

**Toronto Camera Club:
Policy for the Protection of Personal Information**

As Approved by the Board April 14, 2026

What is personal Information?

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual.

In the case of members of the Toronto Camera Club, personal information can relate to Club members and non-members, including (where applicable) name, address, telephone number, email address, and disciplinary actions.

Scope of application

This policy applies to personal information collected, retained, stored (electronically or in hard copy), used, or disclosed by, or on behalf of, the Club and its members. This includes personal information of current and former Club members, and other persons who have dealings with the Club, including persons who enter competitions or purchase goods or services from the Club.

This policy does not apply to personal information of members and non-members collected when persons submit images to the Toronto International Salon of Photography, as the latter has its own privacy policy.

Approval of this policy

Approval of this policy and any changes is the responsibility of the Board of Directors.

Awareness of the policy

The policy will be available on the public side of the Club's website. The policy will also be referenced, and a link to the applicable page on the website will be provided, in documentation related to:

- Applications for Club membership and renewal;
- and
- Forms related to interactions between the Club and non-members, including the purchase of goods or services through the e-commerce portal of the Club website.

Persons of Responsibility (PORs) with access to personal information, including those who are given access to the "member look up" function of the Club website, will be advised of this policy upon its approval, or, in the future, when they are granted such access.

Consent

No personal information will be collected, retained, stored, used or disclosed without the consent of the individual to which the information relates, unless required by law.

Explicit consent will be obtained from:

- Non-Club members when they apply for membership and members when they apply for renewal; and
- Non-members when they interact with the Club, including the purchase of goods or services through the e-commerce portal of the Club website.

Consent will be obtained through checking a box that sets out the terms and conditions that must be met for a transaction to be completed.

Compliance by Club members

Club members will commit explicitly to complying with this policy when they become members, and when they renew membership. This commitment will be made through checking a box that sets out the terms and conditions that must be met for a transaction to be completed.

Data collection

Personal information will be collected only when needed to support the purposes of the Club and Club administration or where required by law. The Club will identify, for each current and potential data element, how the data is collected and the reason why this information is needed. This information will be set out in a Data Element Table.

Data retention

The Club will establish a data retention schedule for personal and other information, including which data is to be retained for persons who are no longer members of the Club. Such information will not be retained if it is no longer needed to support the purposes of the Club or Club administration. However, some information may need to be retained indefinitely (e.g., former member names, competition division, awards, competition and honour point totals), as members may wish to rejoin the Club on a later date.

Data protection

The Club and individual members will protect personal information held electronically or in hardcopy through the application of reasonable safeguards against loss or theft, as well as unauthorized access, disclosure, copying or modification.

In particular, the Club's website will include industry-standard security features. Access will be limited to designated administrators and persons of responsibility and will be password protected. The Club will not collect or store credit card information but will use a third party that complies with industry standards to process credit card transactions.

The Club website may employ third-party software to, for example, manage internal competitions. Agreements with third parties will ensure that they comply with Club policies concerning personal information.

The Club website may have links to third-party websites, whose privacy policies and protections may differ from those of the Club. The Club is not responsible for the privacy policies of other websites or organizations.

Use of cookies

Persons using or accessing the Club's website, consent to the Club's use of Cookies, allowing the website to remember important information that will make your use of the website more convenient. Cookies are used to determine if you are logged in or not and will remember some of your settings to improve your online experience. Cookies are not used to collect, store or share any sensitive or personally identifiable information.

Data access and disclosure

Access to, and disclosure, of personal information by the Club and its members is strictly limited and is governed by the following, unless required by law. This restriction on access applies to the sharing of personal information among Club members, and with non-Club members.

Access to own information

Members will have a right to access their own personal information. Following the entry of a username and password, members will be able to review their information.

Members may correct/update their contact information by clicking on 'Update' at the top of the membership update page. Changes made will be reflected in the Club's databases instantly. If a member wishes to delete their account, they may contact the Website Chair, as listed on the Club website.

Access to other member information

Access to a general list of members, and personal information associated with each, is limited to the Executive, Officers, the Communications Chair, the Membership Chair and the Website Chair.

Specific information related to members may be made available to certain Club PORs in accordance with their duties. Such access may be granted by the President, the Communications Chair, the Membership Chair or the Website Chair.

Certain PORs will be able to "look up" members, on an individual basis, and see their telephone numbers, email addresses, membership status and competition division. Such access will be granted where they have a need for that information based on their Club responsibilities.

Telephone numbers will not be shown when the lookup function is used if such a restriction is requested on the application or renewal form, or through a member's update of their online information.

Disclosure of information through the Club website

The Club website will not contain a general list of members.

The public side of the website will not contain any personal information for Club members or non-members, other than contact names and Club email addresses for the Club in general or Club events.

Members will be able to access a list of POR names and their positions on the "Club contacts" area of the website.

The website advises that email addresses for Club members are assigned by the Club and gives their format, so that they can be used by a member to contact another member where the latter's name is known (e.g., as listed in Club contacts).

Members have the option of creating personal profiles in the Member-only area of the website. If created, other Member can view those personal profiles.

Disclosure of information through Club communications

This subsection is applicable to e-mails and other correspondence, chat groups, social media posts, publicity materials and other communication materials sent by, or on behalf of, the Club.

Such communications materials will generally not disclose personal information. However, the Club may provide names and club emails of PORs, or highlight the names of members who have been successful in competitions, who have been awarded trophies, or who have received other honours or awards.

Photographic images made by Club members, together with information identifying the maker, may be displayed in the Club, published on the Club website, or used to promote the Club, such as in social media.

Generally speaking, emails sent to several Club members by a POR will be constructed so that recipients cannot see the names and personal email addresses of others (e.g., through utilization of the "BCC" field). To ensure compliance and consistency with this approach, "broadcast" emails sent to a range of recipients may only be sent out by the President, the Communications Chair, the Membership Chair, or the Website Chair.

However, to facilitate Club collaboration and meeting planning, contact information may be shared among Club members involved in an activity.

Disclosure of information to third parties

Club members will not disclose personal information to third parties, other than Club e-mail addresses of Club representatives during business correspondence.

Complaints

A member who has a complaint about the protection of personal information should contact the President. Complaints will remain confidential and not be shared with the Membership except as noted below.

The President or a Club member(s) assigned by the President will investigate the complaint. The complainant will be interviewed. If the complaint involves the conduct of another club member, that person will be contacted. A confidential report will be prepared that addresses the nature of the complaint, the merits of the complaint, and the extent to which the matter has been resolved. The report will also recommend further action, where appropriate. The Board will receive and review the report, meet *in camera*, and, if necessary, decide on further action. The President will advise the parties of the Board's decision.

A failure to comply with this policy is a serious matter, and may lead to disciplinary action against Club members, including termination of membership by the Board of Directors, in accordance with the By-laws.

Notification of changes to policy

Members will be notified should there be a change to the data collected or the methodology for doing so, and should there be a change to this policy

Questions and concerns

Questions or concerns about the content of the policy should be directed to the By-law and Policy Review Committee.