



Policy Category	Advocacy
Policy Name	CDMFA Privacy Policy
Source	CDMFA RPPs 2021
Date	2021, amendment 2024-03

## Privacy

### 1. **BACKGROUND AND PURPOSE OF THE PRIVACY POLICY**

- 1.1. The CDMFA recognizes the importance of, and is committed to, maintaining the accuracy, confidentiality, and security of personal information. Following the federal Personal Information Protection and Electronic Documents Act (PIPEDA), and Alberta Personal Information and Privacy Act (PIPA), the CDMFA developed this Privacy Policy.
- 1.2. The Personal Information Protection and Electronic Documents Act limits the collection, use, and disclosure of personal information: This Privacy Policy describes the manner in which CDMFA shall adhere to all relevant legislative privacy requirements, referencing the 10 Canadian Standards Association (CSA) principles.

### 2. **PERSONAL INFORMATION**

- 2.1. Personal information is defined as information about an identifiable individual. Personal information includes that which relates to personal characteristics (e.g., age, gender, home address, phone number, ethnic background), health e.g. health history, health conditions), or activities and views (e.g. religion, politics, opinions or evaluations). Personal information does not include business information (e.g. business address, business phone).

### 3. **SCOPE**

- 3.1. The CDMFA Privacy Policy sets out the principles and practices regarding the protection of personal information that is collected, used, or disclosed.

### 4. **PRINCIPLES**

- 4.1. **Accountability.** The CDMFA is responsible for personal information under its control. Furthermore, all CDMFA employees and volunteers who collect, maintain and/or use personal information are responsible for ensuring that the collection, use and disclosure of this information is carried out in accordance with this policy and relevant procedures. The CDMFA shall designate a Privacy Officer (**Senior Programming Manager**) to be accountable for CDMFA compliance. The Privacy Officer shall ensure adherence to this Policy by training staff, developing critical pathways for complaints and/or inquiries, and designing security measures to protect personal information possessed by the CDMFA.
- 4.2. **Identifying Purposes.** The purpose for which personal information is collected shall be identified by the CDMFA at or before the time the information is collected. The CDMFA shall only collect information pertinent to its Football Programming and services.
- 4.3. **Type of Information Collected.** The CDMFA collects personal information from interested parties, typically its members, prospective members, coaches, officials, participants, administrators, volunteers, contractors, and vendors directly for the purposes of conducting Football Programming. This information may be obtained in person, by mail, over the phone/facsimile or electronically through the CDMFA or its member Participating



Associations. Individuals provide the necessary information, as requested, based on their personal need. This information may include, but is not limited to:

- 4.3.1. Names, addresses, phone and fax numbers, and email addresses collected for the purposes of facilitating membership communication related to CDMFA upcoming events, programs, and activities.
- 4.3.2. Names, addresses, email addresses provided voluntarily by an individual who accesses secure areas of [www.cdmfa.com](http://www.cdmfa.com).
- 4.3.3. Information pertaining to athletes:
  - 4.3.3.1. Names, addresses, phone and fax numbers, email addresses, dates of birth, and historical information (athlete biography and statistics) of players may be collected to determine eligibility, geographical, division of play (age group), level of play, and transfer information consistent with CDMFA regulations.
  - 4.3.3.2. Information concerning an individual's skill level and development, and feedback on programs may be collected to ensure present and future program success.
  - 4.3.3.3. Personal health information such as allergies, emergency contact and past medical history for use in the case of a medical emergency.
  - 4.3.3.4. Athlete information including height, weight, uniform size, shoe size, feedback from coaches and trainers, performance results for athlete registration forms, outfitting uniforms, media relations, and various components of athlete and team selection.
  - 4.3.3.5. Emergency contact information such as the names, addresses, phone numbers, and email addresses of players' parents, and information regarding educational information, skill levels, ability, and health may be collected to ensure compliance with CDMFA residency regulations and that activities are carried out in a safe and secure environment.
- 4.3.4. The names, addresses, phone and fax numbers, email addresses of officials, coaches, and administrators may be collected to determine level of certification and coaching qualifications, are consistent with CDMFA regulations.
- 4.3.5. Personal information collected for the purposes of football registrations may also be utilized for football specific research purposes, including but not necessarily limited to, football demographic research.
- 4.3.6. Performance data, typical of football, may be collected for the purpose of promoting both the individual and contest.
- 4.3.7. Names, addresses, phone and fax numbers, and email addresses for the purpose of providing insurance coverage, managing insurance claims, and conducting insurance investigations.
- 4.3.8. Personal information (such as credit card information) that is required to undertake the supply of services or products and payment for said services or products an individual has requested in compliance with the law and regulatory requirements as part of normal business transactions and record keeping.
- 4.3.9. Personal information required to provide, administer, and manage the service, program, or product requested integral with CDMFA products and services.
- 4.3.10. Banking information, social insurance numbers, criminal records checks, personal reference information, and résumés required to administer CDMFA hiring policy and payroll.
- 4.3.11. Appeals and regulations challenges as well as information collected to defend



CDMFA against legal action brought against CDMFA.

- 4.3.12. If a purpose has not been identified herein nor consent given for such purpose, CDMFA shall seek consent from individuals. This consent shall be documented as to when and how it was received.

## **5. CONSENT**

- 5.1. The knowledge and consent of the individual are required for the collection, use or disclosure of personal information. CDMFA shall use personal information for only the specified uses. By consenting to provide information to CDMFA, the individual is deemed to consent to the use of the information for the purposes of Football Programming and to disclosure of the information to other associated organizations for the same purpose. In addition to using personal information for Football Programming purposes, CDMFA may use personal information for the purposes of providing promotional opportunities or football specific communications and association updates. CDMFA shall provide an opportunity for the member to consent to these opportunities during the registration process.
- 5.2. CDMFA believes medical records, medical history and medical forms of the individual may be of assistance in an emergency situation and therefore CDMFA may request them and consider receipt of this information as consent for its subsequent use in an emergency medical situation.
- 5.3. Individuals may decline to have their personal information collected, used, or disclosed for certain purposes. If at any time individuals wish to withdraw consent, they may do so by contacting the Privacy Officer. The Privacy Officer shall explain the impact of withdrawal on any services provided by CDMFA. Because football by its nature is a contact sport and injuries are to a certain extent inherent in the game, CDMFA reserves the right to refuse participation for the safety and well-being of the individual and public interest should the necessary personal information required not be disclosed.
- 5.4. CDMFA may collect personal information without consent where reasonable to do so and where permitted by law.

## **6. LIMITING COLLECTION**

- 6.1. The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization.
- 6.2. All information shall be collected by fair and lawful means.
- 6.3. All documents obtaining personal information shall have a collection, use, and disclosure of personal information statement contained therein
- 6.4. CDMFA shall not use any form of deception in gaining personal information from its members.
- 6.5. CDMFA shall advise potential registration candidates, through its members or by reference to our web site at [www.cdmfa.com](http://www.cdmfa.com), of the purpose for the collection of the data requested at the time of registration.
- 6.6. CDMFA shall ensure that all collectors of personal information are familiar with the potential use of the personal data.
- 6.7. All personal data collected by CDMFA shall be maintained by CDMFA.
- 6.8. CDMFA shall request individual permission for the use of any personal data collected which is extraneous to that which has been identified above unless authorized by law.

## **7. LIMITING USE, DISCLOSURE AND RETENTION**

- 7.1. Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law.
- 7.2. CDMFA shall limit the use of personal information collected to only those purposes identified



- within this Policy, except with the consent of the individual as legally required.
- 7.3. CDMFA collects, uses, and discloses only such information from individuals as is required for the purpose of providing services or information to them, managing databases, conducting research and such other purposes as described in CDMFA's Privacy Policy.
  - 7.4. CDMFA does not sell, trade, barter, or exchange for consideration any Personal Information obtained.
  - 7.5. CDMFA shall retain personal information in a manner that is consistent with its other statutory and legal requirements. CDMFA shall only retain personal information only as long as is reasonably necessary to meet these requirements.
  - 7.6. Registration data and athlete information shall be retained for a period of three years after an individual has left a program of CDMFA, in case of the event that the individual chooses to return to the program.
  - 7.7. Parental/Family information shall be retained for a period of three years after an individual has left a program of CDMFA, in case of the event that the individual chooses to return to the program.
  - 7.8. Information collected by coaches shall be retained for a period of three years after an individual has left a program of CDMFA, in case of the event that the individual chooses to return to the program.
  - 7.9. Employee information shall be retained for a period of seven years in accordance with Canada Customs and Revenue Agency Requirements.
  - 7.10. Personal health information shall be immediately destroyed when an individual chooses to leave a CDMFA program.
  - 7.11. Information pertaining to infractions shall be retained for a period of four years, in case of the event that the individual chooses to return to the program.
  - 7.12. Marketing information shall be immediately destroyed upon compilation and analysis of collected data.
  - 7.13. CDMFA may from time to time enlist the services of third-party vendors in order to provide football programs, technical and support services. Prior to enlisting the services of these firms, CDMFA shall ensure that treatment of personal information remains consistent with the Privacy Policy of CDMFA.
  - 7.14. CDMFA may disclose to a government authority that has asserted lawful authority to obtain the information or where CDMFA 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.
  - 7.15. CDMFA may at some point be involved in the merger, transfer or reorganization of its activities. CDMFA may disclose personal information to the other party in such a transaction. CDMFA shall ensure that treatment of personal information remains consistent with the Privacy Policy of CDMFA.
  - 7.16. CDMFA may at its discretion release personal information for the purposes of collecting debts which may be owed to CDMFA.
  - 7.17. Documents shall be destroyed via shredding. Electronic files shall be deleted in their entirety. CDMFA shall also ensure that the hard drive is physically destroyed should any hardware be discarded.

## **8. ACCURACY**

- 8.1. Personal information shall be accurate, complete, and up to date as is necessary for the



- purposes for which it is to be used.
- 8.2. CDMFA shall make all efforts to ensure that all entrusted personal information is maintained in an accurate manner.
- 8.3. CDMFA shall consider the interests of individuals in decision making, ensuring that decisions are not based on flawed personal information.
- 8.4. CDMFA shall update information upon notification.

## 9. SAFEGUARDS

- 9.1. Security safeguards appropriate to the sensitivity of the information shall protect personal information.
- 9.2. CDMFA and its representatives are required to treat all personal information confidentially.
- 9.3. CDMFA maintains reasonably available safeguards that comply in all material respects with industry standards to guard personal information against unauthorized access, disclosure, copying, loss, destruction, use, or modification.
- 9.4. Methods of protection and safeguards to be employed shall include but in no way be limited to locked files, offices and storage areas, security clearances, and need-to-know access, as well as technological measures such as passwords, encryption, and firewalls.
- 9.5. The level of safeguards employed by CDMFA shall be directly related to the level of sensitivity of the personal information collected.
- 9.6. The following steps shall be taken to ensure security:
  - 9.6.1. Paper information is either under supervision or secured in a locked or restricted area.
  - 9.6.2. Electronic hardware is either under supervision or secured in a locked or restricted area. In addition, passwords are used on computers.
  - 9.6.3. Paper information is transmitted through sealed, addressed envelopes or in boxes by reputable courier/delivery companies.
  - 9.6.4. Electronic information is transmitted through a direct line or is encrypted.
  - 9.6.5. External consultants and agencies with access to personal information shall provide CDMFA with appropriate privacy assurances.

## 10. OPENNESS

- 10.1. An **association or team** shall make readily available to **its members** specific information about **the association's** policies and practices relating to the management of personal information.
- 10.2. CDMFA shall publicly disclose (via web site or upon request by contacting the Privacy Officer) the methods by which CDMFA handles personal information.
- 10.3. The information available may include but is not limited to:
  - 10.3.1. The name, address, and phone number of the CDMFA Privacy Officer.
  - 10.3.2. The required forms to access or change personal information.
  - 10.3.3. A description of the type of personal information held by CDMFA and the general uses thereof.

## 11. INDIVIDUAL ACCESS

- 11.1. Upon request, individuals shall be informed of the existence, use and disclosure of their personal information and shall be given access to that information.
- 11.2. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.
- 11.3. Subject to applicable legislation and upon reasonable notice in writing, CDMFA shall allow an individual access and review of the personal information held by CDMFA.
- 11.4. CDMFA shall provide the requested information in a timely manner and understandable





format at either no expense or at nominal expense relating to photocopying and shipping expenses.

- 11.5. CDMFA shall disclose the source of the information when requested and provide an account of third parties to whom the information may have been disclosed.
- 11.6. Should the individual believe that any personal information is incomplete or incorrect; the individual may advise CDMFA to update the information. The information shall be corrected by CDMFA in a timely manner. If the information is subject to interpretation or is an opinion, CDMFA shall not change the record of information but may annotate the record to indicate the individual's views. Pertinent third parties shall also be made aware of the corrections.
- 11.7. CDMFA may request sufficient information to confirm an individual's identity before the release of personal information to the individual.
- 11.8. Individuals may be denied access to their personal information. Upon refusal, CDMFA shall inform the individual of the reasons for such actions and the associated provisions of PIPEDA and PIPA. The denial of requests may be based upon:
  - 11.8.1. The information being too prohibitively costly to provide.
  - 11.8.2. The information containing reference to other individuals.
  - 11.8.3. The information being subject to solicitor-client or litigation privilege.
  - 11.8.4. Legal, security, or commercial proprietary reasons

## **12. CHALLENGING COMPLIANCE**

- 12.1. An individual shall address any challenges concerning compliance with these principles and PIPEDA to the Privacy Officer.
- 12.2. CDMFA shall have procedures in place to resolve possible grievances.
- 12.3. Upon receipt of a challenge, CDMFA shall acknowledge receipt of the complaint, clarify the nature of the complaint, and make the complaint procedures readily available and accessible.
- 12.4. The Privacy Officer shall promptly review and investigate all allegations of policy violations and/or complaints. The review shall look at practices and procedures which have occurred and determine the appropriate measures to be taken.
- 12.5. The Privacy Officer shall submit a written report to CDMFA within twenty-eight (28) days of receipt of the complaint.
- 12.6. The Privacy Officer shall notify the complainant of the investigation outcome and the measures taken to rectify the challenge within thirty (30) days of the original complaint.

## **13. PRIVACY ON THE INTERNET**

- 13.1. CDMFA respects the privacy of its Internet users and shall protect that privacy as vigorously as possible.
- 13.2. CDMFA does not collect information that personally identifies individuals except when individuals provide such information on a voluntary basis.
- 13.3. CDMFA shall only collect information that is voluntarily provided by the user and undertakes that such information shall be kept strictly confidential. Individual information provided to CDMFA to gain access to its web site shall not be sold or made available to a third party.
- 13.4. CDMFA reserves the right to perform statistical analyses of user behaviour and characteristics in order to measure interest in and use of the web site so as to improve design and navigation. Only aggregated data shall be used for this sole purpose.
- 13.5. Users should also be aware that certain non-personal information and data may be automatically collected by CDMFA through the operation of "cookies". "Cookies" are small text files that identify an individual computer's browser entering a website. They allow the site to track that browser's movement through the site over several sessions. Through



cookies, a web site can recognize repeat users, facilitate the user's access to and use of the site, and allow a site to track usage behaviour that allows content improvements.

- 13.6. If individuals do not want a cookie placed on their computer by CDMFA, they may disable cookies altogether by modifying the Preference section of Netscape or Internet Explorer browser.
- 13.7. If individuals wish to be informed of the appearance of cookies, they may turn on a warning prompt by modifying the cookie warning section.
- 13.8. Individuals should be cognizant that other sites linked to the CDMFA web site may not share the same policies as CDMFA.