

## Privacy Policy

The Jewish Camp Council of Toronto (“**JCC**”, “**we**” or “**us**”), the non-profit corporation that operates Camp Northland B’nai Brith (the “**Camp**”), is committed to maintaining the privacy of the personal information in its custody. We have created this Privacy Policy in order to fully explain how it is that we collect, use and disclose personal information.

### Definitions

For the purposes of this Privacy Policy:

“**Financial Information**” denotes personally identifiable information pertaining to a person/family’s finances, including, but not limited to, credit card numbers, assets, financial history, and income.

“**Personal Information**” is personally identifiable information about a person, such as name, address, email address, birth date and gender, and includes Financial Information.

### Collection

We collect Personal Information through a variety of means, including:

- Camper applications and registrations,
- Staff applications and employment,
- Our website (currently [www.CampNBB.com](http://www.CampNBB.com)) (the “**JCC Website**”),
- Newsletter communications (offline and online),
- Fundraising initiatives,
- Contests, and
- Other contact points with alumni, staff, campers and their parents.

When you voluntarily provide the JCC with Personal Information about yourself or a minor in your custody, either directly or through a third party source that has advised you of an intention to disclose that information to us (for example, a third party who you have authorized to communicate with us on your behalf) you thereby consent to the collection, use and disclosure thereof by the JCC in accordance with this Privacy Policy, subject to any uses and disclosures from which you have opted out.

### Uses

The JCC uses Personal Information (as applicable) for the following purposes:

- (a) To provide you (or a minor in your custody, in the case of parents/legal guardians of campers) with the goods, services and programs that you have requested from us (together, the “**Requested Services**”) and to communicate with you/the child in respect of the Requested Services (including, for example, invoicing or to provide information about departures);
- (b) Unless you request otherwise, to provide you with JCC and Camp-related information and marketing materials that may be of interest to you including, for example, notices of reunions, events and/or fundraising initiatives;
- (c) Unless you request otherwise, to provide you with information and marketing materials in respect of our corporate partners, supporters and/or sponsors, including, for example, special offers, promotions and event news in respect of same;
- (d) If you enter a contest or other promotion offered by the JCC, to administer the contest or promotion, in accordance with its rules and applicable laws; and
- (e) To satisfy other reasonable, legitimate business interests (such as collecting outstanding debts).

## **Disclosures**

The JCC will only disclose your Personal Information (or that of a minor in your custody) to third parties and/or affiliates:

- (a) Where you have specifically given us your consent to do so for one or more specified purposes;
- (b) Who are acting on our behalf as agents, suppliers or service providers and are required to maintain the confidentiality of the information disclosed. Notwithstanding the generality of the foregoing, the JCC will strictly limit any disclosure of Financial Information pursuant to this subsection (b) to those circumstances where it is necessary to process payment, or to permit the assessment of one of more camper or staff applications and/or applications for financial assistance;
- (c) As part of a corporate reorganization, merger, sale or amalgamation with another entity, or a sale of all or substantially all of the JCC's assets. Personal Information will be among the business assets transferred in these circumstances; and
- (d) To investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of any JCC policies, and/or as otherwise permitted or required by law.

## **Security**

The security of your Personal Information and Financial Information is important to the JCC. We instruct our employees with access to your Personal Information and Financial Information that it is to be used only in adherence with the principles set forth in this Privacy Policy and applicable laws. The JCC, its members, officers, directors, employees and/or contractors assume no liability for interception, alteration or misuse of information transmitted over the Internet.

## **Application of Privacy Policy to Minors**

The JCC recognizes the importance of protecting minors. For this reason, if you provide the JCC with any Personal Information in respect of a minor (under the age of 18) over whom you have legal custody, the JCC will treat such information in accordance with this Privacy Policy. By providing Personal Information to the JCC in respect of a minor in your legal custody, you hereby expressly consent to its use and disclosure by us in accordance with this Privacy Policy, subject to any uses from which you have opted out.

## **Contact Us**

If you have questions or concerns about this Privacy Policy, or if you want to review your personal information, close your account with us and have us delete the personal information in it, or if you do not wish to receive communications from the JCC (on its own behalf or on behalf of third parties):

Jewish Camp Council of Toronto  
Privacy Administrator  
1118 Centre Street, Suite 202,  
Thornhill ON L4J 7R9  
Phone: 905-881-0018

Or send an e-mail to [privacy@campnbb.com](mailto:privacy@campnbb.com).

## **Notification of Changes**

If we decide to make a material change to this Privacy Policy, we will either (i) post a notification and link on the homepage of the JCC Website so that you can review the updated policy, (ii) send you the change by e-mail, or (iii) send you the change by lettermail.

If at any point we wish to use your Personal Information (or that of your child) in a manner different from that stated at the time it was collected, we will notify you by one of the means listed above and give you the opportunity to indicate whether you consent to the proposed use.