

This version is effective as of November 28, 2019.

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1. Overview

At the Penticton and Wine Company Chamber of Commerce (the “Chamber”), we pride ourselves on our commitment to protecting your privacy. Our data governance and privacy policies reflect our Chamber's values and how we strive to maintain your privacy.

This Privacy Policy (the "Policy") discloses the privacy practices of the Chamber (referred to as "we," "us," "our"). This Policy governs how we use and protect personal information that we collect when you visit our website, use our services, or otherwise engage with us.

Any use you make of Chamber services is subject to the Chamber's Terms of Service (TOS).

The Chamber is governed by the Canada *Boards of Trade Act – Part I*, and has a registered office at 102 Ellis Street, Penticton, BC V2A 4L3.

The Canada *Personal Information Protection and Electronic Documents Act* (PIPEDA) is the federal privacy law for private-sector organizations. It sets out the ground rules for how federally-regulated organizations, including the Chamber, must handle personal information in the course of their commercial activity.

2. Contact Us

If you have any questions about this Policy or questions or complaints about our privacy practices, please contact us using the details below:

The Penticton and Wine Country Chamber of Commerce, 102 Ellis Street, Penticton, BC V2A 4L3.

email: director@penticton.org

The contact information above should also be used for communications relating to exercising the rights described in section 9 below.

3. Information We Collect

We gather information from you when you:

1. become a member of the Chamber;
2. purchase products or services from us;
3. subscribe to our newsletters and mailing lists;
4. participate in promotions, competitions or prize drawings;
5. fill in forms, conduct searches, post content on the website, respond to surveys, or use any other features of our websites;
6. make an inquiry, provide feedback, submit correspondence, or make a complaint over the phone, by email, on our website or by post;
7. register to, present at, or attend our events;
8. enter into a contract with us;
9. contact other users on the Chamber website;
10. 'follow', 'like', post to, or interact with, our social media accounts, including Facebook, LinkedIn, Twitter, Pinterest, Instagram, Google+, and SnapChat; and
11. contribute content and information about yourself in the course of your use of social and sharing features in our websites, services or products that make users' content and information available to the public or to specific groups, such as others who use those features.

The information you provide to us may include (depending on the circumstances):

1. Identity and contact data: title, names, addresses, email addresses, phone numbers or your signature.
2. Account profile data: a user name name, password, user preferences and, if you sign up through a social media account, certain information about that account.
3. Event registration details: the organization you work for, job title, language preferences, your name, your email, your age, your gender, your job function, your experience, your opinions and why you are attending the conference and what you hope to learn, your accessibility needs.
4. Financial data: payment details, which may include billing addresses, credit/debit card details and bank account details.
5. Visual and audio information about yourself: e.g. a photo or video footage, or sound recording.

6. Your preferences: information about your preferences, interests, industry focus, community choices, and other customer profile information.
7. Any other information that you choose to share with us: for example, any information that you provide via correspondence, when you fill out our surveys, that you share via our website or social media accounts linked to our website, or any information that you choose to provide in person at events, meetings, or over the phone.

In certain circumstances, we will receive information about you from other sources, including third parties. For example, we may receive personal information from any of the following:

1. Other website users;
2. Event attendees;
3. Your agents or representatives who are acting on your instructions;
4. Commercial contact lists that we acquire from other organizations;
5. Organizations with whom we provide co-branded events, websites, products, and services;
6. Service providers including our website developers, IT support providers, cloud services providers, payment services providers, billing service providers, contractors, consultants, advertising agencies and platforms, digital performance monitoring and management providers, advertising analytics providers, marketing and sales service providers, user experience testing platforms, B2B contact databases, recruitment agencies, survey tool providers, customer relationship and customer support service providers, event ticket retailers, event management platform service providers, customer identity account management providers, HR service providers, couriers, instant messaging service providers;
7. Publicly available sources such as LinkedIn, Facebook, Twitter, and Google+.

We might also receive information about you from other third parties if you have indicated to such third parties that you would like to hear from us.

Some of our online products and services may collect information about system and product data. We use this information to manage and administer our products and services, to issue updates and new versions, testing and monitoring services that we provide, enhancing our products and services, and improving and targeting our communications with you.

Technologies such as cookies, beacons, tags, local storage, and scripts are used by us and our affiliates, and other companies, such as third party technology service providers and web analytics providers. These technologies make it easier for you to navigate our website and to help us manage the content on our website and are used to analyze trends, administer the sites, track users' movements around the site (including which site you clicked from to arrive at our site), and gather demographic information about our user base.

4. How We Use Information We Collect

We use your information for the following purposes:

1. to register and maintain your Chamber membership;
2. to provide access to our website in a manner convenient and optimal and with personalized content relevant to you;
3. to process and fulfill your orders for Chamber products and services;
4. to process and facilitate transactions and payments, and recover money owed to us;
5. to monitor your account and use of services to ensure compliance with our end-user agreements and prevent and identify unlawful content use and violations;
6. to enable you to communicate with other Chamber members and website users;
7. to manage our relationship with you, which will include notifying you about changes to our terms of service or privacy policy, and asking you to leave a review or take a survey;
8. to enable and support your participation and sharing in connection with those social features of our websites, products, services, and online communities in which you choose to participate;
9. to conduct business with you or your employer, including to contact you and manage and facilitate our business relationship with you and your employer;
10. to provide customer service and support, like dealing with inquiries or complaints about the website, which may include sharing your information with our website developer, IT support provider, and payment services provider as necessary;
11. to enable you to take part in prize drawings, competitions, and surveys;
12. to work with you and undertake projects with you, including to process any proposals that you submit to us;
13. to carry out marketing and let you know about our news, events, products or services that we believe may interest you;
14. to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you;
15. to interact with users on social media platforms;
16. to conduct data analytics to improve our website, products/services, marketing, customer relationships and experiences;
17. to make suggestions and recommendations by sharing your information with selected third parties such as sponsors and partners, so they can contact you about things that may interest you;
18. to carry out marketing research and user testing to assess the levels of satisfaction of existing and proposed products and services;

19. to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity; and
20. to enable us to comply with our policies and procedures and enforce our legal rights, and to protect the rights, property or safety of our employees and share your information with our technical and legal advisors.

We will use your information for the purposes listed above either on the basis of:

1. your consent (where we request it);
2. performance of your contract with us and the provision of our services to you;
3. where we need to comply with a legal or regulatory obligation; or
4. our legitimate interests or those of a third party (see section 5 below for more information).

5. Legitimate Interests

As outlined above, in certain circumstances we may use your personal information to pursue legitimate interests of our own or those of third parties. Where we refer to our "legitimate interests", we mean our legitimate business interests in conducting and managing our business and our relationship with you, including the legitimate interests we have specified in section 4 above.

Where we use your information for our legitimate interests, we make sure that we take into account any potential impact that such use may have on you. Our legitimate interests don't automatically override yours and we won't use your information if we believe your interests should override ours unless we have other grounds to do so (such as your consent or a legal obligation). If you have any concerns about our processing please refer to details of "Your Rights" in Section 9 below.

6. How We Share And Disclose Personal Information

We consider your personal information to be a vital part of our relationship with you and do not sell your personal information to third parties. There are, however, certain circumstances in which we may share your personal information with certain third parties, as follows:

1. other website users and clients who use our websites and/or applications to communicate or otherwise interact with you;
2. sponsors, partners and collaborators, including sponsors of our events, products or services, and organizations with whom we host co-branded events.
3. our service providers who are acting as processors and who assist us with our administrative or business functions, or in the provision of any of our products/services to you.
4. marketing parties which are any selected third party that you consent to our sharing your information with for marketing purposes.
5. other third parties including legal, professional or other advisors, regulatory authorities, courts, law enforcement agencies and government agencies) where necessary to enable us to enforce our legal

rights, or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law.

7. How We Look After Your Personal Information

We use administrative, technical, and physical safeguards to protect the security, confidentiality, and integrity of personal data against loss, misuse and unauthorized access, disclosure, alteration, and destruction. We also operate a policy of “privacy by design” by looking for opportunities to minimize the amount of personal information we hold about you.

The safeguards we use include:

1. ensuring the physical security of our office;
2. ensuring the physical and digital security of our equipment and devices by using appropriate password protection and encryption;
3. using standard security protocols and mechanisms (such as secure socket layer (SSL) encryption) to transmit sensitive data such as credit card details;
4. maintaining a data protection policy for, and delivering data protection training to, our employees;
5. limiting access to your personal information to those who need to use it in the course of their work.

If you have any questions about the security of your personal information, please contact us using the methods outlined in the "Contact Us" section above.

8. How Long We Keep Your Personal Information

We will keep your information for as long as is necessary to provide you with the services that you have requested from us or for as long as we reasonably require to retain the information for our lawful business purposes, such as for the purposes of exercising our legal rights or where we are permitted to do. We operate a data retention policy and look to find ways to reduce the amount of information we hold about you and the length of time that we need to keep it.

Please contact us using the methods outlined in the “Contact Us” section above if you would like to obtain details of our retention periods for different aspects of your personal data.

9. Your Rights: Access And Accuracy, Updating, Correcting, Or Deleting Information

You have certain rights in respect of the information that we hold about you, including:

1. the right to be informed of the ways in which we use your information, as we seek to do in this Privacy Policy;
2. the right to ask us not to process your personal data for marketing purposes;

3. the right to request access to the information that we hold about you;
4. the right to request that we correct or rectify any information that we hold about you which is out of date or incorrect;
5. the right to withdraw your consent for our use of your information in reliance of your consent, which you can do by contacting us using any of the details at the top of this Privacy Policy;
6. the right to object to our using your information on the basis of our legitimate interests;
7. the right to receive a copy of any information we hold about you; and
8. in certain circumstances, the right to ask us to erase information we hold about you.

You may exercise your rights above by contacting us using the methods outlined in the “Contact Us” section above and we will comply with your requests unless we have a lawful reason not to do so.

You may also opt-out of receiving newsletters or other communications by following the opt-out instructions included in each newsletter or communication or by contacting us using the methods outlined in the “Contact Us” section above.

10. What We Need From You To Process Your Requests

We may need to request specific information from you to help us confirm your identity and to enable you to exercise your rights. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

You will not have to pay a fee to exercise the rights set out above. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. Sharing Data With Third Parties

You might provide personal information directly to third parties as a consequence of your interactions with our website and other services offered by us. For example, our website may contain content and links to other third-party websites, plug-ins, and applications that are operated by third parties that may also operate cookies. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We don't control these third party websites or cookies, we are not responsible for their privacy statements, and this Privacy Policy does not apply to them. Please check the terms and conditions and privacy policy of the relevant third party website to find out how they collect and use your information. If you do not want us to share your personal information with these companies, contact us using one of the methods described in the “Contact Us” section above.

Please be responsible with personal information of others when using our website and the services available on it. We are not responsible for your misuse of personal information, or for the direct relationship between you and others that takes place outside of the website or our services.

12. Changes To This Privacy Policy

Please note that this Policy may change from time to time. We will not reduce your rights under this Policy without your consent. If we make any material changes we will notify you by email or by means of a notice on this website prior to the change becoming effective. You can also view prior versions of the Policy by viewing the links in section 11 below.