TITLE: CLIENT PRIVACY

POLICY #: 4212

Created	: June 19, 2017	Last updated: October 24, 2017	Approved: October 24, 2017
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Ver no.	Effective Date	Significant Changes

1.0 Purpose

To outline the principles and guidelines that the Fort Saskatchewan Minor Sports Association (FSMSA) 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 and volunteers of the FSMSA who have access to personal information, as well as those of the Minor Sport programs under its umbrella, currently including baseball, fastball, gymnastics, hockey, judo, lacrosse, ringette, soccer and any other Minor Sports that may join the FSMSA. This policy only applies to personal information that is collected from the FSMSA's clients.

3.0 Terms

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.

Client – Anyone who could be considered a "customer" of the FSMSA. This includes the children enrolled in the various Minor Sports, as well as their parents or legal guardians.

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.

4.0 Policy

- 4.1 The FSMSA will only use or disclose a client's personal information for the purpose it was collected, unless otherwise authorized by PIPA.
- 4.2 The FSMSA will collect only the personal information necessary for providing such services as delivering requested products and services, enrolling clients in their chosen Minor Sport, and sending out association membership information. This information is usually collected from clients directly, but can be gathered from third parties with permission from the client, or as authorized by law.
- 4.3 Clients will be informed of the purpose that their information is being collected for either before or during the time of collection. The FSMSA will not use the information for any purpose not outlined in this notice. The only time the FSMSA does not notify clients is



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when they volunteer their information for an obvious purpose. For example, producing a credit card to pay a membership fee.

- 4.4 The FSMSA will ask for consent to collect, use, disclose, or alter client personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. Consent for collection may be assumed if the information is volunteered for an obvious purpose, and consent for use or disclosure is assumed for continuing to use the information for the purpose it was gathered for.
- 4.5 Certain services of the FSMSA cannot be provided to a client unless he or she consents to the collection, use or disclosure of certain personal information. In cases where express consent is necessary, clients will be able to consent either orally or in writing.
- 4.6 In certain cases, the FSMSA and the Minor Sports under its umbrella may rely on opt-out consent. In these cases, the client can may refrain from giving consent to gather, use, or disclose personal information, usually by selecting a checkbox on the FSMSA's or associated Minor Sport's website during registration.
- 4.7 The client may withdraw his or her consent for the use and disclosure of his or her personal information at any time. The FSMSA and its Minor Sport Programs will stop using the information immediately, unless in cases where the information must be used to fulfill the legal obligations of the FSMSA.
- 4.8 The FSMSA can gather, use, or disclose personal information without consent in special circumstances outlined in PIPA. For example, ascertaining a client's suitability for an award or honour, or an emergency situation.
- 4.9 If the FSMSA or any of its Minor Sport programs wishes to use or disclose a client's personal information for a new business purpose, it will seek permission from the client unless in certain situations allowed by the law. For example, PIPA allows for the use of personal information without consent in order to collect a debt.