

## PRIVACY POLICIES

Approved by VESC Executive on June 28<sup>th</sup>, 2018 and ratified by VESC members at the NEXT AGM (March 2019)

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### 4. Privacy Policies

- 4.1. Privacy of personal information is governed by the *Personal Information Protection and Electronics Documents Act* (“PIPEDA”). The Club’s collects, uses, retains, safeguards, discloses and disposes of personal information according to Skate Canada/Ontario, and follows Skate Canada/Ontario’s commitment to collecting, using and disclosing personal information responsibly. This policy is based on the standards required by PIPEDA, and Skate Canada/Ontario’s interpretation of these responsibilities.
- 4.2. The Club collects personal information from participants, coaches, officials, team managers, contractors, employees and volunteers (collectively “individuals”) for purposes that include but are not limited to the following:
  - 4.2.1. Registration for programs, activities and events; travel administration and purchasing equipment, and other products
  - 4.2.2. Receiving communications from the Club in regards to fundraising, programs, events, and activities.
  - 4.2.3. Determining eligibility, age group and appropriate level of play/competition.
  - 4.2.4. Criminal record checks and related personal reference material for implementing the Club’s and Skate Canada/Ontario screening policies.
  - 4.2.5. Fitness screening information as required through Ontario High Performance Sport Initiative activities and programs.
  - 4.2.6. Awards nominations, biographies, published articles and media relations.
  - 4.2.7. Outfitting uniforms and various components of athlete and team selection.
  - 4.2.8. Data to determine level of certification, coaching qualifications and coach selection.
  - 4.2.9. Credit card information for purchasing products and for registrations at events and activities.
  - 4.2.10. Technical monitoring, Club consultation, officials training, education, sport promotion, media publications and posting on Club’s website and Facebook page, live streaming platforms, even videos, event photographs, displays or posters.
  - 4.2.11. Scores and rankings of athletes for record keeping, publishing, competing, and identifying athletes.
  - 4.2.12. Names, ages, and signatures for the purpose of participant agreements, permission where medical treatment is concerned, and collection of waivers.
  - 4.2.13. Name and contact information for the purpose of communication within and between Board, Committees, volunteers, parents/guardians, coaches, etc.
  - 4.2.14. Emergency contacts, medical history for use in the case of classification, medical emergency or reports relating to medical or emergency issues and managing insurance claims.

#### 4.3. Consent

- 4.3.1. Consent is required to be obtained by lawful means from individuals at the time of collection, prior to the use and disclosure was not obtained receipt of the information, consent will be obtained prior to the use of disclose of that information. The Club may collect personal information without consent where reasonable to do so and where permitted by law.
- 4.3.2. By providing personal information to the Club, individuals are consenting to the use of information for the purposes identified in this policy.
- 4.3.3. In determining of the form of consent to use, the Club will take into account the sensitivity of the information.
- 4.3.4. The Club will not, as a condition of a product or service, require an individual to consent to the collection, use, and disclosure of information beyond that required to fulfill the specified purpose.
- 4.3.5. An individual may withdraw consent to the collection, use, or disclosure of personal information at any time, subject to legal or contractual restrictions, providing the individual gives one week of notice of such withdrawal to the Club. The President of the executive will advise the individual of the implications of such withdrawal.

#### 4.4. Limited Collected:

- 4.4.1. All personal information will be collected fairly, by lawful means, and for the purposes as specified in this policy. The Club will not use any form of deception to obtain personal information.

#### 4.5. Limiting use, Disclosure and Retention

- 4.5.1. Personal information will not be used or disclosed by the Club 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.
- 4.5.2. Information may be forwarded to volunteers of the organization (such as Committee Members, Board of Directors, Local Organizing Committees, and Competition Officials), other associations for the purpose of clinics, programming, and competition, Ontario Sections, Skate Ontario, Skate Canada, Coaches Association of Ontario, Award organizations, or other parties with whom the Club deals.
- 4.5.3. Information disclosed to a third party with consent from the individual shall be protected by a third party agreement to limit use and disclosure.
- 4.5.4. Personal information will be retained for certain periods of time in accordance with the following:
  - 4.5.4.1. Program registration data and athlete information will be retained indefinitely for the sake of historical record and tracking purposes.
  - 4.5.4.2. Registration data for programs, clinics, camps, competitions, may be retained indefinitely after the event for record purposes.
  - 4.5.4.3. Employee information will be retained for a period of seven years in Approved November 2015 17 of 34 accordance with Canada Customs and Revenue Canada requirements.

- 4.5.4.4. Personal health information will be immediately destroyed when an individual chooses to leave the Club's program.
- 4.5.4.5. Marketing information will be immediately destroyed upon compilation and analysis of collected information.
- 4.5.4.6. Credit Card information will be destroyed immediately upon completion of a financial transaction.
- 4.5.4.7. As otherwise may be stipulated in federal or provincial legislation.

#### 4.6. Coaches, Board of directors and Volunteers Commitment

Our coaches, volunteers and members of the executive are committed to respecting the personal information we hold in our files. All have been trained in the proper and respectful use of personal information. Volunteers, coaches etc. who receive personal information in order to carry out the work of the Club will be notified with regard to the safekeeping of such information.

#### 4.7 Accuracy

The Club 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.

#### 4.8 Security

All information held by us is subject to strict internal security to prevent unauthorized access and improper usage. Electronic records are subject to limited access by authorized personnel who must use passwords and other security measures. Print records containing personal information are subject to physical protection such as locked rooms or cabinets, accessible only to authorized personnel.

#### 4.9 Website

When you visit the Club's website, we take steps to respect and protect your privacy.

The Club's website is a product of the Club. The information on the website is provided as a resource to those interested in skating. The Club disclaims any representation, or warranty, express, or implied, concerning the accuracy, completeness or fitness for a particular purpose of the information. Persons accessing this information assume full responsibility for the use of the information and understand and agree that the Club is not liable for any claim, loss or damage arising from the use of this information. Reference to specific products, processes, or services does not constitute or imply recommendation or endorsement by the Club. The Club also reserves the right to make changes at any time without notice.

Links to other Internet sites made available through the Club's website are not under the control of the Club, and are provided for your convenience only. The Club, therefore does not guarantee these links and the material available on said sites, nor is the Club responsible for privacy practices by other organizations or websites.

#### 4.10 Contact us

Contact us If you have questions or comments about our policy or about the personal information we have about you, you may contact us and we will do our best to answer your questions. Our President can be reached at: [president.vesc@gmail.com](mailto:president.vesc@gmail.com).



If, having shared your concerns with us, you are still not satisfied you may file a complaint with:

**By mail:**

Information and Privacy Commissioner of Ontario  
2 Bloor Street East, Suite 1400  
Toronto, ON M4W 1A8

**By telephone:**

1.800.387.0073  
TTD/TTY: 416.325.7539.  
Fax: 416.325.9195

**By email:**

[info@ipc.on.ca](mailto:info@ipc.on.ca)

**THE VALLEY EAST SKATING CLUB**

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On the 28 day of June, 2018  
(day) (month) (year)

Signed:

Ron Rancourt, President

June 28<sup>th</sup>, 2018

Date

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