

## PUBLIC COMMUNICATIONS AND PRIVACY POLICY

Propeller Dance is committed to appropriately steward and dissipate information in Propeller Dance's custody or control while protecting the privacy of individuals' personal information in compliance with the *Personal Information Protection and Electronic Documents Act* (PIPEDA).

Propeller Dance affirms the importance of conducting its operations in ways that are intended to protect the privacy rights of its participants, employees, volunteers and board members.

In accordance with PIPEDA, Propeller Dance may collect, use or disclose personal information only for purposes that a reasonable person would consider appropriate in the circumstances and in compliance with PIPEDA.

### **Key Definitions for this section**

#### *Personal Information Protection and Electronic Documents Act (PIPEDA)*

The main principle of PIPEDA is to establish, in an era in which technology increasingly facilitates the circulation and exchange of information, rules to govern the collection, use and disclosure of personal information in a manner that recognizes the right to privacy for individuals with respect to their personal information and the need for organizations to collect, use or disclose personal information for purposes that a reasonable person would consider appropriate in the circumstances.

#### *Record*

Information in Propeller Dance's custody or control relating to Propeller Dance employees, volunteers, artists, or dancers, or to Propeller Dance's business operations and the administration of programs and services. Information may be recorded in printed form, on film, by electronic means or otherwise and includes:

- Correspondence, memoranda, books, plans, maps, drawings, diagrams, pictorial or graphic works, photographs, film, microfilm, sound recordings, videotapes, machine-readable records, and other documentary material, regardless of physical form or characteristics, and any copy thereof
- Any information that is capable of being produced from a machine-readable record under Propeller Dance's control by means of computer hardware and software or any other information storage equipment and technical expertise normally used by Propeller Dance, or to which Propeller Dance can reasonably gain access
- Emails, including additional/forwarded copies.

#### *Personal information*

Information about an identifiable individual, including:

- Race, national or ethnic origin, religion, age, sex, sexual orientation, and marital or family status
- Employment and educational history

- Medical, psychiatric and psychological history, prognosis, condition, treatment and evaluation
- Any identifying number (Social Insurance Number, student number), symbol or other assigned particular
- Home address and telephone number
- Personal opinions of or about the individual
- Name, where it appears with or reveals one's personal information
- Correspondence sent to Propeller Dance by an individual that is implicitly or explicitly of a private or confidential nature and any reply to that correspondence that would reveal its contents.

Note: Information about individuals acting in their business or professional capacity is not personal information. This includes their name, title, work address (including office location), work telephone number and Propeller Dance email address.

#### *Privacy breach*

An unauthorized collection, use, or disclosure of someone's personal information, in contravention of PIPEDA. The breach may affect an individual or a group.

#### **Disclosure**

Propeller Dance will ensure that personal information about an identifiable individual which is not in the public domain will not be disclosed without their knowledge and consent.

It is expected Propeller Dance may be asked to provide commentary and promotional content to the media or the public. Before sharing any information, all employees, company members, volunteers, students and interns must obtain authorization from the Director(s) to maintain consistent messaging and branding of Propeller Dance.

Propeller Dance is normally represented to the media and the public by the Director(s) and/or the Board Chair, except in cases where this role has been assigned. That being said, Propeller Dance recognizes the fact that all of our employees, company members, volunteers and Board of Directors also represent Propeller Dance whenever they either self-identify or are identified with Propeller Dance. Propeller Dance requires all formal or informal representation to avoid the use or disclosure of anyone's personal information and to be on point with Propeller Dance's philosophy and guiding principles.