

Privacy Policy

Last updated September 22, 2023

POLICY BRIEF & PURPOSE

This privacy policy ("Privacy Policy") addresses how the Canadian International Organ Competition (the "CIOC", "we", "our") handles information we gather from third parties including, but not limited to, patrons, donors and visitors of our website, <https://ciocm.org/>, (the "Website"), ("you", "your").

This Privacy Policy describes the ways we collect, use and share Personal Information. Our Privacy Policy applies whenever you visit the Website; make a donation or proceeds to any other transaction with CIOC.

Your privacy is important to us. The CIOC is committed to protecting your personal information according to applicable provincial data protection laws, such as the *Act respecting the protection of personal information in the private sector (Quebec)* and the *Personal Information Protection and Electronic Documents Act (PIPEDA)* (federal), and according to applicable data privacy regulators best practices for businesses and charitable non-profit organizations.

Please read this Privacy Policy carefully. By using our Website, or otherwise providing us with your Personal Information, you are hereby consenting to the CIOC's collection, use, and disclosure of your Personal Information in accordance with this Privacy Policy.

If you do not consent to the practices described in this Privacy Policy, you may not continue to use our Website.

For the purposes of this Privacy Policy:

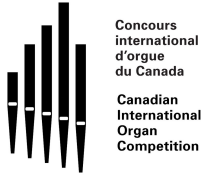
"Personal Information" means any information that relates to you and either identifies you directly or could be used to identify you with other information available. It includes your name, email address, phone number, mailing address and payment information. It does not include data where the information that identifies you has been removed, such as pseudonymised or anonymous data, and you can no longer, directly or indirectly, be identified.

KEY HIGHLIGHTS

We understand that your time is valuable. Therefore, we have set out in this section some important highlights of our Privacy Policy. You can obtain more information about how we collect, use, disclose and otherwise handle your Personal Information by reviewing the full Privacy Policy. We encourage you to read the full Privacy Policy, as it contains important information for you.

We collect a variety of Personal Information from Website visitors, subscribers, donors and patrons, depending on how they interact with our Website or our activities and services. This includes:

- Ticket purchaser and donor information;
- Marketing and communication data provided to us by Website visitors, donors, patrons or e-news subscribers;



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- Volunteering applications;
- Information collected via tracking technologies and cookies on the Website, in accordance with our Cookie Policy;
- Information to provide customer service to CIOC Events and partner organization events; and
- As otherwise permitted or required by law.

[Learn more.](#)

We Use this information for the following purposes:

- Providing you with ticketing and donor services
- Providing you with communications on activities;
- Sending out marketing and promotional materials in accordance with your preferences;
- Billing coordination; and
- Improvements to our services, Website, and marketing strategies;
- As otherwise permitted or required by law.

[Learn more.](#)

We may Share Personal Information with the following entities as necessary to provide our services:

- Credit card processors to manage payment processing;
- Third party service providers, only as necessary to assist in providing certain components of our services, and only with contractual requirements in place to protect the Personal Information and handle it only in accordance with this Privacy Policy;
- Other entities as permitted or required by law.

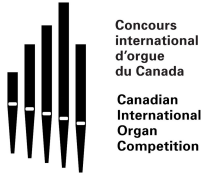
[Learn more.](#)

We protect your Personal Information with industry-standard administrative, technical, organizational, and physical security measures. These measures include firewalls, SSL encryption, password protection, and limiting storage of financial information to a Payment Card Industry compliant third party provider. However, no data transmission over the internet is completely secure. Therefore, we cannot guarantee that your Personal Information submitted through the Website or Mobile Application will be completely secure.

[Learn more.](#)

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1. TYPES OF PERSONAL INFORMATION COLLECTED BY THE CIOC

The CIOC may collect, store, use and transfer different kinds of Personal Information about you, as described below:

Ticket purchaser and donor information. You may provide us with your contact information such as name, email address, mail address, phone number and, when applicable, payment information such as billing address and a debit/credit card number, or other order information when you make a donation or purchase a ticket with us. We may also collect your birth date and age, your ticketing and donation histories, your seating preferences and any medical information related to that, your artistic programming interests, information regarding your family members and their interests with respect to the activities of the CIOC.

Marketing and Communications. We may collect, store, and process information that you provide to us when you communicate with us, including when you email us, call us, or use the contact feature on our Website, or subscribe to our newsletter. We also store and process your preferences in receiving marketing materials from us and your methods and preference of communication, including your language preferences.

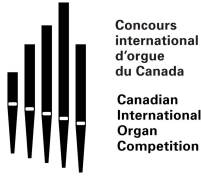
Volunteering Applications. We may collect, store, and process information that you provide to us when you communicate with us via email or phone, to contribute to the CIOC and apply to become a volunteer, such as your name, your email address, your telephone number, your CV, your cover letter, any references or other information that you may provide to us in support of an application and/or recruitment process.

Log Data, Activity Tracking and Cookies. CIOC collects certain information automatically from visitors of the Website, such as internet protocol (IP) addresses and associated geolocation data, browser types, referring domains, timestamps (time a page was accessed as well as time spent on each web page), as well as the specific pages the visitor has requested. This information is only visible to us anonymously, with no name, address, or other identifying information attached. We collect such information using cookies and similar technologies. To prevent your browser data from being used by Google Analytics on our Website and others, learn about [Google Analytics' currently available opt-outs](#). For more information, see our Cookie Policy available on the banner of our Website, on the bottom left of the Website.

Other. We also collect and use certain aggregate data, which has been anonymized, such as statistical data regarding use of our Website or you donation or transactions with us, for lawful purposes. As noted above, this type of data is not considered “Personal Information” subject to privacy laws because it cannot be used to identify, directly or indirectly, a particular person. The CIOC also collects information from published or public sources for the purpose of its fundraising activities to better understand their supporters and their philanthropic giving.

We avoid collecting any of the following sensitive categories of Personal Information about you: information regarding your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, health, genetic or biometric data.

2. HOW PERSONAL INFORMATION IS USED BY THE CIOC



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We will only use your Personal Information when the law allows us to.

Providing Ticketing Services, Receiving Donations and Activities Communications. Your information is used primarily for ticket and donation transactions so we can deliver tickets and tax receipts to you. If you ever provide card information over the phone, in writing, or by email, we immediately destroy or irretrievably delete this information once a transaction has been processed. We also want to ensure we know your preferences for how we communicate with you. Those preferences can be set or changed anytime by contacting us at protectionrenseignements@ciocm.org.

Marketing and Promotion. CIOC uses the information listed in the above section above to contact Website visitors, donors and patrons to send you information regarding CIOC, such as information about CIOC events and partner organization events or promotions. From time to time, we may use this information to conduct market research. Any such communications will be sent in accordance with your marketing preferences and consent choices. We may also email you with service-related information concerning our events and program, fundraising or the Website to the extent permitted by law and in light of the business relationship between us. You may opt out of receiving marketing materials at any time by contacting us at protectionrenseignements@ciocm.org to adjust your marketing and communication preferences or following the unsubscribe instructions included in each marketing communication.

Fundraising. We may also use your Personal Information to conduct fundraising campaigns through personal solicitation, direct mail and email.

Volunteering Application. We may use your Personal Information to create, process and assess your application when you want to become a volunteer, and thereafter to manage our relationship with you as a volunteer, and maintain a record of your application for future opportunities.

Billing Coordination. All financial and billing information collected through the Website or through any other way directly from you is used solely to provide you, as applicable, with our ticketing services and to bill for such services, and to comply with any administrative and legal requirements with respect to donation and fundraising activities.

Improvements. We also use your Personal Information to improve your experience when using the Website, to provide customer services, to diagnose technical problems, to support marketing activities and so that we may better administer and improve the quality of both the Website and our activities. We may also collect composite tallies of website page views, search terms, and other traffic information useful for improving the design and content of our Website. This type of data is not considered "Personal Information" subject to privacy laws because it cannot be used to identify a particular person.

To Enforce Compliance with Our Policies. CIOC may access your information if necessary to investigate a suspected violation of our rights.

To Maintain Legal or Regulatory Compliance. Our activities are subject to certain laws and regulations which may require us to use your Personal Information. For example, to provide auditors with copies of our tax receipts, invoices, and as otherwise required by law. Without using your Personal Information for such purposes, we could not perform the activities in accordance with our legal and regulatory requirements.

3. SHARING OF PERSONAL INFORMATION

The CIOC does not share, exchange or sell its list of patrons. We will not copy, distribute, disclose or otherwise share any of your Personal Information except as set out in this Privacy Policy.

We may share your Personal Information in the following ways:

- **Credit Card processing:** We uses a third-party service provider, 9355-0861 Québec Inc. (dba Zeffy), to manage card payment processing for donations and ticketing transactions. Once a transaction has been completed, this service provider no longer allow our organization to

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view your card number. This service provider is not permitted to store, retain, or use billing information except for the sole purpose of credit card processing on CIOC's behalf. You may review its privacy policy at <https://docs.zeffy.com/legal/english/privacy-policy>.

We also use Square for some credit-card transactions, including CD and merchandise sales, and occasionally for ticketing and donations. You may review their privacy policy at <https://squareup.com/ca/en/legal/general/privacy>. Additional service providers that we occasionally use for these same types of transactions include Paypal (you may review its privacy policy at <https://www.paypal.com/myaccount/privacy/privacyhub>) and Canada Helps (you may review its privacy policy at <https://www.canadahelps.org/en/privacy-policy/>). None of these service providers are permitted to store, retain, or use billing information except for the sole purpose of credit card processing on CIOC's behalf.

In addition to payment processing, each of the above payment platforms is used to store general contact information and communication preferences (such as name, address, phone number, email, language preference, etc.) for our Website visitors, subscribers, donors, and patrons who interact with them.

- **Other third party service providers:** We also use other platforms to store contact information, such as our donor management software GiftWorks (you may review its privacy policy at <https://www.frontstream.com/privacy-policy>) and the Office 365 Suite (you may review its privacy policy at <https://privacy.microsoft.com/en-ca/privacystatement>). We also store contact information for our email newsletter subscribers on Mailchimp (you may review its privacy policy at <https://www.intuit.com/privacy/statement/>).
- **Law Enforcement:** We may be required in certain circumstances to disclose Personal Information in response to a lawful request by public authorities, courts, law enforcement, or to comply with national security requirements. To the extent allowed by applicable law, we will notify you before a disclosure is made.
- **Consent:** We may disclose your Personal Information with third parties where we have consent to do so, except as otherwise prohibited by law.

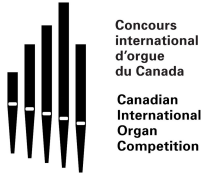
Your Personal Information may be transferred and processed outside of Quebec, but only in other provinces or territories of Canada. Specifically, the Website is hosted on servers located in Montréal, Québec (Canada). Our third party service providers and partners may operate around the world. This means that when we collect Personal Information, such information may be processed in any of these countries, and accordingly, may be accessible to courts, law enforcement and national security authorities of those countries.

If you have any questions, or wish to obtain further written information about the CIOC's policies and practices with respect to the collection, use, disclosure or storage of your Personal Information by service providers outside of Canada, you may contact our privacy officer at protectionrenseignements@ciocm.org.

4. THIRD PARTIES WEBSITE

The Website may contain links to other websites. We provide these links to you only as a convenience, and the inclusion of any link does not imply endorsement by the CIOC of the linked website or any association with its operators.

The linked websites have separate and independent privacy statements, notices, policies and/or terms of use, which we recommend you read carefully. Any concerns regarding any product or service



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offered by a website to which the Website is linked or the link itself should be directed to the operator of that specific website and not to the CIOC.

If you use these links, you are leaving the Website. The CIOC has not reviewed all of these third-party websites and does not have control over, and is in no manner responsible or liable for, the availability and content of the websites to which the Website is or may be linked or how the operators of the linked websites may collect, use, share and otherwise handle your Personal Information.

The CIOC makes no representations whatsoever about any other website you may access through the Website and disclaims all liability with regard to your access to such linked websites. If you access any of the third party websites linked to the Website, you do so at your own risk. This Privacy Policy does not address the privacy and data security practices of any third parties, including third party website operators.

5. RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

We retain Personal Information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with the services you have requested, to comply with applicable legal, tax or accounting requirements, or to defend ourselves from possible legal actions). When we have no ongoing legitimate business need to process your Personal Information, we will destroy it or anonymize it in accordance with applicable laws. For more details on retention and destruction, please see the CIOC's [Data Retention and Destruction Policy](#).

6. SAFEGUARDING YOUR PERSONAL INFORMATION

The CIOC adheres to all the current best practices to protect your personal information. We use appropriate administrative, technical, organizational and physical security measures to protect your Personal Information against accidental or unlawful destruction, loss, and alteration, and against unauthorized use, disclosure, access and fraud. The security measures in place take into account the sensitivity of the information we have on file.

However, because no data transmission over the Internet or storing of electronic data is ever 100 percent secure, we cannot guarantee that your Personal Information will never be accessed, used, or released in a manner that is inconsistent with this Privacy Policy. By using our Website, you agree to assume all risk in connection with the security of your Personal Information sent to or collected by us through this Website.

Your information is stored securely by locking copies of physical information in filing cabinets, and providing password protection for information stored electronically, effectively restricting access to only authorized individuals.

Within the CIOC, personal information is shared with employees, namely our executive director, our artistic operations and development manager, our artistic director, our marketing and communications director, our accountant and our administrative assistants, and sometimes our volunteers, only as required in order for them to carry out their responsibilities. All employees and volunteers who handle personal information are trained on how to do so properly.

We have procedures in place to address any suspected personal data breach and will notify you and any applicable regulator of a breach as required by law.

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For a more comprehensive description on measures taken by the CIOC to protect your personal information, please refer to the CIOC's [Personal Information Handling & Management Policy](#).

7. CHILDREN'S PERSONAL INFORMATION

The Website is not intended for use by any person under the age of 14. We do not intentionally collect any Personal Information from children under 14 years old through our Website or otherwise, nor do we sell or promote our products or services to children under 14 years old. Please do not allow children under the age of 14 to provide any Personal Information or use our Website. If you believe that a person below the age of 14 has provided their Personal Information to the CIOC, please contact our privacy officer at protectionrenseignements@ciocm.org and we will use reasonable efforts to promptly remove that information from our systems, subject to any legal or actual limitations.

8. YOUR DATA PROTECTION RIGHTS

You can exercise any one of the following data protection rights as may be available to you under applicable law, subject to actual and legal restrictions, by contacting us at protectionrenseignements@ciocm.org.

We will acknowledge and respond to your requests promptly and in all cases no later than within 30 days unless required to respond sooner under applicable law. In certain jurisdictions, we may need to verify your identity before responding to your request.

Depending on your jurisdiction, you may have the following data protection rights:

- To access, correct or update your Personal Information;
- To request the deletion of your Personal Information;
- To opt out of marketing communications at any time, even if you have previously consented to receiving them;
- To withdraw your consent to our continued use or disclosure of your Personal Information;
- To request portability of your Personal Information; or
- To ask a question or express a concern or complaint regarding our Privacy Policy or the processing of your Personal Information.

For more details on the submitting of a request, and how requests will be handled, please see the CIOC's [Process for Handling Inquiries and Complaints related to Privacy](#).

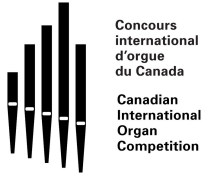
9. CHANGES TO THIS PRIVACY POLICY

This Privacy Policy may change from time to time, as reflected in the revision date above, to reflect changing legal, regulatory or operational requirements. CIOC will provide notification of changes to this Privacy Policy through the Website with reasonable advanced notice prior to the change taking effect. Where appropriate, we may also email you, if you have opted to receive communications from us, to notify you of changes to this Privacy Policy. If we are required by applicable data protection laws to obtain your consent to any material changes to this Privacy Policy, then we will do so before such changes take effect. Your continued use of this website after we make changes constitutes deemed acceptance of these terms.

10. CONTACT

You can contact our privacy officer, Mary-Beth Campbell, at any time by:

- email at protectionrenseignements@ciocm.org; or



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- phone at +1 514 510-5678; or
- mail sent to: 1195, rue Sherbrooke Ouest, Montréal (Québec) H3A 1H9, Canada