

The Sid Williams Theatre Society (SWTS) is committed to protecting the privacy and security of the personal information that patrons share with us. We understand that your privacy and personal information are important to you, so we make every effort to ensure that the details you share with us are collected and recorded accurately, stored securely, and used only as you have asked us to do so.

The following Privacy Policy provides information on how we collect, use, and safeguard the personal information provided to us in order to ensure that the way we handle it complies with the provisions of British Columbia's Personal Information Protection Act (PIPA) and Canada's Anti-Spam Legislation (CASL).

DEFINITION OF PERSONAL INFORMATION

Patrons are defined as ticket purchasers, contest participants, members, outreach program participants, rental clients, and other community members that participate in programs or events with the SWTS.

Personal information is any information that is identifiable to you as an individual. This may include, but is not limited to, name, age, date of birth, language of correspondence, address (mailing and billing), email address, phone number, membership and ticket history, donation records, payment information, or business information such as SOCAN or registration numbers.

Personal information does not include any publicly available information about an individual.

COLLECTION OF INFORMATION

The personal information we collect varies depending on the service provided.

Information is collected by a variety of methods: phone, email, mail, fax, social media, online, or in-person.

We may collect, use, or disclose personal information without the patron's knowledge or consent in limited circumstances:

- When the personal information is available in a public domain (e.g., a telephone directory or web listing)
- In an emergency that threatens an individual's life, health, or personal security
- When we require legal advice or to investigate an anticipated break of an agreement
- For the purposes of debt collection
- To protect ourselves from fraud
- When the collection, use, or disclosure of personal information is permitted or required by law

USE OF INFORMATION

The SWTS uses personal information to better serve our patrons and the broader arts and culture community. This includes using the information to:

- To verify patron identity
- Identify patron preferences
- Process tickets, financial transactions, and deliver requested services
- Notify patrons of changes or cancellations
- Provide information about programming and services
- Ensure ENCORE! members receive the full benefits of their membership
- Issue invitations to events
- Solicit donations

- Send e-newsletters
- Provide reminders and announcements of upcoming events
- Ensure a high standard of service to patrons
- Collect feedback
- Thank supporters
- Generate statistics for fundraising, reports, or marketing purposes
- Comply with security regulations based on reducing fraud in credit card purchases
- Provide event services to rental clients

The SWTS is committed to using personal information in a respectful and useful manner.

We will not collect, use, or disclose personal information except for the identified purposes listed above, unless we have received additional consent or the processing is authorized without consent.

Patrons may decline at any time to provide some or all of the information requested, may request to have their patron records amended to remove information, or may request a stop to the way their patron information is used; however, these actions may limit the services we are able to provide. We will diligently and promptly comply with all such requests provided doing so does not frustrate the performance of a legal or contractual obligation.

DISCLOSURE OF INFORMATION

The SWTS will not sell, trade, or rent your personal information to any third-party organization that does not have a direct business relationship with the SWTS.

Event presenters – any individual, business, or organization that rents the venue to host an event or engages the SWTS box office services for external events – are considered to have a direct business relationship with the SWTS. This means patron information of first name, last name, mailing address, email address, and ticket type(s) purchased may be shared with event presenters when they submit a request. Event presenters are required to sign a privacy protection document, where they commit to only using the information for event promotion and event communication purposes, prior to receiving the information.

We use some external suppliers to assist us in various functions such as processing online payment transactions, event ticketing, issuing email, collecting feedback and conducting surveys, and generating statistics. We only use suppliers that we trust to manage information with the same level of sensitivity as we do. Any suppliers we use to process payment transactions follow Payment Card Industry (PCI) compliance protocols.

The SWTS may be required to provide information to external parties in the following cases:

- when the collection, use, or disclosure of information is allowed or required by law (i.e. authorized by police, fire department, government, legal document); and
- in an emergency that threatens an individual's life, health, or security.

STORAGE OF INFORMATION

We are committed to ensuring the security of our patrons' information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification, disposal, or other similar risks. We will employ security measures that are appropriate to the sensitivity of the information.

Personal information in hard copy form is stored in locked filing cabinets and is shredded and securely disposed when it is no longer needed. Only authorized SWTS personnel have filing cabinet keys.



PRIVACY POLICY

Personal information in electronic form is stored with software providers who are committed to the safety and security of their client data. All software accounts require user credentials and applicable levels of permissions to access personal information. Depending on the sensitivity of information, data encryption is also used. Only authorized SWTS personnel have access to financial information.

The SWTS network and computer hardware are protected by a firewall and are monitored 24/7 as part of a managed IT support contract with a confidentiality and non-disclosure agreement in place.

SWTS staff receive training in relation to all of our policies and procedures for protecting patron information. All staff and volunteers are required to provide a clear criminal record check as a condition of employment and volunteer program participation.

INTERNET USAGE INFORMATION COLLECTED

Links to Other Websites

The SWTS website contains links to other sites (e.g., community links, event presenter links, and performer links). Please be aware that the SWTS cannot be held responsible for the privacy policies of other sites. The SWTS's privacy policy applies solely to information voluntarily supplied or automatically collected on this website.

Cookies

We use cookies – a session cookie is temporary and only valid while navigating our website before it is discarded – to keep track of your shopping cart while you move around our website and to grant access to the “My Virtual Events” page. These cookies don't collect personal information and aren't used for advertising.

You can erase or block cookies on your computer, however, this action may affect your ability to use our website.

Log Data

Our website platform enables some anonymous information about website visitors to be automatically gathered and temporarily stored. This information includes the IP address of the computer you use to access the SWTS website, the type of browser used, the type of operating system used (Windows, MacOS, etc), the type of device used, the pages you accessed, how long you spend on each page, and the website from which you've linked directly to our website, if applicable. Analytics help us to measure our website traffic, assess the effectiveness of our website and services, to understand visitor engagement, and to tailor content to visitor interests. This data helps us to improve our website and is available only to designated staff who require this information to perform their duties.

The SWTS' website uses Google Analytics to collect log data. Google Analytics uses first-party cookies to report on user interactions on Google Analytics customers' websites. These cookies are used to store non-personally identifiable information. Browsers do not share first-party cookies across domains. For further information on the privacy policy concerning Google Analytics, please see <https://policies/google.com/privacy?hl=en-US>.

ACCOUNTABILITY & ACCURACY

The SWTS makes every effort to ensure that the information you share with us is complete, recorded accurately, retained, and disposed of securely, and used only for purposes for which you would reasonably expect it to be used.

Patrons with inquiries regarding changes to their personal information or adding to their personal information should contact the SWTS and we will correct any errors or omissions in any personal information under our control.

INDIVIDUAL ACCESS & CHALLENGING COMPLIANCE

Patrons have the right to request information recorded in their patron file or inquire how their information is stored and used. This request must be made in writing and provide sufficient details to identify the information being sought. Patrons may be required to prove their identity before discussing a request that involves their personal information or discussing any complaint.

The SWTS has thirty (30) business days to provide you with this information.

Requests or inquiries can be submitted via phone 250-338-2430 or email or hard copy to the following addresses:

gm@sidtheatre.com

Sid Williams Theatre Society

442 Cliffe Avenue
Courtenay, BC
V9N 2J2
Attention: General Manager

Patrons who are not satisfied with how the SWTS performs its duties under PIPA may contact the Office of the Information and Privacy Commissioner for British Columbia at 1-800-663-7867 or PO Box 9038 Stn. Prov. Govt., Victoria, BC V8W 94A.

Sid Williams Theatre Society – Policies – Privacy Protocol

Updated February 2019

Employees and Patrons

The General Manager or designate shall take all steps required to ensure the privacy of the Society's patrons, employees, directors and officers by enforcing the following Privacy Protocol which calls for information about such persons and organizations to be treated in the manner which "personal information" and "employee personal information", must be treated pursuant to the **Personal Information Protection Act** (BC) (the "Act").

DEFINITIONS

In this Privacy Protocol, capitalized terms shall have the following meanings ascribed to them:

- a. **"Employee"** means any person who provides services to the Society, whether that person is paid or unpaid (volunteer):
- b. **"Employee Personal Information"** means information about an Employee of the Society that is collected, used or disclosed solely for the purposes reasonably required to establish, manage or terminate the employment or volunteer relationship between the Society and the Employee but does not include Patron Information that is not about the Employee's employment;
- c. **"Patron"** means any person or organization which is:
 - (i) a member, director or officer of the Society; or
 - (ii) the purchaser of a ticket for a Theatre performance or event;
- d. **"Patron Information"** means information collected by the Society relating to any Patron; for rental, SWTS-presented or partnered events in the Facility, or for events using the SWTS Box Office to sell tickets, patron information may be used in accordance with this policy and provincial/federal legislation by the SWTS, and the event presenter, producer.

PROTOCOL

1. The Society designates the General Manager as the individual charged with responsibility to:
 - a. enforce compliance, by the Employees of the Society, with the requirements of the Act and this Privacy Protocol; and
 - b. respond to complaints concerning compliance by the Society with the Act or this Privacy Protocol.

The General Manager may be contacted for the above purposes through the telephone or email facilities of the Theatre.

2. The General Manager shall be entitled to delegate administrative functions arising pursuant to the Act and this Privacy Protocol to Society Employees on such terms as may, in the judgment of the General Manager, be necessary or desirable.
3. Prior to collecting Patron Information, the Society shall advise the Patron or Employee, as the case may be:
 - a. of the purpose of collecting such information; and
 - b. on request of the Patron, the contact information of the General Manager with the advice that the General Manager is the person who can answer the Patron's or Employee's questions concerning the collection of such information.
4. The Patron shall be deemed to have consented to the collection and use of Patron Information or Employee Personal Information if, at the time such information was given:
 - a. the Patron appeared to understand the purpose of the collection of the information; and
 - b. voluntarily provided the information for the purpose.
- c. The Privacy Policy shall be available digitally to patrons purchasing tickets online.

5. A Patron or Employee shall be entitled to withdraw their consent to the collection, use or disclosure of Patron Information or Employee Personal Information at any time by giving reasonable notice to the Society of such withdrawal of consent. On receipt of such notice the Society shall inform the Patron or Employee of the likely consequences of the withdrawal of the Patron's or Employee's consent however the Society shall not prohibit a Patron or Employee from withdrawing their consent.

6. Whenever a Patron withdraws their consent to the collection, use or disclosure of Patron Information, the Society shall stop collecting, using or disclosing that information; provided that, a Patron may not withdraw consent if withdrawing the consent would frustrate the performance of a legal or contractual obligation, or a pre-existing necessary business purpose for which information was initially collected..

7. Subject to this Policy, The Society shall not, without the express permission of the Patron or Employee, collect Patron Information on behalf of another organization or provide such information to any other organization at any time. The definition of "another organization" is defined as an external third-party not an organization deemed to be part of a business relationship between the SWTS, that organization, and the patron, such as is described in definition D above.

8. The Society shall, on the written request of a Patron provide the Patron with the following:
 - a. the Patron Information which is under the control of the Society; and
 - b. information about the ways in which the information has been and is being used by the Society.

9. The Society shall, on request of a Patron correct an error or omission in the Patron Information under the control of the Society.

10. This Privacy Protocol shall be made reasonably available to patrons using such communication means as best serve the type of business interaction between the patron and the SWTS.

11. Employee information is collected at the start of employment and is retained for a reasonable period of time upon cessation of employment. Such employee information is collected as is needed for operational and training purposes by the SWTS. At the start of employment, employees are informed of the information being collected. While employees do have opportunity to give consent to the collection of employee information; the refusal to provide certain information (eg. Criminal Record Check) will affect employment opportunities with the SWTS. Employees may have reasonable opportunity to view this information, provided that steps are taken to protect the confidentiality of other employees or patrons. Employee information is stored securely and is shredded securely when no longer needed for operational purposes.

12. The SWTS Communications policy and practices shall conform to this Privacy Protocol.