

Original Policy Passed: August 24, 2015
Effective as of: August 24, 2015
Last Reviewed or Revised: January 3, 2017

Background

The Massage Therapy Association of Manitoba (“MTAM”), as a professional voluntary organization, is committed to enhancing the interests of its diverse membership.

Consistent with these objectives and its mandate, the MTAM is dedicated to maintaining high standards of confidentiality with respect to the information that has been provided to us. This Privacy Policy & Personal Information (“Policy”) has been prepared to affirm our commitment to maintaining the privacy of our Members and others, and to inform of our practices concerning the collection, use and disclosure of Personal Information provided to the MTAM.

For the purposes of this policy, “Member” means an individual who has been accepted for membership in the MTAM or who seeks to become a member of the MTAM, or has been a Member of the MTAM in the past. Our obligations apply to all officers, employees, contractors and agents who provide services to or on behalf of the MTAM for delivery of products, services and information to our Members.

In the event of questions about: (i) access to your Personal Information; (ii) our collection, use, management or disclosure of Personal Information; or (iii) this Policy; please contact, the Administrator of the MTAM at info@mtam.mb.ca

What is Personal Information?

We consider “Personal Information” to mean any information, recorded in any form, about an identified individual or an individual whose identity may be inferred or determined from such information, other than business contact information (e.g. name, title, business address, telephone and fax numbers and e-mail address).

Why the MTAM May Collect Personal Information

The MTAM collects information provided in writing (including via electronic media) or verbally about Members, and does so to fulfill the objectives and mandate of the Association, which involves:

- To advance and protect the interests of Manitoba-based massage therapists;
- To foster harmonious relations among our Members;
- To encourage a high standard of education, training, and ethics;
- To uphold the honour and dignity of the profession of the massage therapy
- To circulate among our Members information on all matters affecting the profession; and

- To print, publish, issue and circulate such papers, periodicals, magazines, books, circulars and other literary undertakings as may seem conducive to any of the above objectives.

How the MTAM Uses Personal Information

The MTAM only collects, uses and discloses Personal Information for purposes that would be considered reasonable in the circumstances and only such information as is required for the purposes of providing products, services or information to our Members. We use only fair and lawful methods to collect Personal Information. Our use of Personal Information is limited to the purposes described in this Policy.

When the MTAM May Disclose Your Personal Information

As a rule, all information concerning a Member is held in strict confidence and, except in limited circumstances, is not revealed to anyone unless expressly or implicitly authorized by the Member.

The MTAM does lease the name, address, telephone number and e-mail address of Members to affiliated organizations, preferred suppliers, and other reputable organizations when:

- In the opinion of the MTAM, such usage constitutes a service and information pertinent to the members of the MTAM, and
- The MTAM has the written agreement of such organizations to adhere to specific requirements with respect to their use of such information.

Where the MTAM discloses Personal Information to organizations that perform services on its behalf, we will require those service providers to use such information solely for the purposes of providing services to the person concerned or the MTAM and to have appropriate safeguards for the protection of that Personal Information.

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

- Where required by law or by order or requirement of a court, administrative agency or other governmental tribunal;
- Where the MTAM believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety or property of an identifiable person or group;
- Where it is necessary to establish or collect fees;
- Where it is necessary to permit the MTAM to pursue available remedies or limit any damages that the MTAM may sustain; or
- Where the information is public.

Where obliged or permitted to disclose information without consent, the MTAM will not disclose more information than is required.

Consent

Unless permitted by law, no Personal Information is collected, without first obtaining the consent of the individual concerned to the collection, use and dissemination of that information. However, we may seek consent to use and disclose Personal Information after it has been collected in those cases where the MTAM wishes to use the information for a purpose not identified in this Policy or not previously identified or for which the individual concerned has not previously consented.

If a Member consents, his/her personal information shall be used for the purposes indicated in this policy statement. If a member does not consent, then his/her personal information shall be used by the MTAM for purposes of communicating with the Member only and shall not be provided to anyone else (e.g. Preferred Suppliers). In the event a Member does not indicate his/her consent, the submission of the information constitutes the consent of an applicant to the use of his or her personal information for these purposes.

If a Member wishes to withdraw his/her consent to have his/her MTAM membership information disclosed to affiliated organizations, preferred suppliers and other reputable organizations, the Member should contact the MTAM.

The Accuracy and Retention of Personal Information

The MTAM endeavors to ensure that any Personal Information provided by its Members, and in its possession, is as accurate, current and complete as necessary for the purposes for which the MTAM uses that information. If we become aware that Personal Information is inaccurate, incomplete or out of date, the MTAM will revise the Personal Information and, if necessary, use its best efforts to inform third parties which were provided with inaccurate information so that those third parties may also correct their records. Information about a former member is not actively maintained and, for so long as it is held by the MTAM, the MTAM cannot assure the accuracy of such information.

We keep your Personal Information only as long as it is required for the reasons it was collected. This period may extend beyond the end of a Member's relationship with the MTAM but only for so long as it is necessary for us to communicate with a former member, or to have sufficient information to respond to any issues that may arise at a later date. Currently, the principal place in which the MTAM holds Personal Information is at the MTAM Office in the City of Winnipeg.

Protection of Personal Information

The MTAM endeavours to maintain appropriate physical, procedural and technical security with respect to its offices and information storage facilities to prevent any loss, misuse, unauthorized access, disclosure, or modification of Personal Information. This also applies to our disposal or destruction of Personal Information.

The MTAM further protects Personal Information by restricting access to personal information to those employees that the management of the MTAM has determined need to know that information in order that we may provide our products, services or information.

If any employee of the MTAM misuses Personal Information, this will be considered as a serious offence for which disciplinary action may be taken, up to and including termination of employment.

If any individual or organization misuses Personal Information – provided for the purpose of giving services to or for MTAM – this will be considered a serious issue for which action may be taken, up to and including termination of any agreement between the MTAM and that individual or organization.

Access to Your Personal Information

The MTAM permits the reasonable right of access and review of Personal Information held by the MTAM about a Member and will endeavor to provide the information in question within a reasonable time and no later than 30 days following the request. Where information will not or cannot be disclosed, the individual making the request will be provided with the reasons for non-disclosure. Further information concerning the MTAM's access policy and procedures may be obtained by contacting our Administrator.

The MTAM will not charge a Member for verifying or correcting his/her Personal Information.

Visiting the MTAM's Web Site(s)

A visitor to the MTAM's web site (www.mtam.mb.ca and www.messageforlife.ca) is not required to reveal any individually identifiable information, such as name, address, or telephone number. Nor is such information collected passively by electronic means. In order to access and use the Members-only portions of the site, members will need to provide certain Personal Information. Such personal information will only be used for providing services and information to Members.

Information is collected when an individual voluntarily completes an on-line membership application form or completes an online survey. This information is collected, used or disclosed in a manner consistent with this policy statement. E-mail addresses are also collected during the on-line

PRIVACY & PERSONAL INFORMATION

*Massage Therapy
Association of Manitoba*

Policy

membership application process but applicants may indicate that they do not wish to receive any unsolicited electronic communication.

Our web server **does not** collect visitor information in the form of the visitor's domain or Internet Protocol (IP) address but does collect information regarding which pages are being accessed. This information is used internally, only in aggregate form, to better serve visitors by helping us to

- Manage our web sites;
- Diagnose any technical problems; and
- Improve the content of our web site.

Following its use, the information collected is not retained but, is discarded in a secure manner.

Evolving Practices

The MTAM will from time to time review and revise its privacy practices and this Policy. In the event of any amendment, a notice will be posted on www.mtam.mb.ca and published in appropriate MTAM publications. Policy changes will apply to the information collected from the date of posting to the MTAM's web site, www.mtam.mb.ca, as well as to existing information held by the MTAM.