

Juan de Fuca Minor Hockey Association (JDFMHA) Privacy Policy

Purpose of this policy:

This Policy describes the method in which JDFMHA will collect, use, retain, safeguard, disclose and dispose of the personal information of members, prospective members, and others including players, coaches, referees, managers and volunteers. This Policy describes the way JDFMHA will, subject to applicable legal requirements, adhere to all relevant legislative privacy requirements. The Policy describes each principle and the method of implementing each. JDFMHA will strive to meet or exceed legislative requirements and will ensure that it remains current with changing technologies and laws. Any and all changes will immediately be posted to JDFMHA's web site.

Accountability:

JDFMHA will manage all personal information in its possession in accordance with this Policy including that which may be transferred to a third party. Third party organizations who handle information on behalf of JDFMHA shall be contractually obligated to adhere to the standards of JDFMHA. JDFMHA will implement internal policies, which will facilitate adherence to this Privacy Policy including, inter alia:

- Security measures at all levels designed to protect personal information in our possession.
- Implementing procedures designed to respond to complaints and/or inquiries.
- Training in all facets of information management, including awareness of JDFMHA's Privacy Policy and policies and procedures developed in accordance with the Policy.

Identifying purpose, Type of information collected and Website:

JDFMHA shall only collect the information reasonably necessary to conduct hockey programming. Access to the Privacy policies and procedures will be readily available. Similarly, the process by which challenges may be made to JDFMHA compliance and/or adherence to the legislation in question shall be readily available and transparent.

- a) JDFMHA collects personal information from prospective members, members, coaches, referees, managers and volunteers for the purposes of conducting Hockey Programming. Specifically:
 - A player's name, address and date of birth are collected to determine that the player's geographical, division of play and level of play information are consistent with Hockey Canada and BC Hockey regulations.
 - Historical information concerning past teams played for is collected in order to determine if any of JDFMHA transfer regulations may apply.
 - Information concerning an individual's skill level and development and feedback on programs is collected to measure the success of our programs in order that we may better plan future programs.
 - Information as to a player's parents' name, address, telephone numbers and email addresses may be collected in order to facilitate emergency contact information as well as to ensure compliance with JDFMHA's residency regulations.

- Educational information may be collected in order to ensure the entire residency regulations have been adhered to.
- E-mail addresses may be collected for the purposes of facilitating membership communication related to upcoming events and programs.
- Information about skill levels, ability, emergency contacts and health to ensure our activities are carried out in a safe and secure environment.
- Personal information collected for the purposes of hockey registrations may also be used for hockey specific research purposes including but not necessarily limited to hockey demographic type research.
- Affiliates. JDFMHA has numerous organizations, which offer hockey programs under their auspices. These include, but are not necessarily limited to, Hockey Canada, BC Hockey and provincial and local, associations, and leagues. Hockey Canada, its Branches and/or JDFMHA may disclose the personal information described above to all of these organizations in order to facilitate Hockey Programming and ensure compliance with rules and regulations.

b) JDFMHA will endeavor through associations/leagues to advise potential registration candidates of the purpose for the collection of the data requested at the time of registration or by reference to our web site at www.jdfminorhockey.com. We will further endeavor to ensure that all collectors of the personal information are familiar with the potential use of the personal data.

c) JDFMHA will request individually permission for the use of any personal data collected which is extraneous to that which has been identified above, unless said usage is authorized by-law.

d) JDFMHA may also use information about an individual who accesses secure areas of www.jdfminorhockey.com. Information members are asked to provide during use of the web site may include member's name, address, e-mail address, age, sex (and the other types of personal information listed above). All such personal information will be treated within the same parameters as other personal information collected by JDFMHA through other means. It is always the member's choice to provide information in certain fields although failure to complete certain sections may inhibit the ability to fully access all areas of the web site. The web site also collects non-identifiable information about users such as the users IP address, the sections of the web site visited and the information downloaded. JDFMHA may use this non-identifiable information and disclose it to service providers, for system administration purposes and to improve the web site.

Consent:

JDFMHA will use the personal information for the uses specified above in this document. By consenting to provide information to JDFMHA, it is deemed to be a consent of JDFMHA use of the information for the purposes of Hockey Programming listed in this Privacy Policy and to disclosure of the information to other associated organizations for the same purpose.

a) In addition to using personal information for Hockey Programming purposes, JDFMHA may from time to time wish to use the member's name, address and contact information for the purposes of providing promotional opportunities, including by providing the information to the other association and to other third parties who JDFMHA believes provide services or goods that may be of interest to

the member. JDFMHA and any such third parties may contact members with promotions (or to provide further hockey specific communications and information updates). JDFMHA will provide an opportunity for the member to consent to these opportunities during the registration process. If a member consents but later wishes to opt out of this use of information later, they may do so by contacting JDFMHA.

b) JDFMHA recognizes that hockey by its nature is a contact sport and injuries are, to a certain extent, inherent in the game. Medical records, medical history and medical forms of the individual may be of assistance in an emergency situation and therefore they may be requested. While members and prospective members are under no obligation whatsoever to supply this information and may refuse to do so without penalty. JDFMHA will consider receipt of this information as consent for its subsequent use in an emergency medical situation.

c) If at any time a member wishes to withdraw consent to the use of their information for any purposes, they may do so by contacting the Board of Directors. JDFMHA will do its best to accommodate requests in a timely fashion. JDFMHA will let members know the impact of their withdrawal.

d) JDFMHA may collect personal information without consent where reasonable to do so and where permitted by its Bylaws.

Limiting Collection:

All information shall be collected fairly and lawfully within the criteria as set forth in our Privacy Policy.

a) JDFMHA shall not indiscriminately collect information. The amount and type of information we collect shall be limited to that which is required to fulfill our identified purposes.

b) JDFMHA will not use any form of deception in gaining personal information from its members.

Limiting use, Disclosure and Retention:

Subject to applicable legislation, JDFMHA shall limit use of personal information it collects to purposes that we have disclosed in Sections (Identifying Purposes) and (Consent).

a) JDFMHA shall maintain documents for certain periods of time dependent upon necessity. More specifically:

- Maintain registration data for a three-year period after an individual has left JDFMHA programs in the event that an individual chooses to return to the programs after leaving.
- Parental/family information will be normally maintained for a similar three-year period after a member has left JDFMHA programs.
- Affiliates - JDFMHA has numerous organizations that offer hockey programs under the auspices of JDFMHA. As explained above, JDFMHA may from time to time share information with these organizations, associations, and leagues in order to facilitate Hockey Programming and ensure compliance with rules and regulations.
- JDFMHA may from time to time enlist the services of third party vendors in order to provide hockey programs, technical and support services. Prior to enlisting the services of these firms we

will contractually commit them to treat member personal information consistent with the Privacy Policy of JDFMHA.

- JDFMHA may at some point be involved in the sale, merger, transfer or reorganization of its activities. JDFMHA may disclose personal information to the other party in such a transaction.
- JDFMHA will ensure that third parties are contractually obligated to treat this information in a manner consistent with this policy.
- JDFMHA may disclose member personal information to a government authority that has asserted its lawful authority to obtain the information or where JDFMHA has reasonable grounds to believe the information could be useful in the investigation of an unlawful activity, or to comply with subpoena or warrant or an order made by the court, person, or body with jurisdiction to compel the production of the information or otherwise as permitted by applicable law.
- JDFMHA may at its discretion release personal information for the purposes of collecting debts that may be owed to JDFMHA.

- b) Certain documents may be subject to legislated retention periods and these will be respected at all times by JDFMHA.

Accuracy:

JDFMHA shall strive to ensure to the extent it can that the information entrusted is maintained in an accurate manner. JDFMHA shall try to maintain the interests of the individual and attempt to ensure that decisions are not made for or about an individual based on personal information that is flawed. JDFMHA shall only update information in the event of a renewal, registration and/or an update.

Safeguards:

Security safeguards have been implemented to ensure personal information is protected from theft as well as unauthorized access, disclosure, copying, use or modification thereof. The level of safeguards employed shall be directly related to the level of sensitivity of the personal information collected. The more sensitive the information, the higher the level of security employed.

Methods of protection and safeguards to be employed shall include but in no way be necessarily limited to locked files, offices and storage areas, security clearances and need to know access as well as technological measures such as passwords and encryption.

Openness:

JDFMHA publicly discloses the methods by which it handles personal information. This information is readily available through the policy on the JDFMHA website or upon request by contacting the Board of Directors. The information available includes:

- a) The name, address, email and phone number of JDFMHA's Board of Directors.
- b) A description of the type of personal information held by JDFMHA and general uses thereof. This includes:

- registration information, including name, date of birth, address, past teams played on, medical information and e-mail addresses.
- information used for scouting, potential sponsorship opportunities, donors, alumni and information retained for the purposes of JDFMHA's business contacts.
- information that may be made available to related organizations, JDFMHA, its member associations, leagues and/or third party service providers, in accordance with the provisions of this Privacy Policy.

Individual Access:

Subject to applicable legislation, upon request by the individual concerned JDFMHA shall disclose whether or not it actually holds personal information on an individual. JDFMHA shall disclose the source of this information when requested and provide an account of third parties to whom the information may have been disclosed.

- a) JDFMHA may request sufficient information to confirm member identity before releasing personal information to the member.
- b) Subject to applicable legislation, JDFMHA shall endeavor to provide this information within 30 days of receipt of the information requested and only charge nominal fees for the purpose of offsetting its expenses incurred in supplying the requested information. This information shall be provided in an understandable format at the time of the request.
- c) Any inaccurate information that is brought to the attention of JDFMHA shall be corrected as quickly as possible and any pertinent third parties shall be apprised of the corrections in due course.

Challenging Compliance:

JDFMHA has in place procedures for the resolution of grievances in the administration of its Privacy Policy.

- a) Upon receipt of a complaint JDFMHA shall make available the complaint procedures that will be simple and easy to access.
- b) JDFMHA shall investigate all complaints. If the complaint is deemed justified JDFMHA shall take the appropriate steps to ensure that compliance is achieved and will make changes to its policies to allow for compliance in the future.
- c) All complaints shall be addressed to JDFMHA's Board of Directors.