

Personal Information & Privacy Policy

1. Preamble

This document describes the policies and practices of the Esquimalt Community Arts Hub (ECAH) regarding the collection, use and disclosure of personal information of those who interact with ECAH; including the steps ECAH takes to ensure personal and financial information is handled appropriately and securely. This policy aligns with the Personal Information Protection Act, the legislation that governs information practises for a variety of different types of organizations, including not-for-profit societies.

ECAH is dedicated to protecting your privacy. For example, we collect information as part of the following processes:

- Commercial activity, such as, registration for courses, workshops and events; and Participating in our sales programs;
- Email communications;
- The exhibit process;
- Other initiatives from time to time.

Our policy is to receive express consent when collecting personal information and that any collected data is safeguarded to the best of our ability. We will not share your data with others without express consent or as required by law.

In this policy "personal information" means any information about an identifiable individual, as further defined under British Columbia's Personal Information Protection Act or other applicable laws. Personal information excludes the name, position name or title, business telephone number, business address, business email, and business fax number of an individual, as well as any publicly available information as designated under applicable laws, such as information available from a public telephone directory or from a public registry or online public website or profile.

2. Identifying purpose

ECAH will, before or at the time personal information is collected, identify the purposes for which the information is collected, used and disclosed.

3. What information does ECAH collect and how is it used?

3.1. Becoming a member

- Information collected: Name, Address, Phone Number, Email
- Collection method: Website (Squarespace), Payment Processor (Stripe), Telephone, Email
- Storage: Google Drive
- Purpose: Memberships are filed under residential address and name. We use phone and email to contact and communicate with our members.

3.2. Calls for submissions

- Information collected: Name, Email, Optional Information such as links to portfolios
- Collection method: Website (Squarespace), Telephone, Email
- Storage: Google Drive, Gmail
- Purpose: To review submissions and communicate with submitters.

3.3. Sales Program (selling and buying)

- Information collected: Name, Address, Phone Number, Email, Business Information
- Collection method: Website (Squarespace), Payment Processor (Stripe)
- Storage: Google Drive, Email, RBC Online Banking, Accounting Software (Wave)
- Purpose: To review submissions and communicate with artisans and artists. To ensure compliance with CRA tax requirements. To remit payments.

3.4. Gallery visits

- Information collected: First Name, Phone, Email (optional)
- Collection method: Paper, Excel Spreadsheet
- Storage: Google Drive, Physical Files
- Purpose: COVID-19 contact tracing. Optional eNewsletter opt-in.

3.5. Workshops and classes

- Information collected: Name, Phone, Email, Credit Card
- Collection method: Website (Squarespace), Payment Processor (Stripe), Telephone, Email
- Storage: Google Drive, Website (Squarespace), Payment Processor (Stripe), Email
- Purpose: To register people for workshops and classes. To process payments. Optional eNewsletter opt-in. COVID-19 contact tracing.

3.6. Board member / Committee Member dossiers

- Information collected: Name, Email, Phone, Address, Work History and Information related to performing duties as a director, Information as required by the B.C. Societies Act.
- Collection method: PDF, Google Drive
- Storage: Google Drive, Email
- Purpose: To comply with the B.C. Societies Act. To review Board Director applicants and identify skill sets.

3.7. Surveys

- Information collected: Personal Opinions, Other Metrics;
- Collection method: Google Form, other electronic forms, eNewsletter
- Storage: Google Drive
- Purpose: This data may be aggregated and shared publicly or with partners to demonstrate user experiences and trends.

4. COVID-19 Contact Tracing

As per Vancouver Island Health guidelines for employers, we collect personal information for COVID-19 Contact Tracing. We collect the personal information from 1 person in a party including Full Name, Telephone Number and Email Address. In the event of a COVID-19 exposure, we will share this information with Vancouver Island Public Health who will advise us upon next steps.

We collect this information on paper and store it for 30-days inside a secure filing cabinet.

5. Limiting Collection

ECAH will limit the personal information collected to that information necessary for the purposes identified by the gallery.

6. Consent

ECAH will obtain consent of the individual for the collection, use or disclosure of personal information except where the law states exemptions, grants permission, or creates a requirement for collection, use, or disclosure of personal information.

In some cases, when communication is over the telephone, your consent to the use and/or disclosure of your information will be obtained verbally. In other cases such as when you communicate through email, your consent will be obtained electronically.

ECAH will require consent for the collection, use and disclosure of personal information from a legal representative, such as a legal guardian or a person having a power of attorney for minors under the age of 13, or a person who is seriously ill, or mentally incapacitated.

For minors over the age of 13, ECAH will apply the following test:

- Is the individual able to fully understand the consequences of their privacy choices, particularly in this age of complex data-flows?

If ECAH is confident that that the individual is able to fully understand the above, then they will be deemed capable of providing meaningful consent.

7. Implied and Express Consent

Sometimes consent is implied, like when someone signs up for a class and gives their name, telephone number and email address as part of the registration process. You are deemed to have consented so that ECAH can communicate with you about the class prior to its start. Your consent is implied because you have provided information for an obvious purpose and a reasonable person would think it is appropriate in those circumstances. If the purpose of the collection is not obvious, ECAH will require your express consent.

8. Disclosure of Personal Information

ECAH may disclose an individual's personal information to others in connection with the purpose for which it was collected, as consented to by the individual, or as required or permitted by law. The following are some examples of how ECAH may disclose personal (or business) information:

- Sharing participant names with an instructor;
- Sharing artist or artisan public contact details with prospective buyers (business information).

9. Storage (and Transmission) of Personal Information

We use the following digital programs for the following purposes:

Program	Data	Purpose	How your information is protected
Squarespace	Memberships, class registrations, artist submissions.	ECAH website	Squarespace adheres to Privacy Shield Principles. SSL certificates to encrypt data in-transit between website end users and customer domains
Stripe	Name, address and payment details	Processing payments	All card numbers are encrypted at rest with AES-256. Stripe adheres to Privacy Shield.
Gsuite (Google Drive, Gmail, Google Business etc.)	Email communications, database of ECAH members, newsletter mailing list, organizational materials	Email, file storage, collaboration tool	ECAH stores personal information in secure folders and with restricted access (only ECAH representatives who need to handle your information have access).
Slack	Written communications	Direct messages between board members	Limited personal information shared on Slack
Zoom	Spoken word between the conversing parties	Video conferencing: information sessions, online classes	ECAH will not record sessions without your express consent.

MailChimp	Name, email address.	Share information and communicate.	MailChimp adheres to rigorous international privacy and data security standards.
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10. Data Collection on Paper

Sometimes ECAH will collect personal information with pen and paper, and subsequently transfers this information to our electronic files. When we do this, ECAH commits to transferring your information to an electronic file as soon as possible and in a secure manner, and to securely disposing of the paper record of your personal information.

11. Website / Email Security

No data transmission over the Internet or any wireless network can be guaranteed to be perfectly secure. Therefore, while we try to protect your personal information, ECAH does not guarantee the security of information transmitted to or from www.ecah.ca or via email to the organization or between online programs such as Gsuite, Squarespace or Stripe.

12. Cookies & Digital Tracking

The ECAH website uses cookies and similar technologies, which are small files or pieces of text that download to a device when a visitor accesses a website or app. For information about viewing the cookies dropped on your device, visit [The cookies Squarespace uses](#).

- [These functional and required cookies are always used](#), which allow Squarespace, our hosting platform, to securely serve this website to you.
- [These analytics and performance cookies](#) are used on this site, as described in linked text, only when you acknowledge our cookie banner. We use analytics cookies to view site traffic, activity, and other data.

13. Website Links

Our site contains links to other sites, which are not owned or controlled by ECAH. Please remember that our privacy policy does not apply to other sites and that we cannot be responsible for their privacy policies, if any, nor can we be responsible for the content on those sites.

14. Retention of Personal Information

Personal information will only be retained for the period of time required to fulfill the purpose for which it was collected. Once the personal information is no longer required to be retained to fulfill the purposes for which it was collected and is no longer required or permitted to be retained for legal or business purposes, it will be destroyed or made anonymous.

15. Privacy Training

ECAH will familiarize all those representing ECAH (e.g. board members, employees, volunteers, instructors?) with this Personal Information and Privacy policy prior to the representatives handling any personal information.

16. Questions, Concerns and Feedback

Get in touch with ECAH's Privacy Officer at: privacy@ecah.ca to:

- Request access to and verify your personal information Update outdated or incorrect information
- Ask questions or provide feedback about ECAH's privacy, confidentiality and personal information handling policies and practices.

If you have unresolved concerns about the way that ECAH has handled or processed your personal information, you may contact the [Office of the Information and Privacy Commissioner](#).

17. Access to ECAH's Society Records

To access Esquimalt Community Arts Hub society records on file at B.C. Registries and Online Services, visit the [Government of BC webpage](#) that explains how to do this. The following are examples of types of Society records held by the B.C. Registries:

- Status - the company is active or not active
- Recognition/incorporation date – when they were incorporated, registered, amalgamated within B.C.
- Last Annual Report - with date filed
- Registered office address
- Names of Directors, Officers – often included in annual reports