



Salerno (Devil's) Lake Cottagers' Association

June 7, 2016

Privacy Policy

This Privacy Policy (the “**Policy**”) governs all aspects of how Salerno (Devil's) Lake Cottage Association (“**SDLCA**”, “**Association**”, “**We**”, “**Our**”, “**Us**”) collects, uses, maintains and discloses personal information from all users (“**Users**”, “**You**” or “**Your**”) of this website.

SDLCA values Your Privacy

SDLCA is committed to protecting the confidentiality of all information entrusted to it by Users. SDLCA has prepared this Policy to inform Users of our policy and practices concerning the collection, use and disclosure of Personal Information.

Personal Information that SDLCA collects.

We, from time-to-time, may collect personally identifiable information (“**Personal Information**”) from Users. This includes name, home and cottage address (for Users that are members of the Association (“**Members**”)), phone numbers, email addresses that You provide, our own records regarding the status of a Member's payment of dues, information collected electronically about how You use our website (e.g. by tracking the number of unique pageviews received by the pages of the website) or via cookies.

In some instances, You may have received or created a unique client ID and created a password in order to use the secure or restricted portions of this website. You are requested not to divulge Your client ID or password to anyone other than SDLCA personnel and then only for the purpose of permitting them to provide service to You.

SDLCA has no control over the content of third party websites that may be identified on the SDLCA website or, if applicable, accessed through hyperlinks.

Your Consent

Your provision of Personal Information to SDLCA means that You agree and consent that SDLCA may collect, use and disclose Your Personal Information in accordance with this Policy. If You do not agree with these terms, You are requested not to provide any Personal Information to SDLCA. Certain services can only be offered if You provide

Personal Information to SDLCA. Consequently, if You choose not to provide Us with any required Personal Information, SDLCA may not be able to offer You certain services.

How SDLCA uses Personal Information

SDLCA may, from time-to-time, use Personal Information collected through this website to: (i) send Members newsletters, letters or e-mails on various subjects that may be of interest to the Members; (ii) send Members membership renewal notices; and (iii) contact Members at their cottages for emergency purposes.

SDLCA's use of Personal Information is limited to these purposes. Unless permitted by law, no Personal Information about a User is collected, without first obtaining the consent of the individual to the collection, use and dissemination of that information.

Disclosure of Personal Information

SDLCA will use all information collected from their Users for internal purposes only. SDLCA may disclose Personal Information of Users to organizations that perform services on behalf of SDLCA ("**Service Providers**"). Personal Information will only be provided to Service Providers if they agree to use such information solely for the purposes of providing services to SDLCA and under the instruction of SDLCA and, with respect to that information, to act in a manner consistent with the relevant principles articulated in this Policy. However, SDLCA bears no responsibility for any other use of such Personal Information by the Service Providers.

Please note that there are circumstances where the use or disclosure of Personal Information may be justified or permitted or where SDLCA is obliged to disclose information without consent. Such circumstances may include:

- Where SDLCA believes in good faith that the law requires it;
- Where SDLCA believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety or property of an identifiable person or group; or
- Where the information is public.

Where obliged or permitted to disclose information without consent, SDLCA will not disclose more information than is required. SDLCA does not sell or otherwise disclose to third parties any Personal Information that it has obtained.

Maintenance and Security of Personal Information

SDLCA retains Personal Information about Users as long as SDLCA believes it is necessary to fulfill the purpose for which it was collected. SDLCA keeps all paper membership registration forms. Personal Information about Members who register via Our website is kept in a database supported by our Service Providers and that information is protected using industry standard security measures. We cannot guarantee that the information submitted to, maintained on, or

transmitted from our systems will be completely secure and transmission of information over the Internet is susceptible to possible loss, misrouting, interception and misuse.

Access to Personal Information

SDLCA provides individuals with access to Personal Information held about them.

If an individual believes that their Personal Information of file is not correct, they may request an update of that information by sending a request to the person indicated below. SDLCA reserves the right not to change any Personal Information but will append any alternative text the individual concerned believes appropriate. An individual may also request that SDLCA delete an individual's Personal Information from SDLCA's system and records. However, due to technical constraints and the fact that SDLCA backs up its systems, Personal Information may continue to reside in SDLCA's systems after deletion. Individuals, therefore, should not expect that their Personal Information would be completely removed from SDLCA's systems in response to an accepted request for deletion.

SDLCA reserves the right to decline access to Personal Information where the information requested:

- a) Would disclose the Personal Information of another individual or of a deceased individual;
- b) Could reasonably result in:
 - i) serious harm to the treatment or recovery of the individual concerned;
 - ii) serious emotional harm to the individual or another individual; or
 - iii) serious bodily harm to another individual;
- c) May harm or interfere with law enforcement activities and other investigative or regulatory functions of a body authorized by statute to perform such functions;
- d) Is not readily retrievable and the burden or cost of providing would be disproportionate to the nature or value of the information; or
- e) Does not exist, is not held, or cannot be found by SDLCA.

Where information will not or cannot be disclosed, the individual making the request will be provided with the reasons for non-disclosure. Where information will be disclosed, SDLCA will endeavour to provide the information in question within a reasonable time and no later than thirty (30) days following the request.

SDLCA will not respond to repetitious or vexatious requests for access. In determining whether a request is repetitious or vexatious, SDLCA will consider such factors as the frequency with

which information is updated, the purpose for which the information is used, and the nature of the information.

To guard against fraudulent requests for access, SDLCA will require sufficient information to allow it to confirm the identity of the person making the request before granting access or making corrections.

Amendment of SDLCA practices and this Policy

This statement is in effect and was last revised as of **June 7th 2016**. SDLCA will from time to time review and revise its privacy practices and this Policy. In the event of any amendment, an appropriate notice will be posted on this website. Policy changes will apply to the information collected from the date of posting of the revised Policy to SDLCA's website as well as to existing information held by SDLCA.

Questions

If You have any questions about the privacy practices of SDLCA, or You wish to access Your Personal Information, please contact:

Name

Salerno (Devil's) Lake Cottage Association

Email:

sdca.president@gmail.com

Address

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