

# Privacy Policy

## Introduction

This Privacy Policy outlines how Cold Lake Soccer Association (CLMSA) collects, uses, stores, and discloses personal information. It is based on the requirements of the Personal Information Protection and Electronic Documents Act (PIPEDA) and the Personal Information Protection Act (PIPA) of Alberta, which apply to commercial activities of private-sector organizations. CLMSA also takes into account Alberta's Health Information Act (HIA) for any health-related data and other applicable laws. In Alberta, PIPA generally applies before PIPEDA, but PIPEDA will still apply if personal information crosses provincial or territorial borders.

"Organization" in this policy refers to CLMSA. "Representatives" refers to all individuals employed by, or engaged in activities on behalf of, CLMSA, including staff, administrators, directors, officers, committee members, and volunteers.

## 1. Definitions

For the purposes of this policy, the following terms have these meanings:

1. **Acts** – Canada's PIPEDA and Alberta's PIPA. PIPEDA governs the collection, use, and disclosure of personal information in the course of commercial activities. PIPA applies to many private-sector organizations in Alberta, including some non-profits, except where information is collected, used, or disclosed solely for non-commercial purposes.
2. **Commercial Activity** – Any transaction, act, or conduct of a commercial character. Examples include selling, bartering, or leasing of donor or membership lists.
3. **IP Address** – A numerical label assigned to electronic devices participating in a computer network that uses Internet Protocol.
4. **Personal Information** – Information about an identifiable individual, including but not limited to name, gender identity, age, home address or phone number, email, ethnic background, family status, health history, and conditions. Health-related data is subject to Alberta's Health Information Act (HIA).
5. **Representatives** – All individuals employed by, or engaged in activities on behalf of, CLMSA.

## 2. Purpose

The purpose of this policy is to govern the collection, use, and disclosure of personal information in the course of CLMSA's commercial activities, in a manner that recognizes individuals' right to privacy and CLMSA's need to collect, use, and disclose personal information to carry out its operations.

## 3. Application

This policy applies to CLMSA and its representatives in connection with personal information that is collected, used, or disclosed during any commercial activity related to the organization. The

Board of Directors of CLMSA will interpret any provision of this policy that is contradictory, ambiguous, or unclear.

#### **4. Obligations**

1. **Compliance with the Acts.** CLMSA is obligated to follow and abide by PIPEDA and PIPA in all matters involving personal information. PIPEDA applies when personal information crosses provincial or territorial borders or when CLMSA engages in commercial activities. PIPA applies within Alberta and covers some non-profits if they are engaged in commercial activities.
2. **Additional Requirements.** In addition to legal obligations, CLMSA's representatives must comply with this policy. Representatives must not:
  - Disclose personal information to a third party unless properly consented to in accordance with this policy.
  - Place themselves in a position where they are obliged to another organization to disclose personal information.
  - Disclose personal information to family members, friends or other organizations for personal benefit.
  - Derive personal benefit from personal information acquired through CLMSA.
  - Accept gifts or favours given in anticipation of, or in recognition of, disclosure of personal information.

#### **5. Accountability**

CLMSA shall designate a **Privacy Officer** to implement and monitor this policy. The Privacy Officer is responsible for:

1. Implementing procedures to protect personal information.
2. Establishing procedures to receive and respond to complaints and inquiries.
3. Recording all persons having access to personal information.
4. Ensuring any third-party providers abide by this policy.
5. Training and communicating to staff information about CLMSA's privacy policies and practices.

The Privacy Officer will handle access requests and complaints related to personal information.

**Contact information for the Privacy Officer is [vicepresident@clmsa.ca](mailto:vicepresident@clmsa.ca)**

#### **6. Identifying Purposes**

CLMSA may collect personal information from participants and prospective participants for purposes including, but not limited to:

##### **6.1 Communications**

1. Sending newsletters or e-news with content related to CLMSA programs, events, activities, discipline, appeals, and other information.
2. Publishing articles and postings on the CLMSA website, displays, or posters.

3. Award nominations, biographies, and media relations.
4. Communication within and between stakeholders and individuals.
5. Checking residency status (for residency requirements).

## **6.2 Registration, Database Entry, and Monitoring**

1. Program, event, and activity registration.
2. Recording coaching certifications, qualifications, and selection.
3. Recording officiating certifications and qualifications.
4. Determining eligibility, age group, and appropriate level of play or competition.
5. Athlete registration, outfitting uniforms, and team selection.
6. Technical monitoring, officials' training, education, sport promotion, and media publications.

## **6.3 Sales, Promotions, and Merchandising**

1. Purchasing equipment, coaching manuals, resources, and other products.
2. Promotion and sale of merchandise.

## **6.4 General Purposes**

1. Travel arrangements and administration.
2. Implementing CLMSA's screening program.
3. Handling medical emergencies, emergency contacts, or reports relating to medical issues.
4. Determining membership demographics.
5. Managing insurance claims and investigations.
6. Video recording and photography for personal use by spectators, parents, and friends, and for promotional use by CLMSA.
7. Payroll, honoraria, and administration of insurance and health plans.
8. Disclosing results of discipline and appeal decisions to enforce sanctions.
9. Sharing discipline and appeal decisions with governing organizations to enforce sanctions across the sport sector.

CLMSA shall seek consent from individuals when personal information is used for a commercial activity not previously identified. Consent will be documented to indicate when and how it was obtained.

## **7. Consent**

1. **Implied Consent.** By providing personal information to CLMSA, individuals consent to the use of that information for the purposes identified in this policy.
2. **Written Consent.** CLMSA will obtain consent by lawful means (e.g., registration forms, check boxes, written or oral consent) at the time of collection and before using or disclosing personal information for a new purpose.
3. **Sensitivity Consideration.** CLMSA will determine whether written or implied consent is appropriate based on the sensitivity of the information and the individual's reasonable expectations.

4. **Not a Condition.** CLMSA will not require participants to consent to the collection, use or disclosure of personal information beyond what is necessary to provide the product or service.
5. **Withdrawal of Consent.** Individuals may withdraw consent by contacting the Privacy Officer in writing. The Privacy Officer will explain the implications of such withdrawal.
6. **Minors or Incapacity.** Consent shall be obtained from a parent, legal guardian, or person with power of attorney when individuals are minors, seriously ill, or mentally incapacitated.
7. **No Consent Required.** CLMSA is not required to obtain consent where:
  - The organization has reasonable grounds to believe the information could be useful when investigating a contravention of a law, and the information is used for that investigation.
  - An emergency threatens an individual's life, health, or security.
  - The information is used for statistical or scholarly research.
  - The information is publicly available as specified in the Acts.
  - The use is clearly in the individual's interest, and consent is not available in a timely way.
  - Knowledge and consent would compromise the availability or accuracy of the information, and collection is required to investigate a breach of an agreement or a law.

## 8. Disclosure Without Consent

CLMSA may disclose personal information without the individual's knowledge or consent in the following circumstances:

1. To a lawyer representing CLMSA.
2. To collect a debt owed to CLMSA.
3. To comply with a subpoena, warrant, or court order.
4. To a government institution that requests the information under lawful authority for law-enforcement or national security purposes.
5. To an investigative body if CLMSA believes the information concerns a breach of an agreement or a contravention of a law.
6. In an emergency threatening an individual's life, health, or security.
7. To an archival institution.
8. Twenty years after the individual's death or one hundred years after the record was created.
9. If the information is publicly available as specified in the Acts.
10. If otherwise required by law.

## 9. Accuracy, Retention and Security

1. **Limited Collection.** CLMSA will not collect, use, or disclose personal information indiscriminately. Information will only be collected for purposes identified in this policy or as required by law.
2. **Retention.** Personal information shall be retained only as long as reasonably necessary to enable participation in CLMSA, maintain accurate historical records, or as required by law.
3. **Destruction.** Paper documents will be destroyed by shredding; electronic files will be deleted in their entirety when no longer required.

4. **Security.** Personal information shall be protected by security safeguards appropriate to the sensitivity of the information, against loss or theft, and against unauthorized access, disclosure, copying, use, or modification.

## **10. Access**

1. Upon written request and with CLMSA's assistance, an individual may be informed of the existence, use, and disclosure of their personal information and will be given access to that information. An individual is entitled to be informed of the source of the personal information and third parties to whom the information has been disclosed.
2. Requested information shall be disclosed within thirty (30) days of receipt of the written request at no cost or at nominal photocopying charges, unless there are reasonable grounds to extend the time limit.
3. Access may be denied if:
  - Providing the information would be prohibitively costly.
  - The information contains references to other individuals.
  - The information cannot be disclosed for legal, security, or commercial proprietary reasons.
  - The information is subject to solicitor-client privilege or litigation privilege.
4. Upon refusal, CLMSA will inform the individual of the reasons and the applicable provisions of the Acts.

## **11. Compliance Challenges**

1. Individuals may challenge CLMSA's compliance with this policy and the Acts to the Privacy Officer.
2. Upon receipt of a complaint, CLMSA will:
  - Record the date the complaint is received.
  - Notify the Privacy Officer who will act impartially to resolve the complaint.
  - Acknowledge receipt of the complaint and clarify its nature within three (3) days.
  - Appoint an investigator (internal or independent) with appropriate skills.
  - Provide the investigator with access to relevant files and personnel.
  - Within thirty (30) days of receiving the complaint, submit a written report to the Board outlining the investigation's findings.
  - Inform the complainant of the outcome and any steps taken to rectify the issue, including amendments to policies and procedures.
3. CLMSA shall not dismiss, suspend, demote, discipline or harass any director, officer, employee, trainer, contractor or decision-maker, or deny that person a benefit because they, acting in good faith and on the basis of reasonable belief:
  - Challenge CLMSA's compliance with this policy.
  - Refuse to contravene this policy or the Acts.
  - Take precautions not to contravene this policy or the Acts, even if those precautions oppose their regular duties.

## **Appendix A – Consent Statement (Example)**

CLMSA will include a consent statement similar to the following when collecting personal information:

1. **Authorization to collect and use information:** I authorize CLMSA to collect and use personal information about me for the purposes described in CLMSA's Privacy Policy.
2. **Sharing with governing bodies:** In addition to the purposes described in CLMSA's Privacy Policy, I authorize CLMSA to share my information with governing organizations (e.g., Alberta Soccer Association and applicable provincial or territorial soccer bodies) as required for registration and compliance purposes.
3. **Audio/visual release:** I authorize CLMSA to photograph and/or record my image and/or voice on still or motion picture film and/or audio tape, and to use this material to promote the sport through newsletters, websites, television, film, radio, print and display. I understand that I waive any claim to remuneration for use of audio/visual materials used for these purposes.
4. **Withdrawal:** I understand that I may withdraw my consent at any time by contacting CLMSA's Privacy Officer, who will advise me of the implications of such withdrawal.

CLMSA Approved Date: Aug 11, 2025

President's Signature:  Date: 11 Aug 2025