



## **JAPANESE CANADIAN CULTURAL CENTRE GUIDELINES FOR THE PROTECTION OF MEMBER INFORMATION**

### **Purpose of the Policy**

The Japanese Canadian Cultural Centre (the "JCCC") and its agents take the issue of privacy seriously. As a not-for-profit organization new PIPEDA (Personal Information Protection and Electronic Documents Act) regulations do not specifically apply the JCCC. However, in response to heightened concern around matters of personal privacy, the JCCC has developed a set of guidelines to formalize procedures necessary to ensure the privacy of personal member information (current and potential ticket buyers and donors), and to communicate these guidelines to members, staff, appointed representatives and business associates.

### **Principles**

There are 10 principles to which the JCCC aspires. These principles form the basis of the "Personal Information Protection and Electronic Documents Act" (formerly known as Bill C-6).

#### **Principle 1 – Accountability**

The JCCC has a designated a member of its staff as the Privacy Officer. This individual is responsible for the protection of JCCC member information.

#### **Principle 2 – Identifying Information and Purposes**

Personal information on JCCC members may include:

- Home and business address, telephone numbers, e-mail address
- Age and birth date
- Personal and public financial information
- Purchasing and donating history
- Medical information (related to martial arts and other special event waivers)
- Professional and personal relationships, affiliations and activities
- Artistic preferences and other personal interests
- Donation preferences
- Member communications such as letters or verbal feedback.
- Methods and preferences of JCCC communications
- Any new purpose is subject to approval by the Privacy Committee and Executive Director.

How we use this information:

- To communicate with and maintain a responsible professional relationship with JCCC members
- To understand the needs and desires of members, and to develop sales, service and donor programmes suitable to JCCC members

- To meet legal and regulatory requirements
- On occasion, we exchange names from our mailing lists with other cultural organizations we feel our members would be interested in
- Sponsorship plays a vital role in funding our operations. On behalf of our sponsors, we may occasionally share special promotions with our members.
- We do not sell our list or member information under any circumstance

### **Principle – 3 Consent**

Consent for the collection, retention and use of personal member information is implicit when members provide such information. JCCC member information is never sold, but on occasion the JCCC exchanges names and addresses from its database with other organizations that the JCCC believes would be of interest to its members. Members may request that the JCCC limit its communications with them, or specify that their names not be exchanged with other organizations, by contacting the JCCC. These requests will be implemented immediately although due to the extensive lead-time for printing and processing of our mailings, communications may not cease for a one-month period.

### **Principle 4 – Limiting Collection**

All information collected is used by the JCCC for communicating with members, for member service and for member analysis. Information that does not validly serve these purposes will not be collected or retained.

### **Principle 5 – Limiting Use, Disclosure and Retention**

Personal information shall not be used, stored or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

### **Principle 6 – Accuracy**

The JCCC makes every effort to create and maintain accurate electronic-data and hard-copy files. The JCCC updates all files when new information becomes available or is provided

### **Principle 7 – Safeguards**

The JCCC has processes and procedures in place to ensure security safeguards for member information. Only authorized JCCC staff, or its agents, such as Ticketmaster, may have access to member information. These agents are bound by contract to the JCCC privacy policies and procedures.

### **Principle 8 – Openness**

This Policy shall disclose the principles that the JCCC will strive to maintain. Inquiries or complaints regarding any aspect of this Policy should be directed to the Privacy Commissioner.

### **Principle 9 – Individual Access**

Upon request, a JCCC member shall be informed of the existence, use and disclosure of his or her personal information, and shall be given access to that information. The accuracy or completeness of such information will be amended as appropriate.

**Principle 10 – Challenging Compliance**

All inquiries or complaints regarding the JCCC's compliance with these guidelines should be directed to the Privacy Officer.