*Organization of Military Museums of Canada Inc.(OMMC)*

*l’Organisation des musées militaires du Canada, enr (OMMC)*

2513 Beacon Avenue, PO Box 2204, Sidney, BC, V8L 3S8

OMMC Policy

Protection of Personal Information

Requirement for this Policy

1. As a national not-for-profit institution in Canada, incorporated under federal law, OMMC is required by the federal *Personal Information Protection and Electronic Documents Act* (PIPEDA) (S.C. 2000, c.5) to have a clear policy on protection of personal information which it receives. The policy must state how and why the information may be collected, who in the organization is responsible for custody and protection of the information and who in the organization is responsible for responding to queries or complaints regarding the management and protection of personal information. The policy is to be made available to all members of the organization and to any other person with an interest in it.

Personal Information Defined

2. Personal information which OMMC may collect and for which it would then be responsible can include a person’s name, military rank (current or retired), home postal address, work or business postal address, e-mail address(es), telephone number(s), fax number(s), credit card number, bank account number, debit card number, date of birth, occupation and occupational title, affiliated museum, spouse/partner name, emergency contact person name and telephone number, diet limitations and OMMC membership number. There are many other personal information elements – eg., various physical and medical data, Social Insurance Numbers, etc., but OMMC will not ask for such information. Generally, a person’s name, postal address and telephone number, all of which may appear regularly in a public directory, and military rank (current or retired) will not be considered to be personal information requiring protection under PIPEDA or this policy unless the member concerned specifically requests that dissemination of the information be restricted.

Collection of Personal Information

3. Personal information will be collected by OMMC from applications for membership or membership renewal, from applications for registration at an OMMC training course or by the Secretary obtaining OMMC Director’s information required for annual Registered Charity Information Returns (RCIRs) to the Canada Revenue Agency (CRA) and for maintaining corporate registration with Industry Canada (IC). The forms used by OMMC for membership matters and for course registrations will be designed to collect only that personal information necessary for those purposes.

Releasing Personal Information Held by OMMC

4. Personal information held by OMMC will only be released to meet the purposes for which it was collected, eg., hotel reservations at a training course, annual RCIRs and annual IC corporate registration (Directors data only), or when required by law - an order by a court or a valid request from a police service. OMMC will not release its membership list to any other organization. Within OMMC, personal information will only be regularly available to the President, Vice President, Treasurer, Secretary, Membership Coordinator and the accountant, and may be available to other Directors for particular projects if necessary. The membership list will not be accessible via the OMMC website.

OMMC Privacy Officer

5. The Secretary is the Privacy Officer of the OMMC. The Secretary may be contacted by e-mail at ommcinc2@gmail.com or by postal mail at:

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Registers of Personal Information Required by Law

6. OMMC is incorporated under the *Canada Corporations Act, Part II* (CCA) and is required by that law to maintain registers of directors and of members, and will be required by the *Canada Not For Profit Corporations Act* (S.C. 2009, c. 23) (CNFPCA) in future to maintain a register of directors, a register of officers and a register of members. The registers will be maintained by the Secretary and will be open to inspection by any OMMC member, at or in close proximity to the official address of the OMMC at such time and on such date as arranged with the Secretary. The register of members created to meet CCA requirements will be continued when OMMC is approved for continuance as a federal not-for-profit corporation under the CNFPCA. As prescribed by the CNFPCA *Regulations*, the register of members will include, for each member:

- the member’s name, his/her own or that of the museum, as applicable;

- the member’s current residential or business address, as applicable;

- the member’s e-mail address, if the member has consented to receive OMMC information or

documents by electronic means;

- the date on which the member joined the OMMC and, when applicable, the date when the person or

museum ceased to be a member; and

- the member’s class or group of membership, if any.

Since all directors must be members of OMMC and since all officers must be directors, some OMMC members will have personal information recorded in each of the three registers. These registers will be permanent documents, part of OMMC corporate records.

Inspection of Personal Information and Correction of Errors

7. Any member may ask for a copy of his/her personal information held by OMMC. The request must be in writing and forwarded to the Secretary by e-mail or by postal mail to the appropriate address stated above. The Secretary will gather the information from the persons holding it - these persons will frequently not all be in the same location - and will respond to the requesting member. The response will only be made by postal mail as OMMC will not distribute personal financial information via e-mail. OMMC will not charge a fee for responding to such requests from members.

8. A member finding error(s) in his/her personal information should bring the error(s) to the attention of the Secretary without delay.

Attendance at Annual Training Courses

9. OMMC will publish a list of all persons who attend the annual training course. The list will be provided at no charge to all attendees and to any other member of OMMC who was unable to attend and who requests a copy of the list. Information in the list will normally be limited to the member’s name, the name of the museum represented, the postal address, the telephone and fax numbers and the e-mail address of that museum. Persons attending the course who are OMMC members without museum affiliation and who wish their contact data to be included in the list of attendees will be required to state that preference in their registration for the course.

Training Course Photographs

10. OMMC organizes a group photograph of persons attending annual training courses. This photograph will be published in electronic form in an *OMMC Bulletin* issued after the course. To the extent practical, persons included in the photograph will be named. Persons who do not wish to appear in the photograph may opt out.

Publishing Personal Information in the *OMMC Bulletin* or in OMMC Public Relations Documents

11. Personal information of members, as well as their individual photographs, will only be included in the *OMMC Bulletin* or in OMMC public relations documents with the specific consent of the member(s) concerned. This rule does not apply to the course group photograph.

Retaining Personal Information

12. OMMC will retain personal information only for the period required by law. Documents containing personal information will only be destroyed by shredding by machines which produce only small paper chips, not strips which can be reassembled. General retention periods for documents which may contain personal information are as follow:

a. Registers of directors, officers and members, and the Minutes of all Annual and Special General

Meetings – permanent records (CNFPCA);

b. Receipts for charitable donations - six years after the end of the calendar year in which the

donation was made (CRA income tax rules);

c. Membership application forms, membership renewal forms, course registration forms – six years

after the end of the financial year to which they apply (CRA rules for charity administration). For

OMMC, the financial year is the calendar year; and

d. General financial documents which are input data for the annual financial statements – eg., credit

card slips, material purchase receipts, cheque stubs – six years after the end of the financial year to

which they apply (CRA rules for charity and federal not-for-profit corporation administration).

Internet Web-site Links

13. The OMMC internet website contains links to other websites. OMMC is not responsible for the privacy practices of the owners of those other websites. Persons using the OMMC website to link to other websites are strongly encouraged to read the privacy statements of each and every website that collects personally identifiable information. This Protection of Personal Information Policy applies solely to information collected by OMMC.

Policy Availability

14. This policy will be provided to all new members with their membership card and to all members renewing membership in the first calendar year after it is approved by the Board of Directors. The policy will also be available to members and to the general public through the OMMC Internet web-site.

Questions or Complaints Regarding Application of the Policy

15. All questions regarding the application of this policy should be made to the Secretary, preferably in writing, at one of the addresses stated at paragraph 5 above. All complaints regarding the application of the policy shall be made in writing and addressed to the Secretary at the postal address stated at paragraph 5 above. Complaints regarding the action of the Secretary with regard to this policy shall be made in writing and addressed to the President, OMMC, at the postal address stated at paragraph 5 above.

Other Legislation – Applicability

16. The *Privacy Act* (R.S.C., 1985, c.P-21) does not apply to OMMC as it is not a component of the Government of Canada. Provincial privacy and protection of personal information legislation does not apply here as OMMC is incorporated federally under the CCA, Part II*.* This condition will continue when OMMC becomes incorporated under the CNFPCA.

Board of Directors Approval

17. This policy was approved by the Board of Directors, OMMC, at its meeting held 21 May 2013 and became effective on that date.