

# Privacy Policy

Updated December 14, 2021

WinterFrolicD’hiver is committed to protecting the privacy of any personal information you may provide when visiting our Website. Part of that commitment is to explain what information may be collected and why, how it will be used and who may have access to it. Our practices have been designed to ensure compliance with information protection provisions of applicable laws.

This privacy statement applies to interactions with the WinterFrolicD’hiver Web server. It does not apply to any other Website. Following is an overview of our Website practices.

## Personal information

When you visit the WinterFrolicD’hiver’s Website, you do so anonymously - there is no need to tell us who you are. If you direct an enquiry, we will ask you to provide your name and mailing address or e-mail address for the purpose of responding to your enquiry. Only those who "need to know" will have access to the personal information provided.

The WinterFrolicD’hiver’s Web server does not collect or retain your e-mail address in a database format although some Internet Service Providers may automatically include your e-mail address with your IP address (Internet Protocol).

## COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

WinterFrolicD’hiver collects different types of personal information, personal employee information and personal volunteer information in respect of the board members, employees, volunteers and other individuals with whom the organization interacts.

WinterFrolicD'hiver will obtain consent for the collection of personal information where necessary and may collect personal information without knowledge or consent where permitted to or required by applicable laws or regulatory requirements.

The personal information and/or Personal Employee Information and/or Personal Volunteer Information that is collected, depending on the nature of an individual's relationship with the WinterFrolicD'hiver, may include, but is not limited to:

1. Contact and identification information, such as an individual's name, address, telephone number and e-mail address;
2. Identification information;
3. Resumes and/or applications;
4. References and interview notes;
5. Photographs and videos;
6. Volunteer information sheets;
7. Offer letters and employment contracts;
8. Payroll information forms, including, social insurance number and pay cheque deposit information;
9. Wage and benefit information;
10. Uniform and safety equipment information forms;
11. Parking authorization information forms;
12. Expense reimbursement forms;
13. Medical services department forms, including information related to the medical services that are sought or obtained from the Medical Services department;
14. Forms relating to the application for, or changes to, employee health and welfare benefits, including short and long term disability, life insurance, optional life insurance, accidental death and dismemberment, medical and dental care;
15. Beneficiary and emergency contact information;

16. Product and service related information concerning the products and services that the organization provides to, or receives from an individual;
17. Financial information, such as payment methods (credit card or debit card information), credit history (where an individual wishes to obtain credit from the WinterFrolicD’hiver) and/or direct deposit or banking information (so that the organization can pay for the products and services obtained from an individual); and,
18. Relationship information, including information related to agreements, preferences, advisors and decision-makers, feedback and information requested by or provided to an individual.

WinterFrolicD’hiver values the opinions and suggestions of the individuals with whom the organization interacts. WinterFrolicD’hiver may collect market-related information, which may include personal information, concerning market trends and activities impacting WinterFrolicD’hiver Frolic businesses and operations.

WinterFrolicD’hiver may also collect information, which may include personal information, related to media and public relations activities and information related to interactions with board members, employees, volunteers, program participants, WinterFrolicD’hiver guests, WinterFrolicD’hiver neighbours and members of the community.

From time to time, the WinterFrolicD’hiver may work with, or utilize the services of, third parties. The WinterFrolicD’hiver may also receive personal information collected by those third parties in the course of the relationship with, or the performance of their services or otherwise. Where this is the case, the WinterFrolicD’hiver will take reasonable steps to ensure that these third parties have obtained the necessary consent to collect, use and disclose personal information to the WinterFrolicD’hiver and that the WinterFrolicD’hiver has taken the

necessary steps to obtain the consent of the individual to the collection of personal information from a third party where the organization is required to do so.

The WinterFrolicD’hiver uses personal information and/or Personal Employee Information and/or Personal Volunteer Information for business purposes, including for the purpose of establishing, managing or terminating employment or volunteer relationships with the WinterFrolicD’hiver, and to enable the WinterFrolicD’hiver to manage, maintain and develop the organization’s business and operations.

The WinterFrolicD’hiver will obtain consent for the use of personal information where necessary and may use personal information without knowledge or consent where permitted to or required by applicable laws or regulatory requirements.

**Personal information may be used to:**

1. Determine eligibility for initial employment or volunteer functions, including the verification of references and qualifications;
2. Administer pay and benefits;
3. Process work-related claims;
4. Establish training and/or development requirements;
5. Conduct performance reviews and determine performance requirements;
6. Assess qualifications for a particular job or task;
7. Consider promotions or changes in jobs;
8. Recognize outstanding service to the WinterFrolicD’hiver;
9. Establish a contact point in the event of an emergency;
10. Comply with applicable labour or employment statutes;
11. Compile directories and telephone lists;

12. Provide the medical services that are sought or obtained from the Medical Services department;
13. Provide uniforms and safety equipment;
14. Administer parking privileges;
15. Process expense reimbursement requests;
16. Advise of opportunities for employment or volunteer assistance;
17. Share information about the WinterFrolicD'hiver, including the organizations committees, events, activities and meetings;
18. Advise of fundraising campaigns, goals and opportunities to donate;
19. Ensure the security of the WinterFrolicD'hiver's information;
20. Establish, maintain and manage the Frolic's relationship with individuals so that the organization may provide, or receive, the products and services that have been requested;
21. Review the products and services that the Frolic provides to individuals so that the organization may understand individual requirements for the organizations products and services and so that the organization may work to improve its products and services;
22. Review the products and services that the WinterFrolicD'hiver obtains from individuals so that the organization may understand requirements for such products and services;
23. Inform individuals of the Frolic's products and services;
24. Inform individuals of products and services that third parties partners may wish to offer individuals;
25. Comply with individuals' requests;
26. Protect the WinterFrolicD'hiver against error, fraud, theft and damage to WinterFrolicD'hiver goods and property;

27. Enable the organization to undertake environmental, and health and safety activities, including incident planning, response and investigation;
28. Enable the organization to comply with applicable laws or regulatory requirements; and,
29. Such other purposes as are reasonably required by the WinterFrolicD’hiver.

Personal information may also be used in the course of an individual’s participation in some or all of the programs that the WinterFrolicD’hiver may offer from time to time through various program partners, including parking privileges, WinterFrolicD’hiver passes, discount programs and event invitations.

The WinterFrolicD’hiver will not sell, rent or give away personal information to third parties for the purpose of allowing others to market their products or services to an individual.

The WinterFrolicD’hiver may use personal information collected to respond to:

1. Market trends and activities impacting businesses and operations;
2. Media and public relations activities; and,
3. Interactions with WinterFrolicD’hiver employees, volunteers, program participants, WinterFrolicD’hiver guests, WinterFrolicD’hiver neighbours and members of the community.

This enables the WinterFrolicD’hiver to respond to trends and needs to better understand and operate businesses and operations and to plan for the future.

The WinterFrolicD’hiver may disclose personal information to employees, volunteers, contractors, consultants and other parties who require such personal information to assist the WinterFrolicD’hiver with managing relationships with individuals, including third parties that provide services to the WinterFrolicD’hiver

or on the Frolic's behalf and third parties that assist the WinterFrolicD'hiver in the provision of services to an individual.

WinterFrolicD'hiver will obtain consent for the disclosure of personal information where required by applicable law and may disclose personal information without knowledge or consent where permitted to or required by applicable laws or regulatory requirements.

Personal information may be disclosed or transferred to another party during the course of, completion of, a change in ownership of, or the grant of a security interest in, or an exit from all or a part of the WinterFrolicD'hiver or its various businesses or operations. For example, an asset sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations, and required to use or disclose personal information in a manner consistent with the use and disclosure provisions of this Privacy policy, unless an individual consents otherwise.

The WinterFrolicD'hiver may disclose personal information collected concerning:

1. Market trends and activities impacting businesses and operations;
2. Media and public relations activities; and,
3. Interactions with WinterFrolicD'hiver employees, volunteers, program participants, WinterFrolicD'hiver guests, WinterFrolicD'hiver neighbours and members of the community.

This enables the WinterFrolicD'hiver to respond to market trends and needs, to better understand and operate businesses and operations and to plan for the future.

Further, personal information may be disclosed:

1. As permitted or required by applicable laws or regulatory requirements;
2. To comply with valid legal processes such as search warrants, subpoenas or court orders;
3. As part of the WinterFrolicD'hiver's recognition of its employees or volunteers in its various publications and other communications, such as the WinterFrolicD'hiver's annual report;
4. To protect the rights and property of the WinterFrolicD'hiver;
5. In conjunction with an individual's participation in some or all of the programs that the WinterFrolicD'hiver may offer;
6. During emergency situations or where necessary to protect the safety of a person or group of persons;
7. Where the personal information is publicly available; or,
8. With an individual's consent.

## SECURITY, CONSENT AND ACCESS

The work product of the WinterFrolicD'hiver's employees and volunteers, whether in paper record, computer files, or in any other storage format, belongs to the WinterFrolicD'hiver.

Accordingly, such work product, whether it is stored electronically, on paper or in any other format, and the tools used to generate that work product, are always subject to review and monitoring by the WinterFrolicD'hiver. Pursuant to the acceptable computer use and acceptable email use policies, the WinterFrolicD'hiver has the capability to monitor all employees' computer and e-mail use.

In the course of conducting business, WinterFrolicD'hiver may monitor the activities of individuals in respect to WinterFrolicD'hiver operations and property. For example, some locations are equipped with surveillance cameras. These cameras are generally in high risk areas or entrances to facilities. Where in use, surveillance cameras are there for the protection of employees, volunteers and third parties, and to



protect against theft, vandalism and damage to WinterFrolicD’hiver goods and property. Generally, recorded images are routinely destroyed and not shared with third parties unless there is suspicion of a crime, in which case they may be turned over to the police or other appropriate government agency or authority. Surveillance undertaken is not meant to suggest that all individuals will in fact be monitored or their actions subject to surveillance. It is meant to highlight that such monitoring may occur and may result in the collection of personal information from individuals.

When using WinterFrolicD’hiver equipment or resources, employees and volunteers should not have any expectation of privacy with respect to their use of such equipment or resources.

The WinterFrolicD’hiver endeavours to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to protect personal information from loss and unauthorized access, copying, use, modification or disclosure. The WinterFrolicD’hiver uses appropriate security measures when destroying personal information, including shredding paper records and permanently deleting electronic records.

WinterFrolicD’hiver will notify the Office of the Information and Privacy Commissioner of New Brunswick, without delay, of a security breach affecting personal information if it creates a real risk of significant harm to individuals.

The WinterFrolicD’hiver retains personal information only as long as is reasonable to fulfil the purposes for which the personal information was collected or for legal or business purposes. WinterFrolicD’hiver renders personal information non-identifying, or destroys records containing personal information when the organization no longer needs the personal information.

## Logging practices

The WinterFrolic logs HTTP requests to the WinterFrolicD'hiver Web server. These logs record the IP address of site visitors. An IP address is the number automatically assigned to the computer or to the ISP (Internet Service Provider) requesting a URL.

Our logging is passive and we don't use technologies such as "cookies" or "Web bugs" to maintain any information on site visitors. Logged information, also known as clickstream data, is recorded in non-identifiable form and is used by WinterFrolicD'hiver staff or those under contract for Web site system administration. Log files are archived and used for systems analysis, maintenance and site evaluation.

If you have any questions about this Web site, use and disclosure practices, please contact WinterFrolicD'hiver, 361 Smythe Street, Fredericton, New Brunswick E3B 4Y9