

CORPORATE POLICY			
Department	Corporate Governance	Number	CP-007
Subject	Privacy	First Issued	September 12, 2012
		Effective	December 8, 2020
Issued to	All Members of the Calgary Stampede	Version	05
Approved by	Board of Directors	Next Review	September 2024

1.0 POLICY STATEMENT

The Calgary Stampede is committed to maintaining the accuracy, confidentiality and security of the personal information that is in the organization's custody or under the organization's control. This Privacy policy describes how the Calgary Stampede may collect, use and disclose personal information and provides additional information regarding the privacy practices of the Calgary Stampede.

2.0 POLICY RATIONALE

The Calgary Stampede has adopted a Privacy policy and privacy practices in order to be compliant with applicable privacy legislation (including Alberta's *Personal Information Protection Act*) and to demonstrate the organization's longstanding commitment to responsible business practices. Privacy legislation in Canada varies between jurisdictions, and between Canada and other countries. Consequently, all of the rights and obligations contained in this Privacy policy may not be available to all individuals or in all jurisdictions.

3.0 SCOPE

This Privacy policy applies to all members of the Calgary Stampede. It governs the collection, use and disclosure of the personal information of Calgary Stampede members with whom the organization interacts in the course of business.

4.0 POLICY DEFINITIONS

Executive Management Team: refers to the chief executive officer, chief operating officer and the vice presidents.

Guest: refers to individuals who are not members of the Calgary Stampede attending functions and/or using facilities on Stampede Park.

Members: refers to all employees and volunteers of the Calgary Stampede and any third party organizations or individuals providing services under contract on the behalf of the Stampede with respect to those services.

Personal Employee Information: means personal information reasonably required for the purposes of establishing, managing or terminating an employment relationship or managing a post-employment relationship between the Calgary Stampede and that individual and can include, without limitation, an individual's name, home address, telephone number, personal email address, date of birth, employee identification number, social insurance number and skills information (such as professional designations, occupation, qualifications, languages spoken, training, experience and education).

Personal Information: any information about an identifiable individual, other than the person's business title and/or business contact information, when used or disclosed for the purpose of business communications.

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Personal Volunteer Information: means personal information reasonably required for, managing or terminating a volunteer-work relationship or managing a post-volunteer-work relationship between the Calgary Stampede and that individual and can include, without limitation, an individual's name, home address, telephone number, personal email address, date of birth, volunteer identification number and skills information (such as professional designations, occupation, qualifications, languages spoken, training, experience and education).

Stampede Supporters and Prospective Supporters: refers to donors and sponsors as well as prospective donors and sponsors.

5.0 POLICY DETAILS

COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

5.1 How the Calgary Stampede Collects Personal Information

5.1.1 The Calgary Stampede collects different types of personal information, personal employee information and personal volunteer information in respect of the board members, employees, volunteers and other individuals with whom the organization interacts.

5.1.2 The Calgary Stampede will obtain consent for the collection of personal information where necessary and may collect personal information without knowledge or consent where permitted to or required by applicable laws or regulatory requirements.

5.1.3 The personal information and/or Personal Employee Information and/or Personal Volunteer Information that is collected, depending on the nature of an individual's relationship with the Calgary Stampede, may include, but is not limited to:

- i) Contact and identification information, such as an individual's name, address, telephone number and e-mail address;
- ii) Identification information;
- iii) Resumes and/or applications;
- iv) References and interview notes;
- v) Photographs and videos;
- vi) Volunteer information sheets;
- vii) Offer letters and employment contracts;
- viii) Payroll information forms, including, social insurance number and pay cheque deposit information;
- ix) Wage and benefit information;
- x) Uniform and safety equipment information forms;
- xi) Parking authorization information forms;
- xii) Expense reimbursement forms;
- xiii) Medical services forms, including information related to the medical services that are sought or obtained from the Calgary Stampede's medical services provider;

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- xiv) Forms relating to the application for, or changes to, employee health and welfare benefits, including short and long term disability, life insurance, optional life insurance, accidental death and dismemberment, medical and dental care;
- xv) Beneficiary and emergency contact information;
- xvi) Product and service related information concerning the products and services that the organization provides to, or receives from an individual;
- xvii) Financial information, such as payment methods (credit card or debit card information), credit history (where an individual wishes to obtain credit from the Stampede) and/or direct deposit or banking information (so that the organization can pay for the products and services obtained from an individual);
- xviii) Relationship information, including information related to agreements, preferences, advisors and decision-makers, feed-back and information requested by or provided to an individual; and,
- xix) Background information, including information obtained through criminal record and vulnerable sector checks.

5.1.4 The Calgary Stampede values the opinions and suggestions of the individuals with whom the organization interacts. The Calgary Stampede may collect market-related information, which may include personal information, concerning market trends and activities impacting Stampede businesses and operations.

5.1.5 The Calgary Stampede may also collect information, which may include personal information, related to media and public relations activities and information related to interactions with board members, employees, volunteers, program participants, Stampede Park guests, Stampede Park neighbours, Stampede supporters and prospective supporters, and members of the community.

5.1.6 From time to time, the Calgary Stampede may work with, or utilize the services of, third parties. The Calgary Stampede may also receive personal information collected by those third parties in the course of the relationship with, or the performance of their services or otherwise. Where this is the case, the Calgary Stampede will take reasonable steps to ensure that these third parties have obtained the necessary consent to collect, use and disclose personal information to the Calgary Stampede and that the Calgary Stampede has taken the necessary steps to obtain the consent of the individual to the collection of personal information from a third party where the organization is required to do so.

5.2 How the Calgary Stampede Uses Personal Information

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5.2.1 The Calgary Stampede uses personal information and/or Personal Employee Information and/or Personal Volunteer Information for business purposes, including for the purpose of establishing, managing or terminating employment or volunteer relationships with the Calgary Stampede, and to enable the Calgary Stampede to manage, maintain and develop the organization's business and operations.

5.2.2 The Calgary Stampede will obtain consent for the use of personal information where necessary and may use personal information without knowledge or consent where permitted to or required by applicable laws or regulatory requirements.

5.2.3 Personal information may be used to:

- i) Determine eligibility for initial employment or volunteer functions, including the verification of references and qualifications;
- ii) Administer pay and benefits;
- iii) Process work-related claims;
- iv) Establish training and/or development requirements;
- v) Conduct performance reviews and determine performance requirements;
- vi) Assess qualifications for a particular job or task;
- vii) Consider promotions or changes in jobs;
- viii) Recognize outstanding service to the Calgary Stampede;
- ix) Establish a contact point in the event of an emergency;
- x) Comply with applicable labour or employment statutes;
- xi) Compile directories and telephone lists;
- xii) Provide the medical services that are sought or obtained from the Calgary Stampede's medical services provider;
- xiii) Provide uniforms and safety equipment;
- xiv) Administer parking privileges;
- xv) Process expense reimbursement requests;
- xvi) Advise of opportunities for employment or volunteer assistance;
- xvii) Share information about the Calgary Stampede, including the organizations committees, events, activities and meetings;
- xviii) Advise of fundraising campaigns, goals and opportunities to donate;
- xix) Ensure the security of the Calgary Stampede's information;
- xx) Establish, maintain and manage the Stampede's relationship with individuals so that the organization may provide, or receive, the products and services that have been requested;
- xxi) Review the products and services that the Stampede provides to individuals so that the organization may understand individual requirements for the organizations products and services and so that the organization may work to improve its products and services;

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- xxii) Review the products and services that the Calgary Stampede obtains from individuals so that the organization may understand requirements for such products and services;
- xxiii) Inform individuals of the Stampede’s products and services;
- xxiv) Inform individuals of products and services that third parties partners may wish to offer individuals;
- xxv) Comply with individuals’ requests;
- xxvi) Protect the Calgary Stampede against error, fraud, theft and damage to Calgary Stampede goods and property;
- xxvii) Enable the organization to undertake environmental, and health and safety activities, including incident planning, response and investigation;
- xxviii) Enable the organization to comply with applicable laws or regulatory requirements; and,
- xxix) Such other purposes as are reasonably required by the Calgary Stampede.

5.2.4 Personal information may also be used in the course of an individual’s participation in some or all of the programs that the Calgary Stampede may offer from time to time through various program partners, including parking privileges, Stampede Park passes, discount programs and event invitations.

5.2.5 The Calgary Stampede will not sell, rent or give away personal information to third parties for the purpose of allowing others to market their products or services to an individual.

5.2.6 The Calgary Stampede may use personal information collected to respond to:

- i) Market trends and activities impacting businesses and operations;
- ii) Media and public relations activities; and,
- iii) Interactions with Stampede employees, volunteers, program participants, Stampede Park guests, Stampede Park neighbours and members of the community.

This enables the Calgary Stampede to respond to trends and needs to better understand and operate businesses and operations and to plan for the future.

5.3 How the Calgary Stampede Discloses Personal Information

5.3.1 The Calgary Stampede may disclose personal information to employees, volunteers, contractors, consultants and other parties who require such personal information to assist the Calgary Stampede with managing relationships with individuals, including third parties that provide services to the Stampede or on the Stampede’s behalf and third parties that assist the Stampede in the provision of services to an individual.

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5.3.2 The Calgary Stampede will obtain consent for the disclosure of personal information where required by applicable law and may disclose personal information without knowledge or consent where permitted to or required by applicable laws or regulatory requirements.

5.3.3 Personal information may be disclosed or transferred to another party during the course of, completion of, a change in ownership of, or the grant of a security interest in, or an exit from all or a part of the Calgary Stampede or its various businesses or operations. For example, an asset sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations, and required to use or disclose personal information in a manner consistent with the use and disclosure provisions of this Privacy policy, unless an individual consents otherwise.

5.3.4 The Calgary Stampede may disclose personal information collected concerning:

- i) Market trends and activities impacting businesses and operations;
- ii) Media and public relations activities; and,
- iii) Interactions with Stampede employees, volunteers, program participants, Stampede Park guests, Stampede Park neighbours and members of the community.

This enables the Calgary Stampede to respond to market trends and needs, to better understand and operate businesses and operations and to plan for the future.

5.3.5 Further, personal information may be disclosed:

- i) As permitted or required by applicable laws or regulatory requirements;
- ii) To comply with valid legal processes such as search warrants, subpoenas or court orders;
- iii) As part of the Calgary Stampede's recognition of its employees or volunteers in its various publications and other communications, such as the Calgary Stampede's annual report;
- iv) To protect the rights and property of the Calgary Stampede;
- v) In conjunction with an individual's participation in some or all of the programs that the Calgary Stampede may offer;
- vi) During emergency situations or where necessary to protect the safety of a person or group of persons;
- vii) Where the personal information is publicly available; or,
- viii) With an individual's consent.

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SECURITY, CONSENT AND ACCESS

5.4 Security and Monitoring

- 5.4.1** The work product of the Calgary Stampede's employees and volunteers, whether in paper record, computer files, or in any other storage format, belongs to the Calgary Stampede. Accordingly, such work product, whether it is stored electronically, on paper or in any other format, and the tools used to generate that work product, are always subject to review and monitoring by the Calgary Stampede.
- 5.4.2** The Calgary Stampede has the capability to monitor all employees' computer and e-mail use.
- 5.4.3** In the course of conducting business, the Calgary Stampede may monitor the activities of individuals in respect to Calgary Stampede operations and property. For example, some locations are equipped with surveillance cameras. These cameras are generally in high risk areas or entrances to Park facilities. Where in use, surveillance cameras are there for the protection of employees, volunteers and third parties, and to protect against theft, vandalism and damage to Stampede goods and property. Generally, recorded images are routinely destroyed and not shared with third parties unless there is suspicion of a crime, in which case they may be turned over to the police or other appropriate government agency or authority.
- 5.4.4** Surveillance undertaken is not meant to suggest that all individuals will in fact be monitored or their actions subject to surveillance. It is meant to highlight that such monitoring may occur and may result in the collection of personal information from individuals.
- 5.4.5** When using Calgary Stampede equipment or resources, employees and volunteers should not have any expectation of privacy with respect to their use of such equipment or resources.
- 5.4.6** The Calgary Stampede endeavours to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to protect personal information from loss and unauthorized access, copying, use, modification or disclosure. The Stampede uses appropriate security measures when destroying personal information, including shredding paper records and permanently deleting electronic records.
- 5.4.7** The Calgary Stampede will notify the Office of the Information and Privacy Commissioner of Alberta, without delay, of a security

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breach affecting personal information if it creates a real risk of significant harm to individuals.

5.4.8 The Calgary Stampede retains personal information only as long as is reasonable to fulfil the purposes for which the personal information was collected or for legal or business purposes. The Stampede renders personal information non-identifying, or destroys records containing personal information when the organization no longer needs the personal information.

5.5 Notification and Consent

5.5.1 Alberta's *Personal Information Protection Act* contains provisions that deal specifically with personal employee information. The Calgary Stampede is not required to obtain the consent of an individual for the collection, use or disclosure of personal employee information and/or personal volunteer information provided that:

- i) The information is used solely for the purposes of establishing, managing or terminating an individual's employment or volunteer relationship or managing a post-employment or post-volunteer-work relationship between an individual and the Calgary Stampede;
- ii) It is reasonable to collect, use or disclose the information for the particular purpose for which it is being collected, used or disclosed; and,
- iii) In the case of an individual who is a current employee or volunteer of the Calgary Stampede the Calgary Stampede has provided the individual with reasonable notification that Personal Employee Information and/or Personal Volunteer Information about the individual is going to be collected, used and disclosed and of the purposes for which the information is going to be collected, used or disclosed.

5.5.2 For personal information, Personal Employee Information and Personal Volunteer Information, different types of consent may be obtained. Depending on the sensitivity of the personal information, an individual's consent may be express, implied or deemed (using an opt-out mechanism) in accordance with the requirements of applicable privacy legislation.

5.5.3 Express consent can be given orally, electronically or in writing.

5.5.4 Typically, the Calgary Stampede will seek consent at the time that the organization collects an individual's personal information. In certain circumstances, consent may be obtained after collection but prior to Stampede use or disclosure of an individual's personal information.

5.5.5 If the Calgary Stampede plans to use or disclose an individual's personal information for a purpose not previously identified (either

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in this Privacy policy or separately), the Calgary Stampede will endeavor to advise the individual of that purpose before such use or disclosure.

5.5.6 Opt-Out

- i) An individual may change or withdraw their consent at any time, subject to legal or contractual obligations and reasonable notice, by contacting the Calgary Stampede's Employee Services or Volunteer Services departments as appropriate.
- ii) All communications with respect to such withdrawal or variation of consent should be in writing and addressed to Employee Services or Volunteer Services as appropriate.
- iii) If an individual chooses to withdraw their consent to the use and disclosure of their personal information, the Calgary Stampede may not be able to provide the individual with certain products and services if the organization does not have the necessary personal information to do so.

5.6 Updating Personal Information

5.6.1 It is important that the personal information contained in Calgary Stampede records is both accurate and current. The Calgary Stampede will make a reasonable effort to ensure that any personal information collected, used or disclosed by the organization is accurate and complete to the extent that is reasonable for the organization's purposes in collecting, using or disclosing that personal information. If personal information happens to change during the course of an individual's relationship with the Calgary Stampede, it is the responsibility of the individual to inform to Calgary Stampede of such changes.

5.6.2 In some circumstances, the Calgary Stampede may not agree with a request to change personal information and will instead annotate the personal information under the organization's control with the correction that was requested but not made.

5.7 Accessing Personal Information

5.7.1 An individual may ask to see their personal information. To review, verify or correct personal information, individuals must contact Employee Services or Volunteer Services as appropriate. Any such request must be in writing and include sufficient detail to enable the Calgary Stampede, with a reasonable effort, to identify any record in Stampede custody or under Stampede control containing the personal information in respect of which the request is made.

5.7.2 When requesting access to personal information, the Calgary Stampede may request specific information from an individual to

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enable the Calgary Stampede to confirm the individual's identity and right to access, as well as to search for and provide the individual with the requested personal information. The Calgary Stampede may also charge an individual a fee to access personal information or for information about the use or disclosure of the individual's personal information.

5.7.3 An individual's right to access the personal information that is held by the Calgary Stampede about them is not absolute. There are instances where applicable laws or regulatory requirements allow or require the Calgary Stampede to refuse to provide some or all of the personal information that is held about an individual. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with record retention obligations and practices.

5.7.4 In the event that access to an individual's personal information cannot be provided, the Calgary Stampede will endeavour to inform the individual of the reason(s) why, subject to any legal or regulatory restrictions.

SERVICE PROVIDERS OUTSIDE OF CANADA

5.8 Use of Service Providers Outside of Canada

5.8.1 The Calgary Stampede uses service providers outside Canada to collect, use, disclose or store personal information for or on behalf of the Calgary Stampede.

5.8.2 Collection, use, disclosure or storage is occurring or may occur in the United States of America, and is subject to their laws.

5.8.3 The purposes for which the service provider outside of Canada has been authorized to collect, use, disclose or store personal information for or on behalf of the Calgary Stampede include all functions relating to the maintenance and enhancement of the Calgary Stampede's People System.

5.8.4 The Calgary Stampede will notify an individual before or at the time of collecting or transferring their personal information to a service provider outside of Canada of the way in which the individual may obtain access to written information about the Calgary Stampede's policies and practices with respect to service providers outside of Canada. Further information regarding the Calgary Stampede's use of service providers outside of Canada can be obtained by contacting the Calgary Stampede's privacy officer.

GENERAL

5.9 Inquiries and Concerns

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5.9.1 Questions about this Privacy policy or concerns about how the Calgary Stampede manages personal information can be directed to the privacy officer by telephone, in writing or by e-mail. The privacy officer will endeavor to answer questions and advise of any steps taken to address the issues raised. If dissatisfied with the response, an individual may be entitled to make a written submission to the Privacy Commissioner in the appropriate jurisdiction.

5.10 Privacy Officer

5.10.1 The Calgary Stampede has appointed a privacy officer to oversee compliance with this Privacy policy. The contact information for the Calgary Stampede privacy officer is as follows:

Privacy Officer
 PO Box 1060, Station M
 Calgary, Alberta
 T2P 2K8
 Phone: 403.261.0356
 E-mail: privacy@calgarystampede.com

5.11 Interpretation of this Privacy Policy

5.11.1 Any interpretation associated with this Privacy policy will be made by the 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".

5.11.2 This Privacy policy does not create or confer upon any individual any rights, or impose upon the Calgary Stampede or obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy policy and Canada's federal and 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.

5.12 Revisions to this Privacy Policy

5.12.1 From time to time, changes may be made to this Privacy policy to reflect changes in its legal or regulatory obligations or in the manner in which personal information is dealt with.

5.12.2 Revised versions of the Privacy policy will be communicated through regular communications channels.

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6.0 RESPONSIBILITY FOR POLICY ADMINISTRATION

The executive management team has responsibility for maintaining this policy.

All inquiries regarding the privacy policy should be directed to the privacy officer.

7.0 REFERENCES

CP-003 Code of Conduct
 Alberta's Personal Information Protection Act

8.0 RESCIND DETAIL

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