



## British Columbia Yukon Section Skate Canada Policies and Procedures

### 3.9 Privacy Policy

#### 3.9.1

#### Purpose of the Policy

1. Privacy of personal information is governed by the *Personal Information Protection and Electronics Documents Act* ("PIPEDA"). This policy describes the way that Skate Canada British Columbia/Yukon collects, uses, retains safeguards, discloses and disposes of personal information, and states Skate Canada British Columbia/Yukon's commitment to collecting, using and disclosing personal information responsibly. This policy is based on the standards required by PIPEDA, and Skate Canada British Columbia/Yukon's interpretation of these responsibilities.

#### 3.9.3

#### Purpose

Personal information will only be collected by Skate Canada British Columbia/Yukon to meet and maintain the highest standard of organizing and programming the sport of Figure Skating. Skate Canada British Columbia/Yukon collects personal information from prospective members, members, coaches, officials, participants, team managers and volunteers for purposes that include, but are not limited to, the following:

- Name, address, phone number, cell phone number, fax number and e mail address for the purpose of communicating about Skate Canada British Columbia/Yukon's programs, events and activities.
- NCCP number, education, resumes and experience for database entry at the Coaching Association of Canada to determine level of certification and coaching qualifications. Skate Canada number to determine level of certification, coaching qualifications and registration confirmation
- Date of birth, athlete biography, and member club to

- determine eligibility, age group and appropriate level of play.
- Banking information, social insurance number, criminal records check, resume, and beneficiaries for Skate Canada British Columbia/Yukon's payroll, company insurance and health plan.
  - Criminal records check and related personal reference information for the purpose of implementing Skate Canada British Columbia/Yukon's volunteer screening program.
  - Personal health information including provincial health card numbers, allergies, emergency contact and past medical history for use in the case of medical emergency.
  - Athlete information including height, weight, feedback from coaches and trainers, performance results for athlete registration forms, outfitting uniforms, media relations, and various components of athlete and team selection.
  - Marketing information including attitudinal and demographic data on individual members to determine membership demographic structure, and program wants and needs.

Name, address, phone number, cell phone number, fax number and e-mail address for the purpose of providing insurance coverage, managing insurance claims and conducting insurance investigations.

If a purpose has not been identified herein, Skate Canada British Columbia/Yukon will seek consent from individuals when personal information is used for a purpose not already consented to. This consent will be documented as to when and how it was received.

### **3.9.4**

#### **Consent**

Consent is required to be obtained by lawful means from individuals at the time of collection, prior to the use or disclosure of the personal information. If the consent to the collection, use or disclosure was not obtained upon receipt of the information, consent will be obtained prior to the use or disclosure of that information. Skate Canada British Columbia/Yukon may collect personal information without consent where reasonable to do so and where permitted by law.

1. By providing personal information to Skate Canada British Columbia/Yukon, individuals are consenting to the use of the information for the purposes identified in this policy.
2. Skate Canada British Columbia/Yukon will not, as a condition of a product or service, require an individual to consent to the

collection, use or disclosure of information beyond that required to fulfill the specified purpose.

3. An individual may withdraw consent to the collection, use or disclosure of personal information at any time, subject to legal or contractual restrictions, provided the individual gives one week's notice of such withdrawal to Skate Canada British Columbia/Yukon.

### **3.9.5 Limiting Collection**

All personal information will be collected fairly, by lawful means and for the purposes as specified in this policy. SKATE CANADA BRITISH COLUMBIA/YUKON will not use any form of deception to obtain personal information.

### **3.9.6 Limiting Use, Disclosure or Retention**

1. Personal information will not be used or disclosed by SKATE CANADA BRITISH COLUMBIA/YUKON for purposes other than those for which it was collected as described herein, except with the consent of the individual or as required by law.
2. Personal information will be retained for certain periods of time in accordance with the following:
  - Registration data and athlete information will be retained for a period of three years after an individual has left a program of Skate Canada British Columbia/Yukon, in the event that the individual chooses to return to the program;
  - Parental/family information will be retained for a period of three years after an individual has left a program of Skate Canada British Columbia/Yukon, in the event that the individual chooses to return to the program;
  - Information collected by coaches will be retained for a period of three years after an individual has left a program of Skate Canada British Columbia/Yukon, in the event that the individual chooses to return to the program.
  - Employee information will be retained for a period of seven years in accordance with Canada Customs and Revenue Agency requirements.
  - Personal health information will be immediately destroyed when an individual chooses to leave a program of Skate Canada British Columbia/Yukon.

- Marketing information will be immediately destroyed upon compilation and analysis of collected information.
  - As otherwise may be stipulated in federal or provincial legislation.
  - Test records will be retained for a period of seven years from the date of the test.
3. Personal information that is used to make a decision about an individual will be maintained for a minimum of one year of time to allow the individual access to the information after the decision has been made.
  4. Skate Canada British Columbia/Yukon may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where Skate Canada British Columbia/Yukon has reasonable grounds to believe the information could be useful in the investigation of an unlawful activity, or to comply with a subpoena or warrant or an order made by the court or otherwise as permitted by applicable law.
  5. Documents will be destroyed by way of shredding and electronic files will be deleted in their entirety. When hardware is discarded, SKATE CANADA BRITISH COLUMBIA/YUKON will ensure that the hard drive is physically destroyed.

### **3.9.7**

#### **Accuracy**

Skate Canada British Columbia/Yukon will use accurate and up-to-date information as is necessary for the purposes for which it is to be used, to minimize the possibility that inappropriate information may be used to make a decision about an individual.

### **3.9.8**

#### **Safeguards**

1. Personal information is protected by security safeguards appropriate to the sensitivity of the information against loss or theft, unauthorized access, disclosure, copying, use or modification.
2. Methods of protection and safeguards include, but are not limited to, locked filing cabinets, need-to-know access and technological measures including the use of passwords, encryption and firewalls.
3. The following steps will be taken to ensure security:

- Staff and Board of Directors are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with this policy.
- External consultants and agencies with access to personal information will provide Skate Canada British Columbia/Yukon with appropriate privacy assurances

### **3.9.9 Openness**

Skate Canada British Columbia/Yukon will publicize information about its policies and practices relating to the management of personal information. This information is available through this policy, on Skate Canada British Columbia/Yukon's website.

### **3.9.10 Individual Access**

1. Upon written request, and with assistance from Skate Canada British Columbia/Yukon, an individual may be informed of the existence, use and disclosure of his or her personal information and will be given access to that information. As well, an individual is entitled to be informed of the source of the personal information along with an account of third parties to whom the information has been disclosed.
  2. Requested information will be disclosed to the individual within 30 days of receipt of the written request. All costs incurred to obtain the information will be the responsibility of the individual.
  3. If personal information is inaccurate or incomplete, it will be amended as required.
- An individual may be denied access to his or her personal information if:
    - The information contains references to other individuals;
    - The information cannot be disclosed for legal, security or commercial proprietary purposes;
    - The information is subject to solicitor-client or litigation privilege.
  - Upon refusal, Skate Canada British Columbia/Yukon will inform the individual the reasons for the refusal.

### 3.9.11

## Challenging Compliance

1. An individual may challenge Skate Canada British Columbia/Yukon's compliance with this policy and PIPEDA, by submitting a challenge in writing.
2. Upon receipt of a written complaint, Skate Canada British Columbia/Yukon will:
  - Record the date the complaint is received;
  - Notify the Privacy Officer who will serve in a neutral, unbiased capacity to resolve the complaint;
  - Acknowledge receipt of the complaint by way of telephone conversation and clarify the nature of the complaint within three days of receipt of the complaint;
  - Appoint an investigator using Skate Canada British Columbia/Yukon Board of Directors or an independent investigator, who will have the skills necessary to conduct a fair and impartial investigation, and who will have unfettered access to all files and personnel, within ten days of receipt of the complaint.
  - Upon completion of the investigation and within 25 days of receipt of the complaint, the investigator will submit a written report to Skate Canada British Columbia/Yukon.
  - Notify the complainant of the outcome of the investigation and any relevant steps taken to rectify the complaint, including any amendments to policies and procedures, within 30 days of receipt of the complaint.
  - An individual may appeal a decision made by Skate Canada British Columbia/Yukon under this Policy, in accordance with Skate Canada British Columbia/Yukon's policies for appeals.