

FCN PRIVACY POLICY

(Originally adopted June 3, 2012. Amended and Approved on July 26, 2020)

PRIVACY POLICY STATEMENT

The Federation of Canadian Naturists (FCN) respects and protects the privacy of our members. The FCN shall maintain a Privacy Policy that outlines what personal information may be collected, why it is collected, how this information is stored by the FCN, and who may access this information. The collection and management of such information is governed under the Personal Information Protection and Electronic Documents Act (PIPEDA) (S.C. 2000, c. 5).

PART ONE: PRINCIPLES

1.1 - The protection of members' privacy will be the primary responsibility of the following:

- a. The Membership Secretary shall be responsible for the collection and storage of membership information.
- b. The Privacy Officer shall be responsible for overseeing operating procedures pertaining to privacy, requests for personal information and government compliance.

1.2 - The FCN will not sell, lease, or otherwise distribute or disclose any member's personal information including their postal address, telephone numbers, email address, or membership records to outside parties, except in circumstances detailed within this policy.

1.3 - In conjunction with this Privacy Policy, the FCN will establish and maintain standards of confidentiality as part of its Policy of Shared Responsibilities for Directors and Officers.

1.4 - In conjunction with this Privacy Policy, the FCN will also maintain a comprehensive Photo Policy that will include, at a minimum, the following privacy measures:

- a. Images of members and other individuals will not be reproduced or published without a photo release form that has been signed by the persons therein.
- b. Authorized images of FCN members will be used exclusively by the organization and may appear in any print or on-line publications that the FCN may produce from time to time and may be retained as part of the FCN's archive.
- c. Minors under the age of 18 who wish to be included in photos or videos must have the FCN photo release form signed by a parent or guardian.

- d. The FCN will not identify minors in any publications, written or otherwise, other than to use their initials.

PART TWO: INFORMATION GATHERING AND FCN MEMBERSHIP

2.1 - Personal information is collected in the following circumstances:

- a. When applying for membership.
- b. When registering for FCN events.
- c. When purchasing goods and services.
- d. When applying for a volunteer position.

2.2 - The FCN uses the information to:

- a. Confirm an individual's identity.
- b. Determine an applicant's admissibility.
- c. Arrange for financial transactions.
- d. Provide goods and services.

2.3 - Membership information may be gathered through the following means:

- a. Online, through the FCN web site or designated portal. E-mail or other messaging platform.
- b. A printed application form, typically used in conjunction with an event.

2.4 - When obtaining personal information, the following information is collected:

- a. Name and contact information (e.g. postal address, phone numbers, email address).
- b. Financial information to arrange for paying membership dues or event registration fees.
- c. In circumstances where safety and security is a factor for a volunteer position, a Vulnerable Sector Check or other form of Police Background Check may be included.

2.5 - If non-essential information is requested for any other reasons than those listed above, members will be asked directly for their consent, with a clear option to opt out.

2.6 - When members provides their personal information upon registering with the FCN, it is inferred that they consent to having their information retained for membership purposes.

2.7 - The FCN may include the following supplementary information in a member's account:

- a. The type of membership the individual has; such as voting, non-voting, youth, etc.

- b. Outstanding financial items and fees.
- c. Comments, concerns or suggestions.
- d. Skills and experience related to volunteer activities.
- e. Records of requests for information about the member's account.
- f. Complaints relating to that member's conduct or disciplinary actions.

2.8 - Personal information shall remain on record:

- a. For as long as necessary to fulfill the purposes for which it was collected.
- b. Information collected specifically for electronic transactions are deleted upon confirmation of each completed transaction.
- c. Member's accounts are deleted from the database after three years of inactivity, except in cases where a member is suspended by Board resolution.

2.9 - A person in possession of an FCN membership card is assumed to be the owner of the card and should immediately notify the FCN Membership Secretary upon the loss of their membership card in order to protect their privacy.

2.10- Members who wish to express concerns or offer suggestions that are concerned about their privacy may submit written documents anonymously.

PART THREE: DISSEMINATION OF PERSONAL INFORMATION

3.1 - Members' privacy is a priority. Personal information is stored securely and is only accessible to the following:

- a. The Membership Secretary
- b. The Privacy Officer
- c. The magazine distributor
- d. The web site manager

3.2 – The FCN will not share members' personal information with third parties except in the following circumstances:

- a. to process a payment (e.g. bank or credit card processing company).
- b. to facilitate the distribution of Going Natural.
- c. in medical situations where a member's health may be at risk.
- d. if required to do so by law.
- e. to assist in formal investigations by law enforcement agencies.
- f. to inform affiliated clubs or other naturist/nudist organizations of individuals who violate regulations.
- g. to collect overdue debts.

3.3- Any details of an individual's personal information that are shared in the above circumstances are done so only on an at-need basis and are to be held in confidence.

3.4 It is a member's responsibility to prove their membership in the FCN to the clubs that they are visiting.

3.5 If a member's comments are used for publicity, he or she must first provide expressed consent, otherwise only their first name and initial will be used.

PART FOUR: PROTECTING ON-LINE PRIVACY

4.1 - In addition to the information collected as outlined in the previous sections of this document, the FCN may collect additional on-line information as indicated below.

4.2 - A member's IP (Internet Protocol) address may be used to help diagnose problems with the FCN server, and to administer this web site.

4.3 - IP addresses may be used to gather broad demographic information.

4.4 - The FCN may use an on-line order form for visitors to request information or register for membership or events. To perform these functions, the following information may be collected:

- a. Visitor's contact information, including e-mail, mailing address and telephone number, along with unique identifiers.
- b. Financial information that is collected to process a transaction.
- c. When conducting an online survey, contact information (i.e. email address) and demographic information (i.e. age, income level) may also be collected.

4.5 - When collecting personal information on line, the following measures shall be in place:

- a. On-line financial transactions are transferred to an electronic payment service via a secure server and removed after the transaction is complete, except where expressed consent is given to store information for a particular purpose.
- b. Any requests for non-essential information, including the name of a spouse or affiliation with other organizations, are to be presented as optional.
- c. When registering for membership, visitors will be required to check off a "Terms & Conditions" clause to indicate that they agree to provide personal information.

4.6 - The FCN web site may contain links to other web sites. The FCN is not responsible for the privacy practices or the content of such other web sites.

4.7 - The FCN web site may make use of cookies to help to enhance the visitor's experience while viewing our content. When using cookies, the following protocols shall be in place:

- a. Visitors must be informed that the site uses cookies.
- b. The cookies shall not contain any personal information of the user.

4.8. - Web site visitors who provide personal information to the FCN shall have options for removing their information from its web site database or discontinue receiving future communications through the following means:

- a. Through e-mail, either the FCN Webmaster at webmaster@fcn.ca or the FCN Privacy Officer at privacyofficer@fcn.ca.
- b. Through Canada Post:
Webmaster or Privacy Officer
Federation of Canadian Naturists
P.O. Box 186, Station D
Etobicoke, ON
M9A 4X2
Canada

PART FIVE: ADDRESSING INDIVIDUAL PRIVACY CONCERNS

5.1 - Members have a right to know and have access to the following:

- a. What personal information about them is on file.
- b. Why that information is needed.

5.2 - Members with privacy concerns should contact the Privacy Officer, through the following means:

- a. Through e-mail: privacyofficer@fcn.ca .
- b. Through Canada Post:
Federation of Canadian Naturists
P.O. Box 186, Station D
Etobicoke, ON
M9A 4X2
Canada

5.3- In circumstances where the Privacy Officer is not available for an extended period of time, members who request access to personal information shall be advised to contact their regional representative.

5.4- The FCN reserves the right to ask for proof of identification from anyone who requests access to personal information.

5.5 - In compliance with the Personal Information Protection and Electronic Documents Act, requests from members regarding their personal information should be addressed as follows:

- a. A response should be made within 30 days. Alternatively, in circumstances that require more than 30 days, an explanation should be given regarding the need for additional time.
- b. The information should be provided at a nominal cost or no cost to the individual.
- c. Before processing a request for information, the individual should be notified of any costs involved and confirm that he/she still wants to proceed with the request.
- d. The information provided should be presented in a way that is understandable. This will include explanations of any acronyms, abbreviations and codes.
- e. Inform the individual in writing if their request or a part of their request for information cannot be responded to and the reasons why.
- f. Upon receiving access to personal information, a record of the individual's response should be retained on file, particularly:
 - i. Any changes or amendments to their personal information.
 - ii. Whether they are satisfied or dissatisfied with the response to their request.

5.6 - Any changes to personal information resulting from the individual's response shall be updated in their membership records and shared with any relevant third parties:

- a. Address any corrective measures needed to improve policies and procedures pertaining to privacy that may have been revealed as a result of the request for personal information.
- b. Any further complaints or concerns arising from an individual's request for access should be addressed as follows:
- c. Investigate any complaints received.
- d. Be willing to discuss the complaints with the individual and consider solutions.
- e. Refer the individual to Office of the Privacy Commissioner of Canada, including their web site and toll-free telephone number.