CALGARY STAMPEDE FOUNDATION CORPORATE POLICY			
Department	Administration	**Number**	CSF-CP-008
Subject	Privacy	**First Issued**	April 25, 2019
		Effective	June 24, 2025
Issued to	All Foundation representatives, donors and sponsors	**Version**	03
Approved by	Board of Directors	**Next Review**	June 24, 2027

1.0 POLICY STATEMENT

Calgary Stampede Foundation (the "Foundation"), is committed to maintaining the accuracy, confidentiality and security of the personal information that is in the organization's custody, or under the organization's control. This Privacy Policy describes how the Foundation may collect, use and disclose personal information and provides additional information regarding the privacy practices of the Foundation.

2.0 POLICY RATIONALE

The Foundation has adopted a Privacy policy and privacy practices in order to be compliant with applicable privacy legislation (including Alberta's *Personal Information Protection Act*) and to demonstrate the organization's longstanding commitment to responsible business practices. Privacy legislation in Canada varies between jurisdictions, and between Canada and other countries. Consequently, all of the rights and obligations contained in this Privacy policy may not be available to all individuals or in all jurisdictions.

3.0 SCOPE

This Privacy Policy applies to all Foundation representatives. It governs the collection, use and disclosure of the personal information of Foundation representatives with whom the organization interacts in the course of business.

4.0 POLICY DEFINITIONS

Foundation Representative: includes Foundation directors, officers, management, employees, volunteers, any third-party organizations or individuals providing services under contract on the behalf of the Foundation with respect to those services and persons other than guests who organize and operate and oversee Foundation programs and activities. Program participants defined as any person enrolled as a member or student in Foundation or Foundation led youth programs or activities may also be considered Foundation representatives.

Management team: refers to all management level employees reporting directly to the Executive Director, as well as the Controller, Foundation.

Guest: refers to individuals who are not representatives of the Foundation attending functions and/or using facilities on Stampede Park.

Personal employee information: means personal information reasonably required for the purposes of establishing, managing or terminating an employment relationship or managing a post-employment relationship between the Foundation and that individual and can include, without limitation, an individual's name, home address, telephone number, personal email address, date of birth, employee identification number, social insurance number and skills information (such as professional designations, occupation, qualifications, languages spoken, training,

experience and education).

Personal Information: any information about an identifiable individual, other than the person's business title and/or contact information when used or for the purpose of business communications.

Personal Volunteer Information: means personal information reasonably required for, managing or terminating a volunteer-work relationship or managing a post-volunteer-work relationship between the Foundation and that individual and can include, without limitation, an individual's name, home address, telephone number, personal email address, date of birth, volunteer identification number and skills information (such as professional designations, occupation, qualifications, languages spoken, training, experience and education).

Foundation Supporters and Prospective Supporters: refers to donors and sponsors as well as prospective donors and sponsors.

5.0 POLICY DETAILS

COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

5.1 How the Foundation Collects Personal Information

5.1.1 The Foundation collects different types of personal information, in respect of individual donors, grantors and Foundation representatives and others with whom the organization interacts.

5.1.2 The Foundation will obtain consent for the collection of personal information where necessary and may collect personal information without knowledge or consent where permitted to or required by applicable laws or regulatory requirements.

5.1.3 The personal information that is collected, depending on the nature of an individual's relationship with the Foundation, may include, but is not limited to:

i) contact and identification information, such as name, address, telephone number, e-mail address, date of birth and gender, employment, social insurance number and volunteer or donor history; and
ii) financial information, such as donor history and payment methods (such as cheque, credit card or debit card information) and banking information.
iii) Identification information;
iv) Resumes and/or applications;
v) References and interview notes;
vi) Photographs and videos;
vii) Volunteer information sheets;
viii) Offer letters and employment contracts;
ix) Payroll information forms, including, social insurance number and pay cheque deposit information;
x) Wage and benefit information;

xi) Uniform and safety equipment information forms;
xii) Parking authorization information forms;
xiii) Expense reimbursement forms;
xiv) Medical services forms, including information related to the medical services that are sought or obtained from the Foundation's medical services provider;
xv) Forms relating to the application for, or changes to, employee health and welfare benefits, including short and long term disability, life insurance, optional life insurance, accidental death and dismemberment, medical and dental care;
xvi) Beneficiary and emergency contact information;
xvii) Product and service-related information concerning the products and services that the organization provides to, or receives from an individual;
xviii) Financial information, such as payment methods (credit card or debit card information), credit history (where an individual wishes to obtain credit from the Foundation) and/or direct deposit or banking information (so that the organization can pay for the products and services obtained from an individual); and,
xix) Relationship information, including information related to agreements, preferences, advisors and decision-makers, feedback and information requested by or provided to an individual.
xx) Background information, including information obtained through criminal record and vulnerable sector checks.

5.1.4 The Foundation values the opinions and suggestions of the individuals with whom the organization interacts. The Foundation may collect market-related information, which may include personal information, concerning market trends and activities impacting Foundation businesses and operations.

5.1.5 The Foundation may also collect information, which may include personal information, related to our media and public relations activities and information related to our interactions with our Foundation representatives, prospective donors and members of the community.

5.1.6 The Foundation collects personal information directly when an individual enters into a contract with the Foundation, makes a donation thereto or participates in or supports one of the Foundation's programs or activities. In most circumstances where the personal information that the Foundation collects is held by a third party, the Foundation will obtain permission before seeking out this information from such sources (note that such permission may be given directly, or it may be implied from an individual's

actions as further discussed below).

5.1.7 From time to time, the Foundation may work with, or utilize the services of, third parties and may also receive personal information collected by those third parties in the course of the relationship with such third parties, or the performance of their services for, us or otherwise. Where this is the case, the Foundation will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose personal information to us.

5.1.8 Where permitted or required by applicable law or regulatory requirements, the Foundation may collect information about an individual without knowledge or consent.

5.2 How the Foundation Uses Personal Information

5.2.1 The Foundation collects personal information to enable us to manage, maintain, and develop our activities and operations

5.2.2 The Foundation will obtain consent for the use of personal information where necessary and may use personal information without knowledge or consent where permitted to or required by applicable laws or regulatory requirements.

5.2.3 Personal information may be used to:

i) establish, maintain and manage our relationship with individuals so that the Foundation may provide opportunities to participate in and to support our programs and activities;
ii) be able to review donor history with the Foundation;
iii) be able to review how an individual accesses and participates in the Foundation's programs and activities as well as those of the Calgary Exhibition and Stampede Limited ("CES");
iv) enable us to comply with applicable law or regulatory process, including the Canada Revenue Agency requirements of a registered charity;
v) be able to comply with individual requests (for example, if an individual prefers to be contacted at a business or residential telephone number and advise us of that preference, the Foundation will use this information to contact as directed); and
vi) any other reasonable purpose where consent has been obtained.
vii) determine eligibility for initial employment or volunteer functions, including the verification of references and qualifications;

viii) administer pay and benefits;
ix) process work-related claims;
x) establish training and/or development requirements;
xi) conduct performance reviews and determine performance requirements;
xii) assess qualifications for a particular job or task;
xiii) consider promotions or changes in jobs;
xiv) recognize outstanding service to the Foundation;
xv) establish a contact point in the event of an emergency;
xvi) comply with applicable labour or employment statutes;
xvii) compile directories and telephone lists;
xviii) provide the medical services that are sought or obtained from the Foundation's medical services provider;
xix) provide uniforms and safety equipment;
xx) administer parking privileges;
xxi) process expense reimbursement requests;
xxii) advise of opportunities for employment or volunteer assistance;
xxiii) share information about the Foundation, including the organizations committees, events, activities and meetings;
xxiv) advise of fundraising campaigns, goals and opportunities to donate;
xxv) ensure the security of the Foundation's information;
xxvi) establish, maintain and manage the Foundation's relationship with individuals so that the organization may provide, or receive, the products and services that have been requested;
xxvii) protect the Foundation against error, fraud, theft and damage to Foundation goods and property;
xxviii) enable the organization to undertake environmental, and health and safety activities, including incident planning, response and investigation

5.2.4 Personal information may also be collected, used, or disclosed in the course of an individual's participation in some or all of the programs that the Foundation may offer from time to time.

5.2.5 The Foundation will not sell, rent or give away personal information to third parties for the purpose of allowing others to solicit donations or to otherwise market their products or services to an individual.

5.3 How the Foundation Discloses Personal Information

The Foundation may collect, use and disclose personal information:
i) for the purposes described in this Privacy Policy;
ii) as permitted or required by applicable law or regulatory requirements;
iii) for any additional purposes where the Foundation has advised and, where consent is required by law, consent has been obtained.

5.3.1 The Foundation may, in all circumstances, use and disclose personal information without knowledge or consent where permitted or required by applicable law or regulatory requirements to do so.

5.3.2 Personal information may be shared with Foundation employees, affiliates, shareholders, volunteers, contractors, consultants and other parties who require such information to assist us with managing our relationship with and carrying out our activities, including: third parties that provide services to us or on our behalf and third parties that assist the Foundation in the provision of services and third parties whose services the Foundation uses to conduct our business. For example, personal information may be shared, from time to time, with third party information technology, data processing, accounting, human resources and marketing services providers or partners, including the CES so that we may carry out Foundation activities.

5.3.3 The Foundation may disclose personal information collected:

i) as permitted or required by applicable law or regulatory requirements;
ii) to comply with valid legal processes such as search warrants, subpoenas or court orders;
iii) during emergency situations or where necessary to protect the safety of a person or group of persons;
iv) where the personal information is publicly available; or
v) with an individual’s consent.
vi) as part of the Foundation's recognition of its employees or volunteers in its various publications and other communications, such as the annual report;
vii) to protect the rights and property of the Foundation;
viii) in conjunction with an individual’s participation in some or all of the programs that the Foundation may offer;
ix) to the CES, who may use such information in creating event guest lists.

5.3.4 The Foundation retains personal information only as long as is reasonable to fulfil the purposes for which the personal information was collected or for legal or business purposes. The Foundation renders personal information non-identifying or destroys records containing personal information when the organization no longer needs the personal information.

SECURITY, CONSENT AND ACCESS

5.4 Security and Monitoring

5.4.1 The work product of the Foundation’s employees and volunteers, whether in paper record, computer files, or in any other storage

format, belongs to the Foundation. Accordingly, such work product, whether it is stored electronically, on paper or in any other format, and the tools used to generate that work product, are always subject to review and monitoring by the Foundation.

5.4.2 The Foundation has the capability to monitor all employees' computer and e-mail use.

5.4.3 In the course of conducting business, the Foundation may monitor the activities of individuals in respect to Foundation operations and property. For example, some locations are equipped with surveillance cameras. These cameras are generally in high-risk areas or entrances to Park facilities. Where in use, surveillance cameras are there for the protection of employees, volunteers and third parties, and to protect against theft, vandalism and damage to Foundation goods and property. Generally, recorded images are routinely destroyed and not shared with third parties unless there is suspicion of a crime, in which case they may be turned over to the police or other appropriate government agency or authority.

5.4.4 Surveillance undertaken is not meant to suggest that all individuals will in fact be monitored or their actions subject to surveillance. It is meant to highlight that such monitoring may occur and may result in the collection of personal information from individuals.

5.4.5 When using Foundation equipment or resources, employees and volunteers should not have any expectation of privacy with respect to their use of such equipment or resources.

5.4.6 The Foundation endeavours to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to protect personal information from loss and unauthorized access, copying, use, modification or disclosure. The Foundation uses appropriate security measures when destroying personal information, including shredding paper records and permanently deleting electronic records.

5.4.7 The Foundation will notify the Office of the Information and Privacy Commissioner of Alberta, without delay, of a security breach affecting personal information if it creates a real risk of significant harm to individuals.

5.4.8 The Foundation retains personal information only as long as is reasonable to fulfil the purposes for which the personal information was collected or for legal or business purposes. The Foundation renders personal information non-identifying or destroys records containing personal information when the organization no longer needs the personal information.

5.5 Notification and Consent

5.5.1 Alberta's Personal Information Protection Act contains provisions that deal specifically with personal employee information. The Foundation is not required to obtain the consent of an individual for the collection, use or disclosure of personal employee information and/or personal volunteer information provided that:
i) The information is used solely for the purposes of establishing, managing or terminating an individual's employment or volunteer relationship or managing a postemployment or post-volunteer-work relationship between an individual and the Foundation;
ii) It is reasonable to collect, use or disclose the information for the particular purpose for which it is being collected, used or disclosed; and,
iii) In the case of an individual who is a current employee or volunteer of the Foundation the Foundation has provided the individual with reasonable notification that Personal Employee Information and/or Personal Volunteer Information about the individual is going to be collected, used and disclosed and of the purposes for which the information is going to be collected, used or disclosed.

5.5.2 For personal information, Personal Employee Information and Personal Volunteer Information, different types of consent may be obtained. Depending on the sensitivity of the personal information, an individual's consent may be express, implied or deemed (using an opt-out mechanism) in accordance with the requirements of applicable privacy legislation.

5.5.3 Express consent can be given orally, electronically or in writing

5.5.4 Typically, the Foundation will seek consent at the time that the organization collects an individual's personal information. In certain circumstances, consent may be obtained after collection but prior to Foundation use or disclosure of an individual's personal information.

5.5.5 If the Foundation plans to use or disclose an individual's personal information for a purpose not previously identified (either in this Privacy policy or separately), the Foundation will endeavor to advise the individual of that purpose before such use or disclosure. Unless advised otherwise, the Foundation will assume an individual has consented to the collection, use and disclosure of his/her personal information as explained in this Privacy Policy.

5.5.6 Opt-Out

i) An individual may change or withdraw their consent at any time, subject to legal or contractual obligations and

reasonable notice, by contacting the Foundation's Operations Manager.

ii) All communications with respect to such withdrawal or variation of consent should be in writing and addressed to Operations Manager/Privacy Officer.

iii) If an individual chooses to withdraw their consent to the use and disclosure of their personal information, the Foundation may not be able to provide the individual with certain products and services if the organization does not have the necessary personal information to do so.

5.6 Updating Personal Information

5.6.1 It is important that the personal information contained in Foundation records is both accurate and current. The Foundation will make a reasonable effort to ensure that any personal information collected, used or disclosed by the organization is accurate and complete to the extent that is reasonable for the organization's purposes in collecting, using or disclosing that personal information. If personal information happens to change during the course of an individual's relationship with the Foundation, it is the responsibility of the individual to inform to Foundation of such changes.

5.6.2 In some circumstances, the Foundation may not agree with a request to change personal information and will instead annotate the personal information under the organization's control with the correction that was requested but not made.

5.7 Accessing Personal Information

5.7.1 An individual may ask to see their personal information. To review, verify or correct personal information, individuals must contact the Operations Manager/Privacy Officer. Any such request must be in writing and include sufficient detail to enable the Foundation, with a reasonable effort, to identify any record in Foundation custody or under Foundation control containing the personal information in respect of which the request is made.

5.7.2 When requesting access to personal information, the Foundation may request specific information from an individual to enable the Foundation to confirm the individual's identity and right to access, as well as to search for and provide the individual with the requested personal information. The Foundation may also charge an individual a fee to access personal information or for information about the use or disclosure of the individual's personal information.

5.7.3 An individual's right to access the personal information that is held by the Foundation about them is not absolute. There are instances where applicable laws or regulatory requirements allow or require the Foundation to refuse to provide some or all of the personal information that is held about an individual. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with record retention obligations and practices.

5.7.4 In the event that access to an individual's personal information cannot be provided, the Foundation will endeavour to inform the individual of the reason(s) why, subject to any legal or regulatory restrictions.

SERVICE PROVIDERS OUTSIDE OF CANADA

5.8 Use of Service Providers Outside of Canada

5.8.1 The Foundation uses service providers outside Canada to collect, use, disclose or store personal information for or on behalf of the Foundation.

5.8.2 Collection, use, disclosure or storage is occurring or may occur in the United States of America and is subject to their laws.

5.8.3 The purposes for which the service provider outside of Canada has been authorized to collect, use, disclose or store personal information for or on behalf of the Foundation includes all functions relating to the maintenance and enhancement of the Foundation's data system.

5.8.4 The Foundation will notify an individual before or at the time of collecting or transferring their personal information to a service provider outside of Canada of the way in which the individual may obtain access to written information about the Foundation's policies and practices with respect to service providers outside of Canada. Further information regarding the Foundation's use of service providers outside of Canada can be obtained by contacting the Foundation's privacy officer.

GENERAL

5.9 Inquiries and Concerns

5.9.1 Questions about this Privacy policy or concerns about how the Foundation manages personal information can be directed to the Operations manager/Privacy officer by telephone, in writing or by e-mail. The privacy officer will endeavor to answer questions and advise of any steps taken to address the issues raised. If

dissatisfied with the response, an individual may be entitled to make a written submission to the Privacy Commissioner in the appropriate jurisdiction.

5.10 Privacy Officer

5.10.1 The Foundation has appointed a privacy officer to oversee compliance with this Privacy policy. The contact information for the Foundation privacy officer is as follows:

Operations Manager/Privacy Officer
1410 Stampede Trail SE
Calgary, Alberta T2G 2W1

Phone: (403) 261-9130
E-mail: rfulbrook@calgarystampede.com
Fax: (403) 265-7197

5.11 Interpretation of this Privacy Policy

5.11.1 Any interpretation associated with this Privacy policy will be made by the privacy officer. This Privacy policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word "including" is used, it shall mean "including without limitation".

5.11.2 This Privacy policy does not create or confer upon any individual any rights, or impose upon the Foundation or obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy policy and Canada's federal and provincial privacy laws, as applicable, this Privacy policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.

5.12 Revisions to this Privacy Policy

5.12.1 From time to time, changes may be made to this Privacy policy to reflect changes in its legal or regulatory obligations or in the manner in which personal information is dealt with. Revised versions of the Privacy policy will be posted on our website.

6.0 RESPONSIBILITY FOR POLICY ADMINISTRATION

The Management team has responsibility for maintaining this policy. All inquiries regarding the privacy policy should be directed to the privacy officer.

7.0 REFERENCES

CSF-CP-007 Code of Conduct
Alberta's Personal Information Protection Act

8.0 RESCIND DETAIL

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