



## **THE ROYAL CANADIAN LEGION PRIVACY POLICY**

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### **PRIVACY POLICY**

As of January 1, 2004, all businesses engaged in commercial activities must comply with the *Personal Information Protection and Electronic Documents Act*, and the *Canadian Standards Association Model Code for the Protection of Personal Information*. At Dominion Command we are committed to respecting your privacy. This policy describes how we collect, use and disclose personal information concerning members and other individuals. This policy may be modified from time to time by posting updated versions on the Dominion Command website or through notifications published in the Legion Magazine and its associated website.

### **PERSONAL INFORMATION**

Personal information is information about an identifiable individual. This information includes the full name, address, telephone number, date of birth, email address, and any other information that identifies a person or would allow someone to contact that person. Personal information only becomes known to Dominion Command when that person provides it to us, with consent.

### **CONSENT**

Dominion Command will collect personal information from individuals, and use it and disclose it only with consent received from them or from an authorized individual on their behalf, unless otherwise required or allowed by law. Prior to collecting personal information, it is our policy to identify the purposes for doing so and to limit the collection, use and disclosure of personal information to those purposes. There will be occasions where we will rely on consent with respect to contacting members with offers that we feel will be of interest to them.

### **COLLECTION AND USE OF PERSONAL INFORMATION**

If an individual is a Legion member, applies for a job at Dominion Command, participates in a Legion sponsored program or a competition, or seeks assistance from Dominion Command, personal information will be collected as described within this policy and as requested at the time of collection. Personal information may be collected through the membership office, service bureau, by interaction with the Legion Web Site, as part of a survey or competition or from an individual in person. It is our policy to collect personal information about an individual directly where possible, except where personal information will be collected from a third party with that individual's consent.

## **THE ROYAL CANADIAN LEGION MEMBERSHIP AND MAILING LISTS**

The Royal Canadian Legion's membership list, as held by Dominion Command, includes the information contained within the *Application for Membership* form. This information is used to communicate with individuals by mail or otherwise. Other mailings, such as the Legion Magazine, are provided by Dominion Command on a similar basis.

Dominion Command does not rent, sell or exchange the names of members to any organization or advertiser. With the consent of Dominion Convention, Dominion Command may provide a partner in the Member Benefits Package with members names and addresses only, to advise of products and services offered. Since 2004 new members are required to give their consent, or otherwise, to this procedure by signing the *Privacy Statement* on the *Application for Membership* form. Members prior to 2004 will have their information made available unless Dominion Command is notified otherwise by completing the *Membership Data Change* form, by letter or E-mail, or verbally by phone or in person.

At times individuals may be asked to participate in research surveys in which Dominion Command will provide that individual's address or telephone number, or both, to a third party research firm to conduct market research studies on behalf of Dominion Command. Any survey of this nature is for internal Legion use only. All the individual information provided, when collected in the course of a survey, including any personal information and survey answers, is used only on an aggregate basis for Dominion Command's internal market-research studies. An individual may withdraw their consent to this at any time.

## **NATIONAL COMPETITIONS AND PROMOTIONAL EVENTS**

Dominion Command or its membership benefits partners may offer various promotions from time to time. When an individual enters a promotional contest, they may be asked for their name, date of birth, address (email and/or residential) and phone number so that contact can be made in the event that that individual is a winner and so that verification can be attained in regard to legal age requirements. Other information related to the promotion or contest may be requested if required by law.

For national contests, competitions or like events, personal information may be disclosed to the general public as part of the promotion of the event as well as the reporting of the results. In each case consent will be solicited upon entry into that event.

## **SERVICE MEDICAL DOCUMENTATION & RECORDS (SMD/R)**

In providing representational services to serving military members, veterans, RCMP members and dependants for a disability pension or a disability award, the Dominion Command Service Bureau is responsible to ensure that SMD/R are used, stored and protected in a manner that ensures the confidentiality of this information and the privacy of individuals in accordance with all federal and provincial legislation and regulations. In that respect, Legion service officers are bound by the terms of the Privacy Act, the Pension Act, and the Canadian Forces Members and Veterans Re-establishment and Compensation Act that regulate access to, handling and disposal of this documentation.

All Legion staff that handle SMD/R are briefed on the appropriate use, storage, protection, disclosure and disposal. These individuals must also undertake an enhanced security check. Dominion Command has put in place physical, organizational, and technological safe guards to protect this sensitive information against theft and loss, as well as unauthorized access, copying, use, and disclosure.

## **FINANCIAL ASSISTANCE**

The Legion is active in assisting veterans and their families who are in need of financial assistance or benefits made available to them through a myriad of programs and funds. Upon application for financial assistance, service officers will collect personal information, as required, in regard to an individual's finances and the ability to secure income. Service officers will ensure the amount and type of personal information collected, used or disclosed is limited to that which is necessary to fulfill the purpose for which it was collected. Unless the law requires disclosure or authorizes sharing of this information with others, Dominion Command will not give out any personal information without the consent of the individual involved.

## **EMPLOYMENT OPPORTUNITIES**

Dominion Command offers employment and volunteer opportunities as required. If an individual applies for a job or a volunteer position at Dominion Command, they will be asked to provide their name, telephone number, address, email address, and other information concerning the application such as employment history, references and education. Additionally certain positions will require a police verification check. This information will be used for contact purposes and to review the application including contacting any references or any other third parties that

may have been consented to our contacting and discussing the applicants work history and related matters.

## **DOMINION COMMAND WEBSITE - WEBSITE USE**

Dominion Command website uses “cookies” that identify return visitors. A “cookie” is a piece of data that a website can send to the browsers of visitors' computers and that may then be stored on the hard drives of their computers. When visitors return to the Legion website, information can be tailored more readily to suit individual visitors' preferences. The goal is to improve efficiency and effectiveness and to measure website activity. Browser software such as Netscape and Internet Explorer allows the disabling of “cookie” collection if users wish or may inform users when a “cookie” is being stored on a user's hard drive. The operating system for the Legion website may automatically record some general information about visitors such as:

- The internal domain for visitors' internet service provider and the IP address of the computer accessing the website.
- The type of browser visitors are using.
- The type of operating system visitors are using.
- The date and time of the visit to the website.
- The web pages that visitors viewed on the website.
- The previous website accessed by visitors (if linked to another site).

The Legion website uses “cookies” (e.g., the Self-Learning Program) to allow members to return to the page that was last accessed. The program also keeps track of what site areas were accessed. Dominion Command uses website information for statistical analysis, to tailor the Legion website to its visitors and to store non-personal information and to track internet traffic patterns on our website. The information is collected in an anonymous and aggregate form to compile general statistical data. “Cookies” does not give access to any users personal information.

The Legion website contains links to other sites. Once visitors link to another site, they are subject to the privacy policy of the new site. Dominion Command encourages its visitors to read the privacy policies of all websites visited, especially if personal information is shared.

At times Legion.ca makes message boards and contact systems available to its users. It should be noted that any information that is disclosed in these areas becomes publicly readable information and users should exercise caution when deciding to disclose any personal information.

## **DISCLOSURE**

Dominion Command may disclose personal information with consent to third parties to provide individual services, as required by applicable law, or as otherwise set out in this policy. Dominion Command is continuously seeking ways in which to better serve its members and clientele and may therefore also disclose personal information to allow personal contact to other organizations that may have affiliated programs with Dominion Command or offers of individual interest. Dominion Command will do so only with your consent, which you may withdraw at any time.

## **PARTNERS AND RELATED SERVICE SUPPLIERS**

Dominion Command may provide individuals the opportunity to access products and services from third parties through promotions, the Legion Magazine, or its web-site. Those third parties may collect, use and disclose personal information in order to provide their products or services. The collection, use and disclosure of personal information by those third parties will be governed by their privacy policies and any consent provided by the user. Unless Dominion Command advises otherwise, there is no access to or control over personal information collected from the user by those third parties. Users of this third party option are encouraged to review the applicable privacy policies of that third party.

## **SECURITY**

Dominion Command has in place security measures and procedures to ensure that personal information is protected from misuse and from unauthorized access, however, no data transmission over the Internet can be guaranteed to be 100% secure. As such, the security of any information transmitted via the Internet cannot be fully guaranteed by Dominion Command.

## **RETENTION OF INFORMATION**

Personal information collected by Dominion Command is retained for as long as it is reasonably required for the purposes for which it was collected, or as required by law, following which it is securely destroyed, made anonymous or archived. If individuals withdraw their consent to Dominion Command retaining their personal information they will be advised as to the consequences, if any, of this action.

## **ACCESSING YOUR PERSONAL INFORMATION**

Individuals can contact Dominion Command if there are any questions or concerns about this policy or the accuracy and completeness of any information on their file. If an individual wants to update any of their information, or would like to see a copy of the information Dominion Command has on them, or an account of the use that

has been made of this information contact Dominion Command. To do so, simply contact the Dominion Command Privacy Officer by phoning (613) 235-4391.

Individuals may also use the above information to withdraw any consent they have provided, or to register a concern or complaint with Dominion Command. In most cases, Dominion Command will require that requests for information or withdrawal of consent be received by us by E-mail, fax, and mail or otherwise in written form. Dominion Command will also require that individuals provide sufficient information to allow for the location of that information in order to deal with any request.

## **INQUIRIES**

It is Dominion Command's policy to respond to all inquiries, requests for access to personal information, requests for removal of consent and concerns or complaints within 30 days of our receiving them unless otherwise required by law. If a response cannot be made within 30 days, the originator will be advised of this within 30 days. Dominion Command cannot give individuals access to personal information that would disclose personal information concerning another individual without their consent, or that cannot otherwise be disclosed under law.

## **OFFICE OF THE PRIVACY COMMISSIONER**

Should there be an issue that requires clarification outside the content of this policy inquiries can be directed to the Office of the Privacy Commissioner. The Commissioner works independently from any other part of the government to investigate complaints from individuals with respect to the private sector. For matters relating to personal information in the private sector, the Commissioner may investigate complaints under Section 11 of the *Personal Information Protection and Electronic Documents Act*. As an ombudsman, the Commissioner prefers to resolve complaints through negotiation and persuasion, using mediation and conciliation if appropriate.