



## **smOdyssey, Inc. Confidential Information/Privacy Policy**

### **Purpose**

smOdyssey, Inc. (smO) is keenly aware that confidentiality is an important issue for many people within the BDSM community. Therefore, we strive to keep any information in the possession of the organization that can personally identify anyone within our community strictly private. We make personal information available only on a need to know basis or as required by law. This policy defines the information governed and the positions within smO that have access to such information.

smO is, a 501(c)7 corporation, and is run entirely by volunteers. The Board of Directors (BOD) has adopted this policy in regards to the protection of your personal information.

### **Definitions**

1. Personal and confidential information as defined in this policy shall include but is not limited to the following:

Real (legal) names, street addresses, zip or postal codes, telephone numbers, email addresses, website URLs, financial information of any kind, names of relatives or employers, membership in any other BDSM organization, or any other information provided in confidence by an individual to smO for any official purpose, including but not limited to applications for membership and class or event registrations.

2. The media by which confidential or personal information is given to smO may include but is not limited to, verbal, written (hardcopy) email, or via a form on a website.
3. Confidential information includes information given to smOdyssey via a third party such as an organization that assists smO with event registrations.

### **Policy Terms**

1. Due to our 501(c)7 status, state and federal laws require that all members of the BOD may have access to corporate membership records. Active BOD members are not automatically granted access. However, they may request information and access cannot be withheld for any reason.
2. Federal Agents (e.g. the FBI and Homeland Security) can invoke the Patriot Act to compel us to show our records without a warrant and prohibit us from telling you that they did so.

3. Any local, state or federal government agency that supplies a court order could be granted access to the organizational records of smOdyssey, Inc. smO will comply with the law, should we receive such a request.
4. Appointment to the following positions automatically includes board approval to access any personal information necessary to carry out the assigned duties and responsibilities of the position.
  - a. Membership Chair(s) - The membership chair(s) maintains personal files for all individuals who submit membership applications, including current and past members as required by California State Law.
  - b. Membership Committee - Members of the membership committee may hear or see personal information belonging to current members or applicants.
  - c. Treasurer's Committee –This committee may have access to information including legal names and addresses, billing information, etc. as required to process payments and finalize registrations.
  - d. Planning Committees
    - i. Small Events (total Income is \$10K or less)
      - 1) The Event Coordinator shall have access to the registration records which could contain personal information.
    - ii. Large Events (total income is greater than \$10K)
      - 1) The Event Coordinator shall have access to the registration records which could contain personal information.
      - 2) The Registration Lead(s) shall have access to the entire registration system.
      - 3) The event Treasurer shall have access to the entire registration system.
      - 4) The Volunteer Coordinator shall be granted limited access to registration system reports.
      - 5) The Hotel coordinator shall be granted limited access to registration system reports to ensure that smO receives credit for all registrants staying at the hotel.
      - 6) ID Checkers shall have access to some or all registration records during their shift, as it is their job to compare your ID to the information in our records. Volunteers for these positions must be approved by the Registration Lead.
    - iii. The Elections Coordinator requires access to members' legal names and addresses to mail the notice of annual meeting as required by law.
5. smOdyssey, Inc. can make no guarantee that the staff from any outside vendor used for registration purposes will not have access to the personal information in our registration system.
6. From time to time, members of smOdyssey may be granted temporary limited access to some member personal information, as required to perform their duties as a volunteer. Any access to the personal information of members not described in

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Paragraph 4 above, must be pre-approved by the BOD and will be supervised by an smOdyssey Officer or the Chair of the Membership Committee.

## **Policy Violations**

It is a violation of this policy to disclose or distribute personal information as defined herein, and is subject to the smO Grievance Policy.

Any violation shall be reported to the individual(s) whose information was disclosed or distributed. The individual(s) shall be told what personal information was disclosed, who disclosed it, and to whom the information was given. The individual(s) shall also be told that the disclosure is a violation of this policy and that violations of this policy are subject to the smO grievance policy.

The Membership Chair or an Officer designated by the President is responsible to make this notification within 72 hours of discovery of the violation. This report shall not be deemed a violation of this policy.

Violations of this policy are subject to the smO grievance policy. At the request of the non-member whose personal information was disclosed, the President or the Membership Chair may file a grievance on behalf of the non-member.