



## **Saskatchewan Chamber of Commerce Privacy Policy**

**Last updated February 2021.**

### Introduction

The Saskatchewan Chamber of Commerce has implemented this Privacy Policy so that you understand how we collect, use, disclose and protect your personal information, and how you can access, update, and otherwise manage this personal information. We are committed to protecting the privacy of our members, partners, users, and visitors. This Privacy Policy applies to your use of our website, <http://www.saskchamber.com> and our services, including those we may provide in relation to the software platform, Vision Critical™, and our InputSask insights community (collectively, the “**Services**”). From time to time, we may offer services through external merchants. If you chose to use these services, please refer directly to the privacy policies of these merchants.

We reserve the right to change our Privacy Policy from time to time by posting the changes on our website at [www.saskchamber.com](http://www.saskchamber.com). When we make a change to our Privacy Policy, we will update the “last updated” date at the top of this Privacy Policy. If we make any changes to this Privacy Policy that materially affect your rights, we will provide you with notice by prominently posting it on our website and in email. Changes to our Privacy Policy are effective when they are posted here. Your use of our website or Services after we have made changes to our Privacy Policy and we have notified you, where required constitutes your acceptance of the changes.

By using our website or Services, you accept the terms of this Privacy Policy. If you do not agree to the terms of this Privacy Policy, you may not use our website or Services.

### Accountability

The Saskatchewan Chamber of Commerce (the “**Saskatchewan Chamber**”) is accountable for all personal information under its control.

Any questions about the Saskatchewan Chamber’s handling of personal information should be directed to our Privacy Officer:

[info@saskchamber.com](mailto:info@saskchamber.com)

(P) 306.352.2671

200-2221 Cornwall Street

Regina, SK S4P 2L1

### **Attention: Privacy Officer**

Personal information is information about an identifiable individual. Personal information does not include information that cannot be attributed to an identifiable individual, e.g., information of an aggregate or anonymous nature, which is considered non-personal or anonymized information.

The Saskatchewan Chamber does not collect, use, or disclose personal information for any other purpose than identified at or before the time of collection, unless otherwise authorized in accordance with applicable legislation.

### Member Services

The Saskatchewan Chamber may collect contact information from its members or others to:

- send out newsletters and other relevant information.
- inform members of upcoming Saskatchewan Chamber events; and
- send out invoices and otherwise administer Saskatchewan Chamber memberships.

This contact information is voluntarily provided to the Saskatchewan Chamber. Requests may be made at any time to be removed from the Saskatchewan Chamber mailing lists.

Through external merchants, the Saskatchewan Chamber offers various services to its members including programs such as: Chambers of Commerce Group Insurance Plan. Members who choose to participate in programs should refer directly to the privacy policies of the sponsoring companies. The Saskatchewan Chamber does not collect, use, or retain any personal information from these programs.

### Consent

We only collect, use, disclose, and store your personal information after obtaining your consent, except where otherwise required or permitted by law. We will obtain your express consent prior to or when collecting, using, or disclosing your personal information for any purpose not described in this Privacy Policy, or for a purpose that was not identified to you nor reasonably expected at the time of collection, unless we are required or permitted by law not to obtain your consent.

Generally, we must obtain express consent when the personal information being collected, used, or disclosed is sensitive (e.g., financial information, such as a credit card number), when the collection, use or disclosure is outside of your reasonable expectations, and/or when the collection, use or disclosure creates a meaningful residual risk of significant harm to you.



If information is voluntarily provided, this constitutes consent to the collection, use and disclosure of personally identifiable information only for a purpose that would be considered obvious. In most cases, the Saskatchewan Chamber will seek consent to collection, use and disclosure. The Saskatchewan Chamber will not use personal information for any purpose other than that for which consent has been provided except where otherwise required or permitted by law. Should the Saskatchewan Chamber require use of personal information for a new purpose, consent will be sought for that new use.

We limit the collection, use, and disclosure of your personal information to only that which is necessary for the purposes identified, unless you have otherwise consented, or when such collection, use, and/or disclosure is required or permitted by law.

You may refuse to provide your personal information. However, your refusal to provide personal information may prevent you from using our website or Services.

### Collection

The Saskatchewan Chamber does not collect, use, or disclose personal information of individuals except when individuals give consent, provide the information on a voluntary basis, or as required or authorized by law.

We need to collect certain information from you to provide you with our website or Services. We collect personal information and non-personal information from you when you provide it to us or when you use or interact with our website or Services.

There may be occasions where more specific personal information is necessary for us to proceed with a request for information or provide you with a product or service. In such cases, we will provide you with a description of the information we need. In all cases, the Saskatchewan Chamber limits the amount and type of information collected to only the personal information that is required to provide the individual with the requested information, product, or service. We collect only information that is voluntarily provided by you and undertake that such information will be kept strictly confidential.

You may provide us with personal information and non-personal in several ways, including for example when you visit our website or use our Services, when you create an account on our InputSask insights community, or when otherwise using our Services, including when you correspond or interact with us in any way, online or offline.

The Saskatchewan Chamber may disclose personal information collected by it without the knowledge or consent of the individual, in certain circumstances prescribed by law, for example



to its lawyers; for purposes relating to an investigation or proceeding, or where required by law to disclose the information. The Saskatchewan Chamber will not use or disclose personal information without the consent of the individual except as authorized by applicable law.

The Saskatchewan Chamber does not sell or trade any personal information with third parties. The Saskatchewan Chamber may transfer information to service providers where information processing is outsourced by the Saskatchewan Chamber during its administrative procedures or member services in specific cases. Where personal information is transferred to a service provider for processing, we require the service provider to respect this Privacy Policy and we restrict them from using or disclosing personal information transferred to them for any purpose other than the provision of services to us.

Any personal information that the Saskatchewan Chamber retains is maintained to always ensure its security and confidentiality.

#### Cookies & Analytics

Our Services may use cookies and/or similar technologies such as beacons, tags, and scripts. Cookies are small text files that are stored on your device by the browser. Some cookies remain stored on your device until you delete them. Cookies make it easier for us to recognize your browser when you next visit us. If this is against your preference, you can set your browser so that it informs you when cookies are set and only allows this in certain cases. Deactivating cookies may limit the functionality of our Services.

Our website may also use internet analysis services such as Google Analytics and/or Hotjar. These services use cookies or other tracking technologies to help us analyze how users interact with and use our website, compile reports on the related activities, and provide other services related to website activity and usage. The technologies used by these services may collect information such as your IP address, time of visit, whether you are a return visitor, and any referring website or app.

The information generated by these services will be transmitted to and stored by the relevant service. To learn how to opt out of tracking of analytics by Google, please visit: <https://tools.google.com/dlpage/gaoptout>. To learn how to opt out of tracking of analytics by Hotjar, please visit: <https://www.hotjar.com/legal/policies/do-not-track/>.

#### Social Media and Other Links

Our website may, from time to time, contain links to and from social media platforms or other websites. You may choose to connect to us through a social media platform, such as Twitter,



and when you do, we may collect additional information from you (including personal information), such as your screen name, through the social media platform.

Social media platforms and other websites may also collect information from you. We do not have control over (nor do we assume responsibility for) the collection, use, and/or disclosure practices of social media platforms or other websites. Please review privacy policies and practices of these social media platforms, including data security practices, before using these social media platforms or other websites.

### Use

We only use your personal information to fulfill the purposes for which it was collected in accordance with this Privacy Policy, unless otherwise consented to by you in advance, or as may be required or permitted by law.

We use personal information to provide you with our website and Services including without limitation to administer membership and provide member services to you, register you for events, and allow you to purchase various products or services. We also use personal information to maintain and improve our website and Services, including managing your account on our InputSask insights community, communicate with you with respect to updates or other information related to the Services, respond to your requests and communications, respond to legally binding demands from law enforcement, regulatory authorities or other third parties, and to comply with applicable law.

We may use non-personal information for any legitimate business purpose, including the provision of our website and/or Services.

### Accuracy of the Information on this Website

The information on this website is believed to be accurate, complete, and current when posted, but the Saskatchewan Chamber does not guarantee that it will remain accurate or complete or that it will be always current.

The Saskatchewan Chamber is not responsible for direct, indirect, special, or consequential damages, regardless of the cause, arising out the use of this website.

### Accuracy of Information on Linked Websites

Through the links to other sites found on the Saskatchewan Chamber's website, the user may enter domains that are beyond the control of the Saskatchewan Chamber and, once there, the

Saskatchewan Chamber is not responsible for the privacy practices or the content of these websites. The Saskatchewan Chamber has no control over the accuracy, completeness, or relevance of the information on these sites and provides links to these sites solely for the information and convenience of visitors to our website.

### Copying Information from this Website

The information on the Saskatchewan Chamber website may be used or copied if it is used or copied accurately or is used in its entirety and so that the source of the information is clearly identified. The Saskatchewan Chamber is not responsible for the way in which the information may be used or copied. The Saskatchewan Chamber reserves the right to change, delete or add information at any time.

### Disclosure

Except as set forth in this Privacy Policy, or as required or permitted by law, we do not disclose your personal information to any parties other than our service providers and our affiliates, and their respective directors, officers, employees, agents, consultants, advisors or other representatives, that have a need to use your personal information to provide or improve our website or Services, and to legal or regulatory authorities, or for other purposes for which you have provided your consent. By using our website or Services, you consent to such disclosure.

We do not sell, barter, or lease your personal information. When we disclose your personal information to a third party, we will enter into an agreement with such third party to protect the confidentiality of your personal information and to ensure your personal information is only used to provide the website and/or Services or otherwise help us with the uses described in this Privacy Policy.

The following are circumstances in which we may disclose your personal information without obtaining your specific consent:

- a. to any third-party service providers to help us with the uses described in this Privacy Policy.
- b. to third parties where we are under a duty to disclose your personal information to comply with any applicable legal obligation, including if disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records.
- c. if the disclosure is made to another organization and is reasonable for the purposes of investigating a breach of an agreement or a contravention of the laws of Canada or a province that has been, is being or is about to be committed and it is reasonable to expect that disclosure with the knowledge or consent of the individual would compromise the investigation.

- d. if the disclosure is made to another organization and is reasonable for the purposes of detecting or suppressing fraud or of preventing fraud that is likely to be committed and it is reasonable to expect that the disclosure with the knowledge or consent of the individual would compromise the ability to prevent, detect or suppress the fraud.

We disclose non-personal information to third parties as reasonably necessary to meet our business needs.

When you disclose personal information or otherwise publicly interact with other users on the website or the Services (e.g., on our InputSask insights community), such personal information may be viewed by all users. We are not responsible for any use that these users may make of the personal information you disclose.

### Retention and Security

We will only retain your personal information for as long as is reasonably required to fulfill the purposes for which it was collected, including compliance with legal requirements. We may retain non-personal information for as long as we have a business need to do so.

We have taken appropriate measures to ensure the security and confidentiality of your personal information. For example, we have secure locks on our filing cabinets, and we restrict access to our records and equipment, including computers. We also use firewalls and encryption.

We undertake all reasonable measures to safeguard personal information once we receive it, but no transmission of data over the internet or any other public network is guaranteed by us to be completely secure. If you suspect an unauthorized use or security breach that compromises the security of your personal information, please contact our Privacy Officer as soon as possible.

Once we receive your personal information, it may be transferred to and maintained on or in computing systems or clouds located outside of your province or country (in Canada and/or the United States only), where the data protection laws may differ than those from your jurisdiction. Your consent to this Privacy Policy followed by your disclosure of your personal information represents your agreement to such transfer and maintenance.

All of our service providers and contractors are contractually obligated to employ appropriate data security measures with respect to your personal information and to collect/use/disclose/retain it only within the scope required for the provision of our website or Services. The contractors we enter into agreements with will use your personal information if required to perform their respective services in support of our provision of the website or Services to you.



## Access and Updates

On your reasonable written request, we will provide you, not later than thirty (30) days from our receipt of your request, or such additional time as required by law, with access to or information about your personal information (if any) under our custody or control, and the names of persons to whom, and any circumstances in which, your personal information has been and/or is being disclosed by us. You must provide sufficient information in your request to allow us to verify your identity and identify the personal information you are seeking. Your request should include your name, contact details, membership number (where applicable), and the specifics of your request.

If you request a copy of your personal information and the personal information can reasonably be reproduced, we will provide you with a copy of the personal information, or, if applicable, we will give you reasons for any delay in providing a copy of the requested personal information. All requests may be subject to minimal costs, in accordance with applicable privacy legislation.

We reserve all rights not to disclose personal information to you in response to your request, in whole or in part, in certain circumstances required or permitted by law, including but not limited to where the personal information is protected by any legal privilege, the disclosure of the personal information would reveal our confidential commercial information or that of our third party service providers, the disclosure could reasonably be expected to threaten the safety or physical or mental health of an individual, or the personal information was collected by us for an investigation relating to a breach of an agreement or a contravention of the laws of Canada or a province thereof.

If access to your personal information is refused, in whole or in part, we will provide you with the reasons for our refusal, the provision of applicable privacy legislation on which the refusal is based, and the contact information of the Privacy Officer who can answer your questions about the refusal. We will also inform you that you may ask for a review of our refusal in accordance with applicable privacy legislation.

To submit a request to access your personal information or designate an authorized agent to make a request to access your personal information, please contact our Privacy Officer.

We make every reasonable effort to keep personal information as accurate, complete, current, and relevant as necessary for the identified purposes, however, we do not routinely update personal information. Please contact our Privacy Officer if you would like to request an update to your personal information. If you so request, we will make every reasonable effort to correct any of your outdated personal information, or errors or omissions in your personal information,





provided that such personal information is in our custody or control. Your request must be in writing, signed by you, and include sufficient detail to enable us to identify any personal information in our custody or control in relation to your request, including your name, contact details, membership number (where applicable), and the specifics of your request.

As soon as reasonably practical (but not later than thirty (30) days from our receipt of your request or within such additional time as required or permitted by law), we will either correct your personal information and, if applicable and reasonable to do so, send correction notifications to any third party to whom we disclosed the incorrect personal information, or we will decide not to correct the personal information. If we do not correct the personal information, we will annotate the personal information under our control to indicate that a correction was requested but not made.

We will inform you of the action that we have taken in response to your request for correction, that our Privacy Officer can answer your questions about your request for correction, and that you may ask for a review of the action taken in accordance with applicable privacy legislation.