

Privacy Policy

Our Commitment to Privacy

Protecting the privacy and confidentiality of personal information is an important aspect of the way El Sistema Grey Bruce – The Big Sound (also referred to as The Big Sound and/or TBS) conducts its business. Collecting, using, and disclosing personal information in an appropriate, responsible, and ethical manner is fundamental to the organization's daily operations.

The Big Sound strives to protect and respect personal information of its program participants (children and youth), volunteers, staff, donors, funders, community partners and so on in accordance with all applicable regional and federal laws. Each volunteer and staff member must abide by this organization's procedures and practices when handling personal information.

Applicability

This Privacy Policy informs everyone of TBS's commitment to privacy and establishes the methods by which privacy is ensured. This Policy applies to all personal information within TBS's possession and control.

Personal information is defined as any identifying information about an individual or group of individuals, including name, date of birth, address, phone number, e-mail address, social insurance number, nationality, gender, health history, financial data, credit card numbers, bank account numbers, assets, debts, liabilities, payment records, credit records, loan records, opinions, and personal views.

Business information is defined as business name, business address, business telephone number, name(s) of donor(s), executive officer(s), and director(s), job titles, business/charitable registration numbers, and financial status. Business information is treated and handled with the same level of confidentiality, privacy, and respect as personal information.

Consent occurs and is obtained when an individual signs an application or other form containing personal information, thereby authorising TBS to collect, use, and disclose the individual's personal information for the purposes stated on the form or in the Appropriate Use section of this Policy.

- Implied consent is granted by the individual when he/she signs an application/registration form. This allows TBS to obtain or verify information from third parties (such as professional/personal references provided by program personnel) in the process of assessing the eligibility/appropriateness of an individual for the program.

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Appropriate Use

TBS collects and uses personal information solely for the purpose of running it's not for profit, charitable organization. TBS hereby asserts that personal information will only be used for the following purposes:

1. Personal information collected on the program's participants (children and youth)
2. Personal information collected on the organization's staff and volunteers
3. Information collected on the organization's financial supporters (i.e. donors and funders)

Policy Statements

1. TBS assumes full accountability for the personal information within its possession and control. This organization has appointed the Secretary/Treasurer of the Board of Directors as custodian of all privacy matters and legal compliance with privacy laws.
2. TBS obtains personal information directly from the individual to which the information belongs. Individuals are entitled to know how TBS uses personal information and this organization will limit the use of any personal information collected only to what is needed for those stated purposes. TBS will obtain individual consent if personal information is to be used for any other purpose and will not use that information without the consent of the individual.
3. Under no circumstances will TBS sell, distribute, or otherwise disclose personal information or contact lists to third parties. However, limited disclosure may be required as part of TBS fulfilling its stated Mission, business duties and day-to-day operations (i.e. required reports to supporting Foundations), but only with the understanding that these parties obey and abide by this Privacy Policy, to the extent necessary of fulfilling their own business duties and day-to-day operations.
4. TBS will retain personal information only for the duration it is needed. Once personal information is no longer required, it will be destroyed in a safe and secure manner. However, certain laws may require that certain personal information be kept for a specified amount of time. Where this is the case, the law will supersede this Policy.
5. TBS vows to protect personal information with the appropriate security measures, physical safeguards, and electronic precautions. TBS maintains personal information through a combination of paper and electronic files. Where required by law or disaster recovery/business continuity policies, older records may be stored in a secure, offsite location.
 - o Access to personal information will be authorized only for volunteers, employees, and/or other agents of TBS who require the information to perform their job duties, and to those otherwise authorized by law.

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- TBS's digital records are secured by complex passwords. Only authorized individuals may access these secure records.
 - Active files are kept in locked filing cabinets.
 - Routers and servers connected to the Internet are protected by a firewall, and are further protected by virus attacks or "snooping" by sufficient software solutions.
 - Personal information is not transferred to volunteers, student instructors/mentors, interns, or other non-paid staff by e-mail or any other electronic format.
6. TBS's Website will include our Privacy Policy and disclose our personal information practices. Individuals inputting data into the Website will be notified of:
- Personally identifiable information about the individual that is collected from the Website or through affiliate sites.
 - Information about the organization collecting the data.
 - How the data will be used.
 - With whom the data may or may not be disclosed.
 - What options are available to the individual regarding the collection, use, and disclosure of personal information?
 - The information technology security procedures in place that protect against the destruction, loss, theft, alteration, or misuse of personal information under TBS's possession and control.
 - How the individual may access and correct any inaccuracies in their personal information.
 - TBS may share compiled demographic information with its donors/funders and/or advertisers, but no personal information that can identify any individual person shall be disclosed.
 - This Website may contain links to other sites, but TBS is not responsible for the privacy practices of other organizations' sites.
 - While IP addresses will be logged in order to administer the site, track visitor movement, and gather demographic information, these IP addresses will not be linked to any personally identifiable information.
 - Any registration information collected from program participant families (either personal and/or financial) will be strictly protected.
7. In most instances, TBS will grant individuals access to their personal information upon presentation of a written request and satisfactory identification. If an individual finds errors of

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fact with his/her personal information, please notify the Board's Secretary/Treasurer as soon as possible to make the appropriate corrections. Should TBS deny an individual's request for access to his/her personal information, TBS will advise, in writing, the reason for such a refusal. The individual may then challenge the decision.

8. TBS may use personal information without the individual's consent under particular circumstances. These situations include, but are not limited to:
 - TBS is under obligation by law to disclose personal information in order to adhere to the requirements of an investigation of the contravention of provincial or federal legislation, under the purview of the appropriate authorities.
 - An emergency exists that threatens an individual's life, health, or personal security.
 - The personal information is for in-house statistical study or research.
 - The personal information is already publicly available.
 - Disclosure is required to investigate a breach of contract.

Conclusion

Any questions or concerns regarding this Privacy Policy can be addressed by contacting any member of the Board of Directors. TBS will investigate and respond to concerns about any aspect of the handling of personal information. This organization will address concerns to the best of its abilities.