

Toronto SharePoint User Group - Privacy Policy

Last Updated: October 6, 2009

1. Purpose and Principles

The **Toronto SharePoint User Group** (“TSPUG”) guarantees that we will safeguard personal information that individuals entrust to us. This policy implements the principles of Canada’s *Personal Information Protection and Electronic Documents Act* (PIPEDA), though it is the goal of TSPUG to exceed the requirements of PIPEDA and any other applicable legislation to ensure both the integrity of the organization and the privacy of all those who participate in our activities and communications.

Link: [The PIPEDA Privacy Principles](#)

2. Accountability

TSPUG appoints a Privacy Officer to ensure our policies and procedures remain effective. Everyone on our executive committee, and all members, partners, presenters, volunteers, and the third-parties who act on TSPUG’s behalf are required to comply with this policy.

The TSPUG Privacy Officer may be contacted at:

TSPUG Privacy Officer
c/o Toronto SharePoint User Group
451 Concord Avenue,
Toronto, Ontario M6H 2P9
Phone: +1.416.789.5169

3. Purpose of Collection

TSPUG collects information in order to best serve the SharePoint community. TSPUG asks for personal information at different times for different purposes, for example: during registration to become a TSPUG member, during registration for a specific meeting, during meetings (e.g. session evaluations), when calling for volunteers, and in surveys conducted on our website. We use this information to deliver on what was promised when the information was provided, and retain it to make each process easier to repeat.

Example: To ensure that only real people can register for events we may require that each person creates an account using an e-mail address that we can verify using the “call and response” pattern. Rather than repeat the verification process for every meeting, we’ll ask that people create an account to register for future meetings as well.

TSPUG does not sell or share its membership list for commercial purposes. If you suspect the unauthorized use of our mailing list by a third party, please report the incident immediately.

TSPUG may use web site logs including IP addresses to analyze traffic patterns in order to better serve visitors, or to monitor the security of the website. This information will not be related to individuals.

TSPUG's website and other sites providing TSPUG services may store HTTP cookies on computers who access these sites. The storage of "cookies" can be disabled, though this will make some website features inaccessible. TSPUG does not use cookies

This policy does not cover the use of aggregate and/or statistical data from which the identity of individuals cannot be determined. TSPUG will use such data to report on its activity to its members, sponsors and partners as it sees fit.

Example: Reports may include the number of attendees at a meeting or event, a breakdown by job role, or how many people were interested in a particular future topic. TSPUG will *not* share what companies were in attendance at a meeting, contact information of attendees, or other personally identifiable information.

4. Consent

By providing personal information to TSPUG, or to a third party acting on behalf of TSPUG (e.g. an event registration site), individuals are consenting to the use of that information in accordance with this policy. The purposes for the collection, use or disclosure of the information will be provided at the time of collection. TSPUG has the individual's implied consent to collect or retrieve any supplemental information required to fulfill the same purpose.

All disclosure of personal information is voluntary. If we ever ask for information that you do not wish to provide, simply do not answer. Only information that is required to fulfill an expectation will be marked as required. For example, if registering for e-mail notifications, we do require an e-mail address.

An individual may withdraw consent to the collection, storage, use or disclosure of one's own personal information at any time, subject to legal or contractual restrictions. An individual's decision to withhold particular information may impact TSPUG's ability to provide particular services. The Privacy Officer will make a best effort to explain the options and any associated consequences of refusing to provide information or of withdrawing consent.

5. Security

Personal information is protected by security safeguards appropriate to the sensitivity of the information against loss or theft, unauthorized access, disclosure, copying, use or modification.

Methods of protection and safeguards include – but are not limited to – restricted access to physical media, need-to-know access and electronic measures including the use of passwords, permissions, encryption and firewalls.

6. Limited Use, Disclosure and Retention

Information collected by TSPUG will not be used or disclosed except for the purpose(s) described when it was collected, unless consent for an additional purpose is granted by the individual, or as permitted or required by law.

TSPUG will use information without an individual's consent: when an emergency exists that can be reasonably considered to threaten an individual's life, health or security; when required by law; when collection is required to investigate a breach of security; or when the information is publicly available.

TSPUG will **not** disclose personal information to third parties including names, addresses, telephone numbers, or e-mail addresses, even when permitted by law. Note that this does not prevent individuals from volunteering personal information, for example during meetings and events, or when participating in TSPUG communities (e.g. web sites, e-mail list servers, or instant messaging services).

Personal information will be disposed of – though may continue to be kept on backup media – in any data store that falls out of active use. Archives will be disposed of within five (5) years.

TSPUG is permitted to transfer personal information to a third party without the individual's consent, for specific purposes to which the individual has already consented. TSPUG will obtain guarantees that the third party protects the information and uses it only for the purpose(s) intended by the individual.

7. Openness

Information available to the public includes:

- The name, address and telephone number of TSPUG's Privacy Officer.
- The forms that may be used to access personal information or change information.
- A description of the type of personal information held by TSPUG, including a general statement of its approved uses.
- A copy of this Privacy Policy.

8. Access and Accuracy

Every individual has the right to know their own personal information collected, used and disclosed by TSPUG. One may obtain this information within 30 days of delivering a written request to the TSPUG Privacy Officer, unless there are reasonable grounds for extending the limit.

If personal information is outdated, inaccurate or incomplete, it will be corrected upon request. Archival or inactive data stores will not be updated.

TSPUG will make every reasonable attempt to provide the information requested. Information will be provided electronically, for free when possible or at a nominal charge to cover basic expenses. Individuals making requests requiring extraordinary expenses (e.g.: shipment by courier, recovery of damaged media) are expected to cover the costs.

Access may be denied if the information is prohibitively expensive to extract, contains references to other individuals, or cannot be disclosed for legal reasons.

9. Enquiries and Challenges

Any enquiries concerning the TSPUG privacy policies and procedures, or challenges to the TSPUG's compliance with PIPEDA may be addressed to the TSPUG Privacy Officer. Upon receipt of a complaint TSPUG will record the date it was received, notify the TSPUG Privacy Officer, acknowledge its receipt by telephone or e-mail, and begin investigation of the complaint. The findings and any recommendations of the investigation will be reported to the TSPUG executive committee in writing, and to the membership at the next meeting.

If dissatisfied with the Privacy Officer's findings or remedies, individuals may submit a complaint to the Federal Privacy Commissioner.

Link: [Office of the Privacy Commissioner of Canada \(contact information\)](#)

10. Definitions

IP Address: When an individual's web browser requests a web page from another computer on the Internet, it automatically provides that computer the address to which it should send the web page. This address is called the computer's "IP address."

HTTP Cookies: "In computing, a cookie. . . is a small piece of text stored on a user's computer by a web browser. A cookie consists of one or more name-value pairs containing bits of information such as user preferences, shopping cart contents, the identifier for a server-based session, or other data used by websites." [Source: [Wikipedia](#)]

11. This Policy

This policy is retroactively effective from the date of the first TSPUG meeting: April 13, 2005.

This policy and its prior versions are publicly available on the TSPUG website: <http://www.tspug.com/>

TSPUG is not a registered organization. TSPUG activities and the TSPUG web site are hosted in Ontario, and as such the laws of the province of Ontario governs the implementation, terms, conditions of this policy without giving any effect to any principles of conflict of laws.

This policy will be updated from time to time either to reflect current legislation and applicable laws, or to make improvements. Substantive changes may be ratified a majority of members in attendance at any TSPUG regular meeting. Minor corrections (e.g. updated links, addresses, or spelling) do not require the approval of TSPUG's Executive Committee or members, but will be noted in the following table.

Date	Description
2009-Oct-06	Policy created.

