

UMN Privacy Policy Aligned with PIPEDA's Ten Privacy Principles

Introduction

Underground Miata Network Association, Inc., UMN, (herein referred to as “the Club”) is a not-for-profit legal entity incorporated under the authority and laws of the province of Ontario. Our organization unites Miata/MX-5 automobile enthusiasts in the National Capital Region, and surrounding areas, fostering camaraderie and celebrating the joy of driving. As a membership-based auto fan club, UMN collects personal information from its members to maintain records, verify identity, organize events, and share perks such as discounts or promotional merchandise provided in partnership with sponsors.

Respect for privacy and data security are important Club values. That respect is embedded in Club practices as we aim not only to comply with Canadian regulations, including the *Personal Information Protection and Electronic Documents Act* (PIPEDA), but to honor the trust our members.

UMN recognizes that non-profits operate in a less structured legal environment, however, they are not categorically exempt from Canadian privacy law. While most member-based club activities—such as organizing driving tours, collecting membership records, and issuing newsletters—fall outside what PIPEDA considers “commercial activity,” certain sponsor relations or merchandise offers may engage commercial attributes and trigger the law’s applicability. Therefore, this policy voluntarily aligns with the ten PIPEDA Fair Information Principles, applying best practices to all personal information handling activities, regardless of whether legally mandated in every circumstance.

It should also be noted that UMN is a member-based organization, there are no employees, thus the onus for compliance and adherence to these principles is the responsibility of each and every member. **Members are responsible for informing the ‘de facto’ Privacy Officer of any contraventions, no one specific person is responsible to ‘police’ social platforms for policy compliance.** For example, if you do not want to be photographed at UMN events, please let your fellow members know in advance. If you see photos of yourself on the UMN website that you would like removed please notify the UMN Secretary, who will review your request.

This document details UMN’s privacy practices according to each of PIPEDA’s ten principles. It serves as our public statement of commitment, a basis for member trust, and an operational guide for the Club’s executive and members.

Summary Table – PIPEDA Principles and UMN Practices

PIPEDA Principle	UMN Compliance Practice
Accountability	UMN Secretary is the ‘de facto’ Privacy Officer; maintains compliance and records; staff education/awareness; handles complaints; ensures internal privacy standards.
Identifying Purposes	Purposes for collection—membership management, communication, event administration, fulfillment of sponsor offers—clearly stated at or before collection.
Consent	Consent obtained for all collections, uses, notices, and opt-outs; explicit consent where required, with options to withdraw at any time.
Limiting Collection	Only collects data (name, address, phone, email, vehicle description, images) required for club functions and club statistics; never collects excess information.
Limiting Use, Disclosure, Retention	Uses/discloses data only for stated purposes or as required by law; retention time is limited to as long as needed; guidelines for erasure and anonymization.
Accuracy	Members may update their records; regular reviews; data used for decision-making is maintained as accurate and current as reasonably possible.
Safeguards	Physical, organizational, and technological security (locks, passwords, restricted access, staff training, secure disposal) appropriate to sensitivity.
Openness	Privacy policy is publicly accessible; procedures and contacts are visible; information about the policy can be obtained on request.
Individual Access	Members can request access to their data; corrections or erasure promptly actioned unless prohibited by law; appeals/complaints handled transparently.
Challenging Compliance	Procedures exist for handling complaints; responses addressed by the UMN Secretary (‘de facto’ Privacy Officer); remedies include updating practice if warranted.

This table summarizes the application of PIPEDA’s core tenets within UMN. Subsequent sections provide full context, detailed policies, and analytical justification.

Principle 1: Accountability

UMN, through its membership, is responsible for all personal information under its custody, including any data processed or stored (e.g., email platforms, statistical analysis tools). The UMN Secretary serves as the ‘de facto’ Privacy Officer, accountable for compliance with these privacy principles, and where warranted, the development and execution of privacy programs, staff education/awareness, and responding to member inquiries or complaints.

The ‘de facto’ Privacy Officer’s responsibilities include:

- Maintaining an updated inventory of personal information holdings and their purposes
- Conducting periodic reviews and privacy impact assessments to identify, assess, and mitigate privacy risks
- Overseeing education and privacy awareness for all members, and others with access to member data
- Managing and documenting responses to privacy breaches, and ensuring prompt notification to potentially affected members in appropriate cases

UMN’s accountability is supported by maintaining written policies, accessible documentation (including this Privacy Policy), and enabling members to easily contact the ‘de facto’ Privacy Officer via email or Club correspondence channels (see “Openness” below).

Analysis:

Accountability forms the backbone of privacy management. Without a designated official empowered to enforce privacy standards and conduct regular reviews, no organization can credibly claim to protect data. In Canada, even if an entity is “not-for-profit,” it is not immune from privacy best practices or potential commercial overlap triggering PIPEDA compliance. The clear assignment of responsibility to the UMN Secretary, with delegated duties to other members as required, ensures continuity and seriousness in privacy governance.

Principle 2: Identifying Purposes

The purposes for which UMN collects personal information are clearly identified before or at the time of collection, either in writing (membership forms, online registration, event invitations) or orally at Club meetings or events. These purposes include:

- Maintaining up-to-date membership records and facilitating member communications (notices, newsletters, event details, renewal reminders, urgent updates)
- Verifying member identity and status to access Club resources or participate in events
- Administering Club activities, including tour coordination and event registration
- Sharing group demographic or vehicle summary statistics with sponsors or partners for the purpose of negotiating member benefits, without disclosing individual identities unless explicitly consented

- Publishing photographs/videos from Club events on accessible websites, Club newsletters, and social media, with prior notification and opt-out options

The Club does **not** collect financial details (such as banking or credit card numbers), as all financial transactions (e.g., membership dues or merchandise purchases) are directly handled through regulated financial institutions and payment processors.

When new purposes arise, UMN will identify and inform members of those purposes before using or disclosing their personal information and will obtain additional consent where required by law or best practice.

Analysis:

Identifying purposes at the point of collection enables members to make informed decisions and aligns with the core of PIPEDA's transparency requirements. Overly broad purposes are avoided, and new uses always prompt renewed member notification and consent. UMN's practice reflects the approach endorsed by the Office of the Privacy Commissioner: members always know why data is being collected, by whom, and for what reason.

Principle 3: Consent

UMN requires the knowledge and consent of members for the collection, use, or disclosure of their personal information, except where, exempted by law (e.g., where consent is not required for health or safety emergencies, or legal obligations).

How UMN obtains consent:

- Consent is typically obtained in writing at the time of membership application or online registration, usually via checkboxes confirming understanding and agreement with this Privacy Policy for digital forms, or signed member forms for physical applications.
- Implied consent is relied upon for routine administrative communications relevant to Club activities (e.g., event notices, renewal invitations), but all communications are subject to opt-out provisions, at the request of the member.
- Members should be aware that at any club event photographs and videos may be taken and may be published or shared for Club purposes. Advance notice and opt-out options are provided wherever reasonable.
- Members may withdraw consent at any time by contacting the UMN Secretary, subject to legal and operational limitations (e.g., ongoing obligations or records required by the law).

Special cases: When photographs or videos are taken at Club events, members are sometimes notified through visible signage or event announcements that their continued participation constitutes consent to be photographed or filmed for non-commercial Club uses (websites, newsletters, or social media). However, members should always be aware that photos and videos are possible. For example, driving tours and other sponsored UMN events, often attract the attention of the public who capture photos or videos that are outside our control. Opt-out requests

will be respected where possible, and reasonable efforts are made to accommodate those who do not wish their image to be used whenever practical.

Analysis:

PIPEDA's focus on meaningful consent requires that individuals clearly understand what they are agreeing to. UMN's preference for written and digital records, opt-in forms, and visible disclosures about cameras at events reinforce that consent is never passive or opaque. Consistent with expert guidance for Canadian non-profits, best practice is to use plain language, log consent, and offer clear paths to withdraw it at any time.

Principle 4: Limiting Collection

UMN collects only that personal information which is necessary for the explicitly stated, legitimate purposes described above. Collection is always by fair and lawful means, never through misrepresentation or covert means.

Specifically, UMN collects:

- Member name
- Residential or mailing address
- Telephone numbers
- Email address
- Vehicle make, model, year, and colour (for member statistics and event eligibility; also, for possible eligibility for sponsor discounts)
- Images (photographs and videos) taken at Club events, but only with notification and intended strictly for organizational sharing or Club marketing
- Records of member participation in Club events and roles held (for volunteer administration and recognition)

UMN never collects information simply out of curiosity or for future, undefined objectives. Sensitive data such as social insurance numbers, driver's licenses, or health data are not collected. Financial information is neither solicited nor retained.

Analysis:

By minimizing the data collected, UMN reduces risks of breach, lowers the cost of compliance, and builds trust through restraint. This principle aligns not only with PIPEDA, but also with contemporary security best practices, especially for not-for-profit entities that may have limited IT resources.

Principle 5: Limiting Use, Disclosure, and Retention

UMN uses or discloses personal data only for the purposes for which it was originally collected. Use or disclosure for any new purpose requires new consent from the member. The Club never sells, leases, or trades its member lists. Any sharing with sponsors is strictly controlled, explicitly disclosed, and limited to members who have opted in for such benefits.

Retention:

- Member records are retained only as long as necessary to fulfill membership management or legal recordkeeping duties or as otherwise legally mandated.
- Once a member leaves UMN, their non-essential data is securely deleted, anonymized, or destroyed, unless retention is legally required for up to six years (as per corporate statutes).
- Photographs and videos are used for organizational marketing or archival purposes. Any member may request the removal or anonymization of their image from Club publications wherever feasible.

Procedures:

- Regularly review data holdings to ensure irrelevance or redundancy does not persist
- Follow secure disposal protocols for electronic and paper data (shredding, erasure, de-indexing from websites)
- Institute maximum and minimum retention periods, clearly communicated to all members and volunteers

Analysis:

Retention reviews, destruction guidelines, and limitations on sharing are crucial to prevent privacy breaches and comply with Canadian law. Even if UMN is not strictly governed by every element of PIPEDA in all activities, following these limitations reflects a best-in-class data stewardship approach advocated for all non-profits and associations, especially where sponsor relationships are involved.

Principle 6: Accuracy

UMN ensures that personal information held about its members is kept as accurate, complete, and up-to-date as necessary for the purposes for which it is used.

Procedures:

- Provide members with access to their records and encourage them to review and correct data at least annually or upon renewal of membership
- Update records promptly when notifications of a change are received from the member

Decisions made regarding member participation, sponsorship eligibility, or communication preferences are always based on the most recent available data, minimizing the risk of unwanted contacts or exclusion from benefits.

Analysis:

Accurate records foster trust, ensure only desired communications are sent, and prevent errors in event or merchandise eligibility. PIPEDA's aim is to ensure organizations do not maintain data out of negligence or inertia; regular review cycles and correction opportunities keep UMN's data fit for purpose.

Principle 7: Safeguards

UMN maintains security safeguards appropriate to the sensitivity of the data:

- **Physical:** Locked or restricted access to storage and secure destruction of hard copies
- **Organizational:** Limitation of access to member data strictly on a “need to know” basis among members and volunteers
- **Technological:** Secure passwords and/or access for electronic records

Analysis:

The security of member information is not only about technical controls but a culture of vigilance. UMN's multifaceted approach integrates physical, technological, and organizational layers, each reinforcing the others. Non-profits can be targets of data theft, phishing, or human error; layered safeguards and regular training reflect national standards and the best advice for clubs and associations in Canada.

Principle 8: Openness

UMN is committed to transparency about its privacy practices. The full Privacy Policy is posted on the Club's website, highlighted at in-person sign-up events, and available upon request. The name and contact information of the 'de facto' Privacy Officer (UMN Secretary) are prominently displayed on all data collection forms, the website, and in club newsletters. Anyone—member or non-member—can request information on:

- What data is collected
- How it is used and with whom it is shared
- The procedures for individual access or complaint
- The Club's data retention, destruction, and security safeguards

Members will refer all privacy-related inquiries to the UMN Secretary and to provide access to this policy or additional guidance as needed.

Analysis:

Openness fosters trust and pre-empts confusion or suspicion. By making this policy accessible and keeping staff alert to member rights and expectations, UMN aligns with both PIPEDA requirements and the expectations of modern Canadian non-profits. Widely distributing privacy statements and access information reinforces the Club's commitment.

Principle 9: Individual Access

Upon written request, any member may review, update, or correct the personal information held by UMN. Requests should be addressed to the 'de facto' Privacy Officer (UMN Secretary), who will respond within 30 days, unless a longer period is justified by the scope of the request or legal complexity, in which case the member will be notified of the expected timeline.

Process:

- UMN will provide members with details of all personal information held, and its uses to whom it has been disclosed (as precisely as possible).
- Members may submit corrections, and substantiated requests will be promptly reflected in the records; if personal information was previously shared with sponsors or partners, those parties will be notified of the correction if practical.

Keep in mind the limited nature of the information collected by UMN. In exceptional circumstances, certain exceptions apply, including information containing references to other individuals without their consent, information that is solicitor-client privileged, or information collected in the course of an investigation as required by law.

Analysis:

Individual access is essential not only for transparency but for correcting errors. Timely access, clarity around process and exceptions, and affirmation of the right to challenge ensure compliance and are hallmarks of a mature privacy program in any membership-based club.

Principle 10: Challenging Compliance

UMN provides clear procedures for individuals to challenge the Club's compliance with any of the ten privacy principles. Complaints, inquiries, or concerns about the policy or practice can be filed with the 'de facto' Privacy Officer (Secretary), whose contact details are provided in all communications and on the Club website.

All complaints are:

- Acknowledged promptly (within five business days of receipt)
- Investigated by the Secretary or a designate with adequate authority
- Responded to in writing, including findings, reasoning, and any corrective action to be taken, typically within 30 days

If a complaint is justified, UMN will take steps to correct practices, update records, and, if warranted, inform affected members.

Analysis:

Complaints are not only a legal right but a valuable tool for continuous improvement and developing member trust. UMN's procedures are modeled on best practice guidelines for Canadian non-profits, facilitating internal remediation and, if necessary, escalation to appropriate authorities.

Special Provisions: Photos & Videos at UMN Events

UMN is proud to document and celebrate Club events. As noted above, images captured during club-sponsored gatherings may be used in newsletters, on the Club website, or on social media. These uses are typically publicized in advance through signage or event programs, and members may opt out of inclusion (for example, by informing a photographer or a club member) whenever possible. These procedures are in line with both PIPEDA guidance regarding images and the common practices of Canadian clubs and associations.

Personal Use:

Members may also take photographs or videos for non-commercial personal use at events. Any sharing of such materials outside of Club circles is expected to be respectful and in line with Club values, and must never be conducted for commercial gain without securing express consent from anyone depicted.

Contact Information for Privacy Inquiries or Complaints**UMN 'de facto' Privacy Officer (Club Secretary)**

- Tony Pickett
 - Email: umn.secretary@gmail.com
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Amendments and Policy Updates

UMN reserves the right to update this Privacy Policy to reflect changes in Canadian law or Club activities. Whenever material changes are made, members will be notified via email and/or announcement on the Club website, and consents will be refreshed if new purposes arise. The most current version will be available online.

Policy Review and Education/Awareness

The UMN Secretary will review this Policy annually and whenever Club practices or technologies change, reporting findings to the Board and issuing revised policies as required. All members and

volunteers handling member data will be retrained at least annually and upon the issuance of significant policy changes.

Conclusion

UMN's commitment to privacy reflects not only compliance obligations but a culture of trust, openness, and shared responsibility. Voluntary alignment with PIPEDA ensures respect for our members' autonomy, supports collaborative sponsorship relations, and prevents privacy risks inherent to any modern organization. Members with questions, requests, or concerns are encouraged to contact the Secretary at any time.

Notice to Members:

By joining UMN, participating in events, or using our services, you acknowledge that you have read, understood, and agree to the collection, use, and disclosure of your personal information in accordance with this Privacy Policy, and to the receipt of member communications subject to your opt-out rights.

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