances, consent cannot be withdrawn. There are legal exceptions where we will not need to obtain consent or explain the purposes for collection, use or disclosure of personal information. For example, this exception would apply if there is an emergency that threatens the life, health or security of an individual, or if we must comply with a court order.

**Keeping information accurate** and complete is essential. Having accurate information about you enables us to give you the best possible service. You have the right to access, verify and amend the information we have about you. We rely on you to keep us informed of any changes, such as a change of address, telephone number or any other circumstances – simply contact our office. Despite our best efforts, errors sometimes do occur. If you identify any personal information that is out of date, incorrect or incomplete, please let us know and we will make the corrections promptly and use every reasonable effort to communicate these changes to other parties who may have inadvertently received incorrect or out of date

information from us.

**Anti-Spam Policy**

Golf Ontario may use your personal information to send you commercial electronic messages, such as by e-mail, text message or social media message. We will only send you electronic messages if you have provided us express consent or if consent can be implied under Canada's Anti-Spam Law. All commercial electronic messages sent by us will comply with CASL, including the identification of the entity which sent the message and (if different) the entity on whose behalf the message is being sent, and we will include an unsubscribe mechanism that can be "readily performed." At any time, you may opt out from receiving commercial electronic messages by using the unsubscribe mechanism in each message or by contacting Golf Ontario's Privacy Officer.

**Privacy and the Internet**

Our server is not set up to track, collect or distribute personal information about its users. It does recognize the referring server of visitors, but not e-mail address or any personal information. For example, we can tell which Internet service Provider our visitors use, or what site they clicked in from, but not the names, addresses or other information about our visitors that would allow us to identify the particular visitors to our site. The Golf Ontario website may contain links to other third party sites that are not governed by this privacy policy. Although we endeavor to link only to sites with high privacy standards, our Privacy Policy will no longer apply once you leave this website ("gao.ca"). We are not responsible for privacy policies employed by other third parties or any foreign affiliates, since they would be governed by privacy legislation applicable in their country of residence. We suggest, therefore, that you examine the privacy statements of those sites to learn how personal information may be collected, used and/or disclosed.

**Contact Information**

Please contact our Privacy Officer to obtain further information about our policies and procedures or if you have any unresolved inquiries or concerns. Our Privacy Officer can be contacted as follows:

Mail: Golf Ontario  
P.O. Box 970  
Uxbridge, ON L9P 1N3  
Attn: Privacy Officer

Email: [admin@gao.ca](mailto:admin@gao.ca)

Fax: (905) 852-8893  
Attn: Privacy Officer

***While Golf Ontario makes every effort to secure all communications within our control and on our premises, please be advised that no method of delivery is absolutely secure and any communication of personal information may be accidentally or deliberately intercepted by third parties.***

**APPENDIX A****PROTOCOL FOR PRIVACY BREACHES**

1. The Privacy Officer must report any breach of security safeguards involving personal information under Golf Ontario's control if it is reasonable in the circumstances to believe that the breach of security safeguards creates a *real risk of significant harm* to an individual to the Ontario Privacy Commissioner (OPC) and the affected individuals.
2. Significant harm, as defined by the law, includes: bodily harm, humiliation, damage to reputation or relationships, loss of employment, business or professional opportunities, financial loss, identity theft, negative effects on the credit record and damage to or loss of property.
3. The Privacy Officer must complete a PIPEDA breach report form for these instances: :  
<https://www.priv.gc.ca/en/report-a-concern/report-a-privacy-breach-at-your-organization/report-a-privacy-breach-at-your-business/>
4. A record of all such breaches must be kept for 2 years, including the following at minimum:
  - Assessment of classification as a "real risk of significant harm";
  - Date or estimated date of the breach;
  - General description of the circumstances of the breach;
  - Nature of information involved in the breach; and
  - Whether or not the breach was reported to the Privacy Commissioner of Canada/individuals notified.

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**APPENDIX B****THIRD PARTY SERVICE PROVIDERS**

Golf Ontario engages the services of the following third parties who process/store confidential information:

- Golf Genius (Tournament Registration)
- Cognito LLC (Cognito Forms)
- F1Tech Inc. (Computer Support and Service)
- Golf Canada (Scorecentre)
- SmartSheet Inc. (Collaboration and work management)
- DocuSign (Digital document approval online tool)
- Sterling Backcheck Canada Corp. (employee & volunteer background screening)
- Better Impact Inc. (Volunteer management)
- ADP (Payroll)
- LA CRM (Member Facility & Clubs' contact database)
- Board Effect (Board Management Software)

**APPENDIX C**

**GOLF ONTARIO  
Personal Information Protection and Electronic Documents Act  
Access/Inquiry/Complaint Form**

<b>ATT:</b> <b>Privacy Officer</b> Address City, Province Postal Code Phone Number	<b>Note: you must produce at least 2 pieces of ID bearing a signature, one of which should include photo identification and a birthdate in order to obtain personal information.</b>
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<b>Request for:</b> <input type="checkbox"/> Access to Personal Information <input type="checkbox"/> Inquiry <input type="checkbox"/> Complaint	<b>Member No.:</b>
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<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> Ms. <input type="checkbox"/> Miss	Last Name:
First Name:	Middle Name:
Address: (Street/Apt No./P.O. Box/R.R. No.)	City/Town:
Province:	Last Name:
Telephone Number (Day) (     )       -	Telephone Number (Evening) (     )       -
ID Checked:	Email Address:

<b>Nature of Inquiry, Complaint or Access Requested: (Please provide a detailed description)</b>	
Member Signature:	Date:

<b>FOR PRIVACY OFFICER USE ONLY:</b>	<b>Date Received:</b>
Comments:	

*Personal information contained on this form is collected solely for the purpose of responding to your request .*

**APPENDIX D – FOR EMPLOYEE USE ONLY****ACCESS AND COMPLIANCE PROCEDURES**

Under PIPEDA, members have the right to access their personal information, inquire about privacy policies and challenge compliance. In many circumstances, members are entitled to access their personal information without a formal access request under the Personal Information Protection and Electronic Documents Act. For example, members can normally access their personal information through Golf Genius or Score Centre.

For specific inquiries regarding other personal information, inquiries or complaints, a “PIPEDA Access/Inquiry/Complaint Form” must be filled out and sent to the Privacy Officer. Examples of such situations could be that a member wants to know what information is held by the organization.

Access to information requests, inquiries about information held/disclosed or privacy practices and complaints concerning privacy should be mailed to the Privacy Officer.

Access, Inquiry & Complaint Process:

Once you have determined that the member is not making a general request for information, a written complaint or access request is in order:

1. Assist the member to complete an Access to Information Request Form. Include all pertinent details of the request/complaint. Make sure the member has signed the form and stamp the form with your date stamp.
2. Verify proof of identity or be certain of the member's identity for a request for access. To verify identification the member should provide two pieces of ID bearing a signature, one of which should include photo identification and a birth-date.
3. Send the form to the Privacy Officer, noting “Attention: Privacy Officer” on the envelope. This is to ensure the documents can be forwarded to the Deputy Officer if needed.
4. Privacy Officer will review all information concerning the request/complaint and may contact the member concerning any additional information needed.
5. The Privacy Officer will respond to the member in writing within 30 days except in exceptional circumstances. If the timeframe needs to be extended, member will be sent notice of the extension.
6. Access/Inquiry Request:
  - A copy or summary of the information requested may be mailed via registered mail and marked “Personal and Confidential” or arrangements for access in person can be made. The information must be presented in a format that is understandable to the member and must not include any abbreviations/company jargon/etc.
  - A fee may be imposed where the information requested requires exceptional time and effort. The member will be notified in advance of the cost (if any) for the access.
  - If access is denied for exceptions specified in the Act, the member will be informed in writing as well; the Board of Directors will be informed. The member may then complain to the Board and the complaint process will take over.

Complaints

1. All complaints will be investigated and documented.
2. If a member demonstrates the inaccuracy or incompleteness of personal information, the information will be amended as required. Where appropriate, the amended information will be transmitted to Third Parties having access.
3. If the Privacy Officer cannot agree to the requested amendment, a statement of disagreement will be attached to the records.
4. Appropriate measures will be taken to rectify a situation if the complaint is justified. Policy and procedures or information management practices will be altered if necessary and Board will be notified.
5. If Privacy Officer determines that the complaint is not justified, it will be communicated to the member in writing and inform the member of their right to re-direct their complaint to the Board of Directors.
6. If the complaint is taken to the Board, the Board shall first verify that the Privacy Officer previously dealt with the complaint and shall review the file prepared by the Privacy Officer.
7. If still not resolved at Board level, the member shall be informed and the complaint shall be referred to Privacy Commissioner of Ontario for resolution.

**APPENDIX E – FOR EMPLOYEE USE ONLY****SAFEGUARDS FOR THE PROTECTION OF PERSONAL INFORMATION**

Employees are required to adhere to the Privacy Policy including the following measures:

**1. Clean Desk Policy**

All sensitive or confidential information must be removed from workspaces and locked away at the end of each day.

**2. User Access Reviews**

Administrators of all Golf Ontario internal and third party systems are responsible for ensuring that access is revoked promptly for all terminated employees including summer students and contractors. User access permissions must be reviewed at least annually to ensure that access is appropriate.

**3. Credit Card Handling Procedures**

Credit card transactions must be processed immediately upon receipt of credit card information. Such credit card information must be deleted or shredded as soon as transactions are processed. If credit card information is to be kept on file for the purpose of agreed upon installment or future payments, the credit card information must be kept in a locked cabinet and subsequently destroyed once all authorized payments are processed.

**4. Shared Drive Review**

Access to Shared Drives on Golf Ontario's file server must be reviewed at least annually to ensure that user access is appropriately restricted for each drive to the specific employees responsible for the information stored therein. Access must be revoked promptly for all terminated employees including summer students and contractors.

**5. Employee Procedures**

All confidential personal information downloaded to an electronic device should be password protected to avoid theft of information in the event that a computer/electronic device is stolen or accessed by an unauthorized individual. Information collected by way of third party sites such as Cognito Forms or SmartSheet should be encrypted and deleted from the third party site once exported or no longer needed. Sharing of confidential personal information between staff members via email should be avoided or marked as Confidential and deleted as soon as received.