

St.Marys Ringette Association Policy

Policy Title: Privacy Policy Statement

Date revised: March 30 2020

Date reviewed

Purpose: Privacy of personal information is governed by the *Personal Information Protection and Electronics Documents Act* ("PIPEDA"). This policy describes the way that St.Marys Ringette collects, uses, retains, safeguards, discloses and disposes of personal information. This policy is based on the standards required by PIPEDA, and St. Marys Ringette Association 's interpretation of these responsibilities.

Application:

Personal information is information about an identifiable individual. Personal information includes information that relates to their personal characteristics (e.g., gender, age, income, home address or phone number, ethnic background, family status), their health (e.g., health history, health conditions, health services received by them) or their activities and views (e.g., religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information, however, does not include business information (e.g., an individual's business address and telephone number) which is not protected by privacy legislation.

Consent is required to be obtained by lawful means from individuals at the time of collection, prior to the use or disclosure of the personal information. If the consent to the collection, use or disclosure was not obtained upon receipt of the information, consent will be obtained prior to the use or disclosure of that information. St. Marys Ringette Association may collect personal information without consent where reasonable to do so and where permitted by law.

By providing personal information to St. Marys Ringette Association, individuals are consenting to the use of the information for the purposes identified in this policy.

Limiting use, disclosure and retention: Personal information will not be used or disclosed by St. Marys Ringette for purposes other than those for which it was collected as described herein, except with the consent of the individual or as required by law.

Information disclosed to a third party with consent from the individual shall be protected by a third party agreement to limit use and disclosure.

Personal information will only be collected by St. Marys Ringette to meet and maintain the highest standard of organizing and programming the sport of Ringette. St. Marys Ringette Association collects personal information from prospective members, coaches, referees, participants, managers, trainers and volunteers for purposes that include, but are not limited to, the following:

- Name, address, phone number, cell phone number, and e-mail address for the purpose
 of communicating about St. Marys Ringette programs, events and activities.
- NCCP number, education, resumes and experience for database entry at the Coaching Association of Canada to determine level of certification and coaching qualifications.
- NOCP number, education, resumes and experience for database entry at Ringette Canada to determine level of certification and officiating qualifications.
- Date of birth, age group and appropriate level of play.
- Criminal records check
- Personal health information including provincial health card numbers, allergies, emergency contact and past medical history for use in the case of medical emergency.
- Name, address, phone number, cell phone number, fax number and e-mail address for the purpose of providing insurance coverage, managing insurance claims and conducting insurance investigations.

Personal information will be retained for certain periods of time in accordance with the following:

- Registration data and athlete information will be retained for a period of three years after an individual has left a program of St. Marys Ringette Association, in the event that the individual chooses to return to the program.
- Parental/family information will be retained for a period of three years after an individual has left a program of St. Marys Ringette Association, in the event that the individual chooses to return to the program.
- Information collected by coaches will be retained for a period of three years after an individual has left a program of St. Marys Ringette Association, in the event that the individual chooses to return to the program.
- Personal health information will be immediately destroyed when an individual chooses to leave a program of St. Marys Ringette Association.
- 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.
- St. Marys Ringette Association may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where St. Marys Ringette Association 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.
- Documents will be destroyed by way of shredding and electronic files will be deleted in their entirety. When hardware is discarded, St. Marys Ringette Association will ensure that the hard drive is physically destroyed.

Safeguards: Personal information is protected by security safeguards appropriate to the sensitivity of the information against loss or theft, unauthorized access, disclosure, copying, use or modification.

Individual access: Upon written request, and with assistance from St. Marys Ringette Association, 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.

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.

If personal information is inaccurate or incomplete, it will be amended as required.

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

- This 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.
- The information is subject to solicitor-client or litigation privilege.

Upon refusal, St. Marys Ringette Association will inform the individual the reasons for the refusal and the associated provisions of PIPEDA.