



FORT SASKATCHEWAN RINGETTE ASSOCIATION

TITLE: PRIVACY

POLICY #: 1800

Created: May 31, 2018	Last updated: March 12, 2019	Approved: March 12, 2019
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Ver no.	Effective Date	Significant Changes

1.0 Purpose

To outline the principles and guidelines that the Fort Saskatchewan Ringette Association (FSRA) follows in gathering, using, and disclosing personal information gathered from clients in accordance with Alberta's Personal Information Protection Act (PIPA).

2.0 Scope

This policy applies to all paid employees, members, and participants of the FSRA and any of the personal information that is collected, used or disclosed during any commercial activity related to the FSRA. The FSRA Executive Board is free to interpret any ambiguous provision of this policy except where provided by PIPA.

3.0 Terms

Personal Information Protection Act (PIPA) – Provincial legislation that governs how companies and non-profit organizations in the private sector collect, use, and disclose personal information from their clients and employees.

Personal Information – Information that can be used to identify a specific individual. This can include an individual's name, personal email address, home address and phone number, age, sex, marital or family status, an identifying number, financial information, and educational history.

Privacy Officer – A paid employee of the Fort Saskatchewan Minor Sports Association.

Implied Consent – By providing the FSRA with their personal information, individuals are implying consent for the information to be used and disclosed for the reasons described in this policy.

4.0 Policy

4.1 A paid employee, member, or participant of the FSRA must not:

- Disclose personal information to a third party during any business or transaction unless such business, transaction or other interest is properly consented to in accordance with this Policy;



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- Knowingly place themselves in a position where they are obligated to disclose personal information;
- Disclose personal information to family members or friends;
- Derive any personal benefit from personal information acquired in the course of his or her duties; or
- Accept any gift that could be misconstrued as being given in anticipation of or recognition for the disclosure of personal information.

4.2 The Privacy Officer is responsible for the implementation of this policy and monitoring information collection and data security and ensuring that all staff receives appropriate training on privacy issues and their responsibilities. The Privacy Officer also handles personal information access requests and complaints.

4.3 FSRA will collect personal information for reasons that include, but are not limited to:

- Receiving communications such as newsletters and e-letters;
- Communications between employees, members, and participants regarding the management of activities and events;
- Database entry;
- Determining eligibility or age groups;
- Implementing the FSRA's screening program;
- Promoting the sale of merchandise;
- Medical emergencies;
- Registering a player;
- Selecting teams;
- Purchasing equipment, manuals, and other products;
- Publishing content on the FSRA website, displays, trophies, and in communication with the media;
- Determining membership demographics and program wants and needs; and
- Managing insurance claims and investigations.

4.4 The FSRA will seek consent from individuals when personal information is used for a commercial purpose not identified above. This consent will be documented as to when and how it was received.

4.5 While the FSRA will attempt to lawfully obtain consent during collection and prior to disclosing personal information whenever possible, it may collect information without consent when reasonable to do so and when permitted by law. The FSRA can also not receive consent from a minor (below the age of 18) or an individual who is ill or mentally incapacitated and must receive consent from a parent, guardian, or someone with power of attorney.



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- 4.6 The FSRA will not, as a condition of a product or service, require an individual to consent to the collection, use, and disclosure of personal information beyond what is required to fulfill the purpose of that product or service.
- 4.7 Consent can be written or implied. In determining the form of consent to use, the FSRA will take into account the sensitivity of the information, as well as the individual's reasonable expectations. Individuals may consent to the collection and specified use of personal information by completing an application form, checking off a check-box, or giving written or oral consent. An individual may withdraw their consent in writing at any time. The FSRA will inform the individual of the consequences of withdrawing consent.
- 4.8 The FSRA does not need consent to collect an individual's personal information if:
- It is within the individual's best interests;
 - Collection of information is required for an investigation into a breach of law;
 - The information is for journalistic, artistic or literary purposes; or
 - The information is publicly available.
- 4.9 The FSRA does not need consent to use an individual's personal information if:
- The FSRA has reason to believe the information could be useful in an investigation into a breach of law;
 - There is an emergency that threatens the individual's life, health, and security;
 - It is publicly available; or
 - The use is clearly in the individual's best interests and consent is not readily available.
- 4.10 The FSRA does not need consent to disclose an individual's personal information if:
- It is to the FSRA's lawyer;
 - It is to collect a debt the individual owes the FSRA;
 - It is to comply with a subpoena, warrant, or court order;
 - It is to an investigative body identified by PIPA or a government institution that has lawfully requested the information for the purposes of an investigation into a breach of law;
 - It is to an investigative body identified in PIPA or a government institution and the FSRA believes the information concerns a breach of law;
 - There is an emergency that threatens the individual's life, health, or security (the FSRA will inform the individual of the disclosure);
 - It is to an archival institution;
 - It has been twenty years since the individual's death, or 100 years since the record was created;



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- The information is publicly available; or
- Otherwise required by law.

4.11 Personal information can only be retained for as long as is reasonably necessary to enable participation in the FSRA, to maintain accurate historical records and or as may be required by law. 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.

4.12 Personal information will be accurate, complete and as up to date 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 the individual.

4.13 Personal information will be protected by security safeguards appropriate to the sensitivity of the information against loss or theft, unauthorized access, disclosure, copying, use or modification. Employees will be made aware of the importance of maintaining personal confidential information and may be required to sign confidentiality agreements.

4.14 The FSRA will make available:

- The name or title, and address of the Privacy Officer;
- The means of gaining access to personal information the FSRA holds;
- A description of the type of personal information the FSRA holds, as well as a general account of its use;
- A copy of this policy; and
- Third parties in which personal information is made available.

4.15 Upon written request, and with assistance from the FSRA, 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. Sufficient information must be given to confirm the individual's identity before this information can be released

4.16 Requested information will be disclosed to the individual within 30 days of receipt of the written request at no cost to the individual, or at nominal costs relating to photocopying expenses, unless there are reasonable grounds to extend the time limit.



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4.17 An individual may be denied access to his or her personal information if:

- The information is prohibitively costly to provide;
- The information contains references to other individuals;
- The information cannot be disclosed for legal, security, or commercial proprietary purposes; or
- The information is subject to solicitor-client or litigation privilege.

In the event of a refusal the FSRA will inform the individual of the reason and the associated provisions of PIPA and applicable provincial privacy legislation.

4.18 In the event that an individual is not satisfied with a decision made under this policy, an appeal can be made as of the FSRA's Appeal Policy (#1330), with the Privacy Officer taking the place of the Appeals Officer.

4.19 All files and written materials relating to confidential information will remain the property of the FSRA and upon termination of involvement/employment with the FSRA or upon request of the FSRA, the FSRA paid employee, member, or participant will return all confidential information received in written or tangible form, including copies, or reproductions or other media containing such confidential information, immediately upon such request.

4.20 Copyright and other intellectual property rights in all written material (including material in electronic format) and other works produced in connection with employment or involvement with the FSRA will be owned solely by the FSRA, who will have the right to use, reproduce or distribute such material and works, or any part thereof, for any purpose it wishes. The FSRA may grant permission for others to use such written material or other works, subject to such terms and conditions as the FSRA may prescribe.

4.21 A breach of any provision in this policy may give rise to discipline in accordance with the FSRA's Discipline and Complaints Policy (#1310) or legal recourse.