# CALGARY STAMPEDE FOUNDATION PRIVACY POLICY

Calgary Stampede Foundation (the "Foundation"), is committed to maintaining the accuracy, confidentiality and security of your personal information. This Privacy Policy describes some of the personal information that the Foundation collects, how we use, and to whom we disclose that information.

This Privacy Policy applies to the personal information of all individuals, including donors and volunteers.

# What is Personal Information?

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual, other than the person's business contact information when used or disclosed for the purposes of enabling the individual to be contacted in relation to their business responsibilities.

# What Personal Information do we Collect?

We collect and maintain different types of personal information in respect of individual donors, volunteers and others with whom we interact. This includes:

- contact and identification information, such as your name, address, telephone number, e-mail address, date of birth and gender, employment, social insurance number and volunteer or donor history; and
- financial information, such as your donor history and payment methods (such as cheque, credit card or debit card information) and banking information.

We may also collect information related to our media and public relations activities and information related to our interactions with our employees, volunteers, program participants and members of the community.

As a general rule, the Foundation collects personal information directly from you when you enter into a contract with the Foundation, make a donation thereto or participate in or support one of the Foundation's programs or activities. In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources (note that such permission may be given directly by you, or it may be implied from your actions as further discussed below).

From time to time, we may work with, or utilize the services of, third parties and may also receive personal information collected by those third parties in the course of our relationship with such third parties, or the performance of their services for, us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

Where permitted or required by applicable law or regulatory requirements, we may collect information about you without your knowledge or consent.

# Why Do We Collect Personal Information?

We collect personal information to enable us to manage, maintain, and develop our activities and operations, including:

- to establish, maintain and manage our relationship with you so that we may provide you with opportunities to participate in and to support our programs and activities;
- to be able to review your donor history with the Foundation;
- to be able to review how you access and participate in the Foundation's programs and activities as well as those of the Calgary Exhibition and Stampede Limited ("CES");
- to enable us to comply with applicable law or regulatory process, including the Canada Revenue Agency requirements of a registered charity;
- to be able to comply with your requests (for example, if you prefer to be contacted at a business or residential telephone number and advise us of your preference, we will use this information to contact you at that number); and
- any other reasonable purpose to which you consent.

In addition, your personal information may be collected, used or disclosed in the course of your participation in some or all of the programs that the Foundation may offer from time to time.

Please be assured, we are not in the business of nor are we in the practice of selling, renting or giving away your personal information to third parties for the purpose of allowing others to solicit donations from you or to otherwise market their services to you.

# How Do We Use and Disclose Your Personal Information?

We may collect, use and disclose your personal information:

- 1) for the purposes described in this Privacy Policy;
- 2) as permitted or required by applicable law or regulatory requirements; and
- 3) for any additional purposes that we advise you of and, where your consent is required by law, we have obtained your consent.

We may, in all circumstances, use and disclose your personal information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

# When Do We Disclose Your Personal Information?

We may share your personal information with our employees, affiliates, shareholders, volunteers, contractors, consultants and other parties who require such information to assist us with managing our relationship with you and carrying out our activities, including: third parties that provide

services to us or on our behalf and third parties that assist the Foundation in the provision of services to you and third parties whose services we use to conduct our business.

For example, we may share your personal information, from time to time, with our third party information technology, data processing, accounting, human resources, and marketing services providers or partners, including the CES so that we may carry out our activities.

Further, your personal information may be disclosed:

- as permitted or required by applicable law or regulatory requirements;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- during emergency situations or where necessary to protect the safety of a person or group of persons;
- where the personal information is publicly available;
- To the CES, who may use such information in creating event guest lists; or
- with your consent.

# Your Consent is Important to Us

It is important to us that we collect, use or disclose your personal information where we have your consent to do so. Depending on the sensitivity of the personal information, your consent may be implied, deemed (using an opt-out mechanism) or express. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. For example, when you enter into an agreement with us or otherwise provide information to us, we will assume your consent to the collection, use and disclosure of your personal information for purposes related to the performance of that agreement and for any other purposes identified to you at the relevant time or in this Policy unless you indicate otherwise in the manner discussed below.

Typically, we will seek your consent at the time that we collect your personal information. Note however, that as discussed below, consent may be implied or deemed where it is appropriate to do so in accordance with this Policy. In certain circumstances, your consent may be obtained after collection but prior to our use or disclosure of your personal information. If we plan to use or disclose your personal information for a purpose not previously identified (either in this Privacy Policy or separately), we will endeavor to advise you of that purpose before such use or disclosure.

As we have described above, we may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required to do so by applicable law or regulatory requirements.

We assume that, unless you advise us otherwise, you have consented to the collection, use and disclosure of your personal information as explained in this Privacy Policy.

# **Choice/Opt-Out**

You may change or withdraw your consent at any time, subject to legal or contractual obligations and reasonable notice, by contacting our Operations Manager/Privacy Officer using the contact information set out below. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Operations Manager/Privacy Officer.

# How is Your Personal Information Protected?

The Foundation endeavors to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, copying, use, modification or disclosure.

# **Updating Your Personal Information**

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of our relationship, please keep us informed of such changes.

In some circumstances we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

#### Access to Your Personal Information

You can ask to see your personal information. If you want to review, verify or correct your personal information, please contact our Operations Manager/Privacy Officer. Please note that any such communication must be in writing.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with your personal information. We may charge you a fee to access your personal information; however, we will advise you of any fee in advance. If you require assistance in preparing your request, please contact our Operations Manager/Privacy Officer.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

# **Inquiries or Concerns?**

If you have any questions about this Privacy Policy or concerns about how we manage your personal information, please contact our Operations Manager/Privacy Officer by telephone, in

writing or by e-mail. We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you. If you are dissatisfied with our response, you may be entitled to make a written submission to the Privacy Commissioner.

# **Operations Manager/Privacy Officer**

We have appointed an Operations Manager/Privacy Officer to oversee compliance with this Privacy Policy. The contact information for our Operations Manager/Privacy Officer is as follows:

Operations Manager/Privacy Officer Jason Demers 1410 Olympic Way S.E. Calgary, Alberta T2G 2W1	
Phone: (403) 261-9130 Fax: (403) 265-7197	E-mail: jdemers@calgarystampede.com

# **Revisions to this Privacy Policy**

From time to time, we may make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal information. We will post any revised version of the Privacy Policy on our website, and we encourage you to refer back to it on a regular basis.

# **Interpretation of this Privacy Policy**

Any interpretation associated with this Privacy Policy will be made by our Operations Manager/Privacy Officer. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word "including" is used, it shall mean "including without limitation".

This Privacy Policy does not create or confer upon any individual any rights, or impose upon the Foundation or obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and Alberta's provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and Canada's federal and Alberta's provincial privacy laws, as applicable, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.

# This Privacy Policy was last updated on April 25, 2019.