

# Tourism Calgary's Privacy Policy

## Commitment to Privacy

Updated: July 20, 2020

You can also access our privacy policy at [visitcalgary.com](http://visitcalgary.com)

Protecting your privacy and the confidentiality of your personal information is fundamental to the way we conduct our business at Tourism Calgary. This Privacy Policy adheres to the principles of the *Personal Information Protection and Electronic Documents Act (Canada)* and substantially similar provincial privacy legislation, including *Alberta Personal Information Protection Act (PIPA)*.

### Scope of Privacy Policy

This Privacy Policy sets out the principles which Tourism Calgary - Calgary Convention & Visitor's Bureau ("Tourism Calgary", "us", "our" or "we") observes regarding the collection, use and disclosure of personal information about any identifiable person, including Tourism Calgary's members, and members of the public who use Tourism Calgary's services and facilities, but excluding Tourism Calgary's employees and volunteers.

The Policy also applies to information collected offline through our call centres, direct marketing campaigns, surveys, sweepstakes and competitions, on premise, and through any other interactions you may have with us. This Privacy Policy is incorporated into and forms part of the terms of service or use of any website or software application or service operated or provided by Tourism Calgary (collectively, "Services" and each is a "Service").

By using a Service or otherwise providing us with your personal information, you are accepting the practices described in this Privacy Policy, as they may be amended by us from time to time, and agreeing to our collection and use of your personal information in accordance with this Privacy Policy.

This Policy covers the following:

- What is Personal Information?
- What Personal Information do we collect?
- How do we collect your Personal Information?
- Cookies and tracking technologies
- How do we use your Personal Information?
- How do we share your Personal Information?
- How long do we retain your Personal Information?
- Cross Border Transfer of Personal Information
- How do we protect your Personal Information?
- How can you access or correct any inaccuracies in your Personal Information?
- Your choices with respect to the collection, use and disclosure of your Personal Information
- Links to other websites

- Resolving your privacy concerns
- Changes to this Privacy Policy

The following is a short summary of the key elements of this Policy. You can read the full version of the Policy (add jump link to below policy) following the summary.

## **SUMMARY**

### **We may collect the following Personal Information:**

*When you contact us via our website:*

- name, email address, company;
- subject matter of your inquiry;
- other information that you may choose to share with us in your message.

*When you use our website:*

The following usage information may be collected automatically through the use of analytics tools ([Google Analytics](#), [Siteimprove](#)) and third-party ad serving networks in order to better understand our target audience and to improve the quality of our Services:

- information about your browser, network and device;
- demographic information that is stored in your browser, if permitted in your settings;
- information about the webpages you visited prior to coming to our website;
- network location and IP address.

### **We may use your Personal Information for the following purposes:**

- to provide you with our products or Services, and the use of our website;
- to respond to your inquiries;
- to provide a better user experience with respect to the use of our website;
- to better understand our target audience and to continue improving the quality of our products, Services and website;
- to communicate with you about our products and Services, including updates or newsletters, or to deliver content that may be of interest to you;
- to ensure that our website remains functioning and secure;
- to investigate, prevent or act on any illegal activities or violations of our Terms of Service.

**We may share your Personal Information with our trusted service providers who we engage to provide services to us including advertising, marketing and analytics; hosted web platform, IT services and other functions required to deliver the Services.**

### **You have the following choices:**

Depending on the products, Services or your use of our website, your choices may include the following:

- **Cookies Settings and Preferences.** You may disable cookies and other tracking technologies through the settings in your browser. While doing so may negatively affect your experience with the use of our website, it will not prevent us from transacting with you.
- **E-mail Settings and Preferences.** You may sign up for our mailing lists in order to receive promotional and other materials that may be of interest to you. If you no longer wish to receive marketing e-mails from us, you may choose to unsubscribe at any time by clicking on the "unsubscribe" link in our emails or by contacting us at [privacy@tourismcalgary.com](mailto:privacy@tourismcalgary.com).
- **Opt-Outs.** You may contact us to opt out of the use or sharing of your personal information for secondary purposes such as marketing.
- **Analytics Tools.** You may opt out of the use of your personal information for analytics purposes. Google provides an opt out browser extension for your use: <https://support.google.com/analytics/answer/181881?hl=en>

### **How to contact us:**

For more information about this Policy, our privacy practices or to obtain access to or correction of your Personal Information, please contact our Privacy Officer at [privacy@tourismcalgary.com](mailto:privacy@tourismcalgary.com).

## **PRIVACY POLICY**

### **What is Personal Information?**

"Personal Information" means any information, recorded in any form, about an identified individual or an individual whose identity may be inferred or determined from such information. This typically includes information such as your name, address, screen name, profile picture, email address, telephone number, ID numbers, and may also include other information such as IP address, browsing habits, preferences and information about your lifestyle or preferences such as your hobbies and interests. "Personal Information" may or may not include business contact information, depending on the jurisdiction.

### ***Anonymized data***

This Policy does not apply to anonymized or aggregated data from which the identity of an individual cannot be determined. Where permitted by law, we retain the right to use business contact information and anonymized/aggregated data in any way that we determine appropriate.

### **What personal information do we collect?**

We may collect the following types of personal information when you contact us or complete the Contact Form on our website:

- name, email address, company;
- subject matter of your inquiry;
- information that you may choose to share with us in your message.

### ***Automatic Collection***

Our website is configured to automatically collect, through the use of analytics tools ([Google Analytics](#) and [Siteimprove](#)) and third-party ad serving networks, the following types of usage information in order to better understand our target audience and to improve the quality of our products, services and website:

- information about your browser, network and device;
- demographic information that is stored in your browser, if permitted in your settings;
- information about the webpages you visited prior to coming to our website;
- network location and IP address.

## **How do we collect your Personal Information?**

Tourism Calgary only collects Personal Information for purposes that would be considered reasonable in the circumstances and only such information as is required for the purposes of providing our products, Services or website. We use only fair and lawful methods to collect Personal Information.

### **(i) Consent**

Unless permitted by law, no Personal Information is collected, without first obtaining the consent of the individual concerned to the collection, use and disclosure of that information, which may be express or implied by your provision of the information to us with knowledge as to the purposes for how it will be used. In addition, we may seek consent to use and disclose Personal Information after it has been collected in those cases where we wish to use the information for a new or different purpose where you have not already consented to such a use of your personal information.

### **(ii) Withdrawing your consent**

In most cases and subject to legal and contractual restrictions, you are free to refuse or withdraw your consent at any time upon reasonable, advance notice. Your withdrawal of consent will not operate retroactively. It should be noted that in certain circumstances, our products or Services can only be offered if you provide us with your Personal Information. Consequently, if you choose not provide us with the required Personal Information, we may not be able to offer you these products or Services. We will inform you of the consequences of the withdrawal of consent.

## **Cookies and tracking technologies**

Tourism Calgary websites create cookies, which are saved in your browser whenever you visit. "Cookies" are small data packets that we save on your computer to allow us to understand your visit to our site. It does not, however, tell us anything about you, unless you specifically provide us personal information via forms or surveys. This is used by Tourism Calgary to measure your use of our website and our site's performance. "We create and save a "persistent" cookie in your browser to allow us to personalize your experience on our website, as well as including targeted offers and advertisements for you in our marketing campaigns. Cookies also allow us to report on an aggregated basis on the effectiveness of our advertisements at inspiring tourists to travel to Calgary and provide us with statistics on visitors of Calgary.

In order to do so, cookies collect the IP address of your devices, which provides your general location data. Our service provider may combine your IP address with other

information that our service provider has obtained from other sources, as permitted by law. You do not need to have cookies turned on to visit our website. You may also withdraw your consent to storage of cookies at any time by changing your cookie settings on your browser.

You can also learn more about cookies by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org), which includes additional useful information on cookies and how to block cookies using different types of browsers. Note that while disabling cookies may negatively affect your user experience on our websites, it will not prevent us from transacting with you.

## **How do we use your Personal Information?**

We use the information we collect for the following purposes:

- to provide you with our products, Services and website;
- to respond to your inquiries;
- to provide a better user experience with respect to the use of our website;
- to better understand our target audience and to continue improving the quality of our products, marketing, Services and website;
- to communicate with you about our products and Services, including updates or newsletters, or to deliver content that may be of interest to you;
- to ensure that our website remains functioning and secure;
- to investigate, prevent or act on any illegal activities or violations of our Terms of Service;
- to generate aggregated or anonymized information that we may use and disclose in our discretion
- Otherwise as permitted or required by applicable law.

When you supply information about yourself for a specific purpose, we use the information for only that purpose (such as to provide the Service or information you have requested). For example, you may be asked to give us individual information to receive information. We may store your personal information and comments for future use and reference in order to maintain an appropriate record of our relationship with you.

As explained at **"How do we share your Personal Information?" below**, Tourism Calgary engages third party service providers to help maintain efficient operations and improve delivery to the user. Because such service providers may access our systems, such service providers may have access to your information.

Tourism Calgary does not transfer or relinquish ownership of information maintained about you within Tourism Calgary systems and databases to such service providers but requires these service providers to sign confidentiality agreements to keep all confidential information and other proprietary information found in our systems confidential.

Our use of Personal Information is limited to the purposes described in this Policy. We do not otherwise sell, trade, barter, exchange or disclose for consideration any Personal Information we have obtained.

## **Personal Information of Persons under 18**

If you are under 18, be sure to obtain your parent's or guardian's permission before you send any information about yourself (your name, address, e-mail address, etc.) to us or

anyone else over the Internet. We encourage parents to get involved with their children's online usage and to be aware of the activities in which they are participating.

## **How do we share your Personal Information?**

### **Disclosure of Personal Information**

We may share your Personal Information individuals or organizations who are our trusted service providers including but not limited to our creative agencies, media purchasing/managing agencies, research agencies, as well as ad serving networks and media providers that we work with, as well as hosting providers such as Google Analytics, Amazon Web Services, Acquia and Liquidweb, and other external suppliers including individuals or organizations who are, or may be, involved in maintaining, reviewing and developing our systems, procedures and infrastructure including testing or upgrading of our computer systems.

When we contract with such third party service providers to provide support services required for the provision of our products, Services or website, we will require those third parties to use such information solely for the purposes of providing services to us or our clients, and to have appropriate safeguards for the protection of that Personal Information.

Tourism Calgary reserves the right to share general demographic information with advertisers or potential advertisers; however, profiles of individual users are not shared.

Please note that there are circumstances where the use and/or disclosure of Personal Information may be required or permitted without consent. Such circumstances may include:

- (a) Where required by law or by order or requirement of a court, administrative agency or governmental tribunal;
- (b) Where Tourism Calgary believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety or property of an identifiable person or group;
- (c) Where it is necessary to permit us to pursue available remedies or limit any damages that we may sustain;
- (d) Where the information is public as permitted by law;
- (e) Where it is reasonable for the purposes of investigating a breach of an agreement, or actual or suspected illegal activity; or
- (f) Where it is necessary for the purpose of a prospective business transaction if the information is necessary to determine whether to proceed with the transaction or to complete the transaction, or a completed business transaction where the information is necessary to carry on the activity that was the object of the transaction.

Where required or permitted to disclose your personal information without consent, we will not disclose more information than is required.

## **How long do we retain your Personal Information?**

We keep your Personal Information only as long as it is required for the reasons it was collected. The length of time we retain information varies, depending on the purpose for

which it was collected and the nature of the information. This period may extend beyond the end of your relationship with us but it will be only for so long as it is necessary for us to have sufficient information to respond to any issues that may arise at a later date.

When your Personal Information is no longer required for the purposes for which it was collected, we will destroy, delete, erase or convert it into an anonymous form.

### **Cross Border Transfer of Information**

We may transfer personal information to a service provider which is located outside of Canada or process or stores personal information outside of Canada, in jurisdictions where privacy laws may offer different levels of protection from those in Canada. Your Personal Information may also be subject to access by and disclosure to law enforcement agencies under the applicable foreign legislation.. By using our products, the Services, or otherwise providing information to us, you consent to the transfer of your personal information to countries outside of Canada.

### **How do we protect your Personal Information?**

We endeavour to maintain appropriate physical, organizational and technical security with respect to its offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of Personal Information. This also applies to our disposal or destruction of Personal Information. We further protect Personal Information by restricting access to it to those employees that require access to the information in order to provide our products, services or website.

### **How can you access or correct any inaccuracies in your Personal Information?**

We endeavor to ensure that any Personal Information provided and in its possession is as accurate, current and complete as necessary for the purposes for which we use that information. If we become aware that Personal Information is inaccurate, incomplete or out of date, we will revise the Personal Information and, if necessary, use its best efforts to inform third party service providers or contractors which were provided with inaccurate information so that those third parties may also correct their records.

We permit the reasonable right of access and review of Personal Information held by us about an individual and will endeavour to provide the information in question within a reasonable time, generally no later than 30 days following the request. To guard against fraudulent requests for access, we may require sufficient information to allow us to confirm that the person making the request is authorized to do so before granting access or making corrections.

### **Your choices with respect to the collection, use and disclosure of your Personal Information**

Depending on the products, Services or your use of our website, your choices may include the following:

- **Cookies Settings and Preferences.** You may disable cookies and other tracking technologies through the settings in your browser. While doing so may negatively affect your experience with the use of our website, it will not prevent us from

transacting with you. Please refer to the “Cookie” section for more information on your choices.

- **E-mail Settings and Preferences.** You may sign up for our mailing lists in order to receive promotional and other materials that may be of interest to you. If you no longer wish to receive marketing e-mails from us, you may choose to unsubscribe at any time by clicking on the “unsubscribe” link in our emails or by contacting us at [atprivacy@tourismcalgary.com](mailto:atprivacy@tourismcalgary.com).
- **Opt-Outs.** You may contact us to opt out of the use or sharing of your personal information, including for secondary marketing purposes.

### **Links to Other Websites**

We may provide links to, or automatically produce search results for, third-party websites or resources, or third-party information referencing or linking to third-party websites or resources. This privacy policy applies to Services offered by Tourism Calgary at the domain (web address) [www.visitcalgary.com](http://www.visitcalgary.com) and other sites and Services offered by Tourism Calgary. Linked sites are governed by their own privacy policies and practices and users are encouraged to take the time to familiarize themselves with the privacy policies and policies of these websites, for which Tourism Calgary is not responsible.

We cannot and do not guarantee, represent or warrant that the content or information contained in such third-party websites and resources is accurate, legal, non-infringing or inoffensive. We do not endorse the content or information of any third-party website or resource and, further do not warrant that such websites or resources will not contain viruses or other malicious code or will not otherwise affect your computer. By using our website to search for or link to a third-party website, you agree and understand that we are not responsible or liable, directly or indirectly, for any damages or losses caused or alleged to be caused by or in connection with your use of, or reliance on, Tourism Calgary to obtain search results or to link to a third-party website.

### **Resolving your privacy concerns**

If you have questions or concerns about this Privacy Policy or any of Tourism Calgary’s use of your information, please contact Tourism Calgary at the following:

Local: 403-263-8510

Toll-free: 1-800-661-1678

E-mail: [privacy@tourismcalgary.com](mailto:privacy@tourismcalgary.com)

### **Changes to this Privacy Policy**

We will update this policy from time to time if our practices change or if the law requires changes to it. We will post any Privacy Policy changes on this page, and, if the changes are significant, we will provide a more prominent notice and a summary of the relevant changes at the top of the page. You should review this policy regularly for changes and can ascertain whether the Policy has been updated by checking the Effective Date indicated above. If you do not agree to the terms of this Privacy Policy or any other Tourism Calgary policy, agreement, or disclaimer, you should exit the site and cease use of all Tourism Calgary services immediately. Your continued use of the website and services following the posting of any changes to this Policy means you agree to be bound by the terms of this Policy.