

## PRIVACY POLICY

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**Effective Date:** September 22, 2021

**Supersedes / Amends:**  
No Previous Policy

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### 1. Purpose

The purpose of this policy is to foster community public trust by establishing clear accountability statements, including roles and responsibilities, for the protection of personal information collected, used, disclosed and disposed by LMCG.

### 2. Definitions

For the purposes of this policy, the following definitions apply:

“**Board**” means the Board of Management of LMCG.

“**Collection**” means the collection of personal information from or about the individual to whom the information relates including unintended or unprompted receipt.

“**Disclosure**” means the release of personal information by any method (e.g., sharing information by any means such as verbally, sending an email, posting online) to anybody or person.

“**LMCG**” means Leaside Memorial Community Gardens.

“**Personal Information**” means recorded information about an identifiable individual. Refer to section 2 (1) of the *Municipal Freedom of Information and Protection of Privacy Act* for additional information

[http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_90m56\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90m56_e.htm). Examples of personal information include but are not limited to: home address, personal email address, home phone number, ethnic origin, religion, age, gender and sexual orientation.

### 3. Objective and Policy Statement

#### 3.1 **Objective**

Protecting your personal information is very important to us. LMCG collects your personal information to provide you with services at the facility. We protect your personal information from unauthorized collection and use. You have the right to access your own information and to request that inaccurate information is corrected.

### 3.1 **Policy Statement**

LMCG will:

- a. Ensure all employees share responsibility for the protection of personal information privacy and compliance with the roles and responsibilities identified in this policy;
- b. Plan for and ensure that privacy protection requirements are embedded in the design of all LMCG facility programs and services.
- c. Establish and communicate a set of privacy standards and guidelines to improve the protection of personal information by identifying, investigating, assessing, monitoring and mitigating personal information privacy risks in LMCG programs and activities involving the Collection, use, Disclosure and disposal of personal information.
- d. Apply this policy and related policies and practices in the Collection, use, Disclosure, and disposal of personal information.

### 4. **Application and Compliance**

- 4.1 This policy applies all LMCG management, Board members, employees, volunteers and contract employees hired by LMCG.
- 4.2 All LMCG management, Board members, employees, volunteers and contract employees hired by LMCG are responsible for complying with this Policy.

### 5. **LMCG Privacy Principles**

- 5.1 LMCG is committed to maintaining the accuracy, confidentiality, and security of your Personal Information, which includes both digital and social media information. As part of this commitment, this policy governs our actions as they relate to the Collection, use and Disclosure of Personal Information. This policy is based upon the City of Toronto's Protection of Privacy Policy.
- 5.2 LMCG is responsible for maintaining and protecting the Personal Information under our control. We have designated individual(s) who are responsible for compliance with our privacy policy. In addition, it is our responsibility to limit access to information that is deemed private, which includes any photographs. As a result, our facility is governed by our "no cameras/photos" policy within our facility.
- 5.3 **Identifying Purposes.** LMCG shall Collect, use and Disclose Personal Information to provide you with services and facility access that you have requested either directly or indirectly, through individual user groups. In certain circumstances, the purposes for which information is collected may be clear, and consent may be implied, such as where your name, address and payment information are provided and required as part of the process to access services or the facility.
- 5.4 LMCG generally does not collect information that is identifiable to children. When we do, it is on a limited basis and with the expectation of adult supervision or permission. For

example, we may receive children's names, and associated adult contact information. In such cases, we strictly limit the use of that personal information to the purposes for which it was collected.

- 5.5 **Consent.** Whenever LMCG Collects your personal information, we will identify the purposes for which we will use that information. Knowledge and consent are required for the collection, use or disclosure of Personal Information except where required or permitted by law.
- 5.6 Providing us with your Personal Information is always your choice. However, your decision not to provide certain information may limit our ability to provide you with the requested services. We may collect your personal information for a variety of reasons, including: sending you information and communications; responding to inquiries and other requests; conducting contests and promotions; processing transactions; optimizing your experience at our facility; and for internal purposes such as analyzing and managing our business and improving our products, services, and promotion efforts.
- 5.7 **Limiting Collection.** The Personal Information collected will be limited to those details necessary for the purposes identified by us. With your consent, we may collect Personal Information from you in person, over the telephone or by corresponding with you via mail, e-mail, facsimile, or the Internet.
- 5.8 **Limiting Use, Disclosure and Retention.** Personal Information may only be used or disclosed for the purpose for which it was collected unless you have otherwise consented, or when it is required or permitted by law. Personal Information will only be retained for the period of time required to fulfill the purpose for which we collected it or as may be required by applicable law.
- 5.9 **Accuracy.** Personal Information will be maintained in as accurate, complete, and up-to-date form as is necessary to fulfill the purposes for which it is to be used.
- 5.10 **Safeguarding Customer Information.** Personal Information will be protected by security safeguards that are appropriate to the sensitivity level of the information. We take all reasonable precautions to protect your Personal Information from any loss or unauthorized use, access, or Disclosure.
- 5.11 **Openness.** We will make information available to you about our policies and practices with respect to the management of your Personal Information.
- 5.12 **Customer Access.** Upon request, you will be informed of the existence, use and disclosure of your Personal Information, and will be given access to it. You may verify the accuracy and completeness of your Personal Information, and may request that it be amended, if appropriate. However, in certain circumstances permitted by applicable law, we will not disclose certain information to you.
- 5.13 **Handling Customer Complaints and Suggestions.** You may direct any questions or enquiries with respect to our privacy policy or our practices by filling out the requisite information on our website located at <https://leasidgardens.com/contact-us/>.