



Policy Title	Privacy Policy
Responsible Subcommittee	Risk Management
Date of Approval	March 23, 2021
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## Policy Statement

This Policy describes the way WPC collects, uses, retains, safeguards, discloses, and disposes of Personal Information and states Water Polo Canada's commitment to collecting, using, and disclosing Personal Information responsibly. This policy is based on the standards required by the Personal Information Protection and Electronics Documents Act ("PIPEDA") and Water Polo Canada's interpretation of these responsibilities.

Privacy of Personal Information is governed by PIPEDA and applicable provincial legislation governing personal information. A copy of WPC's Privacy Policy is to be provided to any member upon request.

## Definitions

**"Board"** means the Board of Directors for Water Polo Canada

**"Date of Approval"** means as stated on Page 1 of the Policy;

**"Executive Director"** means the executive director of WPC;

**"including"** means including but not limited to;

**"Maltreatment"** means as it is defined in the Universal Code of Conduct to Prevent and Address Maltreatment in Sport;

**"Personal Information"** means information that can identify individuals either directly or through reasonably available information. 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 information which is not protected by applicable privacy legislation.

**"PIPEDA"** means the Personal Information Protection and Electronics Documents Act, as amended from time to time;

**"Policy"** means this Privacy Policy;

**"Privacy Officer"** the WPC Executive Director or their designate;

**"PSO"** refers to a Provincial or Territorial Sport Organization that is responsible for the management of water polo within its provincial or territorial boundaries;

**"Registrants"** means all persons engaged in any paid or volunteer capacity with WPC or a PSO;

**"Responsible Subcommittee"** means as stated on Page 1 of the Policy;

**"UCCMS"** means the Universal Code of Conduct to Prevent and Address Maltreatment in Sport;

**"WPC"** means Water Polo Canada

## **Application**

### Consenting to Terms of Privacy Policy

By providing Personal Information to WPC, individuals are consenting to the use of the information for the purposes identified in this Policy. WPC will not, as a condition of a product or service, require an individual to consent to the collection, use or disclosure of information beyond that required to fulfill the specified purpose.

### Purposes

Personal Information will be collected by WPC to meet and maintain the highest standard of organizing, running, promoting and programming the sport of Water Polo. WPC collects Personal Information of the nature and for such uses and purposes as set forth below:

- Name, address, phone number, cell phone number, fax number and e-mail address for the purpose of communicating information from WPC relating to programs, events, promotions, sponsorship;
- Athlete information including height, uniform size, shoe size, feedback from coaches and trainers, performance results and biography information for outfitting uniforms, media relations and components of team selection;
- Athlete whereabouts information, including sport/discipline, training times and venues, training camp dates and locations, travel plans, competition schedule and disability, if applicable, for Canadian Centre for Ethics in Sport inquiries for the purpose of out-of-competition doping testing;
- NCCP number, education, resumes and experience for database entry at the Coaching Association of Canada to determine level of certification and coaching qualifications;
- Credit card information for purchasing equipment and for registration at leagues, tournaments and other events;
- Date of birth and athlete biography for media releases and to determine age group;
- Banking information and social insurance number for WPC payroll;
- Personal health information including provincial health card numbers (in very limited instances), allergies, emergency contact and past medical history for use in the case of medical emergency;
- Marketing information including attitudinal and demographic data on individual members to determine membership demographic structure and program wants and needs;
- Advertisements - Individuals providing their addresses or e-mail addresses to WPC shall receive advertisements from WPC, an alumni letter, a newsletter and donation request for the purpose of fundraising;
- Detecting and protecting against fraud and error, negligence, breach of contract, theft

- and other illegal activity, and where necessary, to meet our insurance requirements;
- Personal Information reasonably necessary for purposes of determining suitability of team selection;
  - Personal Information reasonably necessary for purpose of determining suitability for carding allocation;
  - Personal Information reasonably necessary for responding to emergencies at tournaments, training and other WPC sponsored events;
  - Communicating with our insurers and professional advisors;
  - For employees of WPC, we will maintain your Personal Information in an employee file, which will be collected and used for the purposes of decision making regarding your hiring, duties, transfer, training, discipline, evaluation, promotion and retention, recording and determining your eligibility for participation in various benefit plans offered by WPC to employees and communicating this information to agents in the course of the performance of a contract or otherwise in our relationship with you;
  - Personal Information reasonably necessary to respond to your questions or concerns, as submitted by you;
  - Personal Information reasonably necessary to allow WPC to provide such information reasonably required by Sport Canada, the Canadian Olympic Committee, Own the Podium and other government funded organizations for purposes of determining funding, sanctions, discipline and other purposes within the mandate of the foregoing organizations; and
  - Personal Information as permitted by, and to comply with the UCCMS, applicable legal or regulatory requirements.

### Personal Information Collected

WPC may collect the following Personal Information: personal registration information shall include name, address, date of birth, gender, club affiliation, SWAD classification (if applicable), aboriginal declaration (if applicable), address, e-mail addresses and telephone numbers. Personal performance information shall include medical history, allergies, injury history, current medications and anthropometric data, as well as such other Personal Information as set forth in this Policy. Personal registration and performance information is entered into electronic databases that seek to maintain accuracy, security and restricted access. Hard copy lists are also kept in a restricted access location at the WPC offices.

Registration and results/rankings databases will be maintained by WPC or a contracted third party for the purpose of athlete registration and athlete results and rankings. Each club's registrar will have access to the database only as it pertains to its own club members. Each provincial section registrar will have access to the database only as it pertains to its provincial registered members. WPC, as the parent organization, will be

able to access the collected personal information of all its registered members. WPC staff access is restricted to the WPC Registrar, and information is made available to WPC staff members only pursuant to the purposes listed above.

Provincial Sections or PSOs in Canada are subsidiaries of WPC for reporting purposes under this Policy. Because PSOs have a more direct relationship with members, PSOs shall obtain the consent of members to collect, and disclose to WPC, Personal Information solely for the purposes identified above.

### Limiting Collection

WPC shall collect, use and disclose the least sensitive personal information reasonably possible to achieve the purposes. All Personal Information will be collected fairly and by lawful means. WPC will not use any form of deception to obtain Personal Information.

### Limiting Use, Disclosure, and Retention

Personal Information will not be used or disclosed by WPC for purposes other than those for which it was collected as described herein, except with the consent of the individual or as otherwise permitted or required by law.

Personal Information will be retained only for the period of time necessary to achieve the purposes and to otherwise comply with WPC's legal and regulatory requirements.

Personal Information that is used to make a decision about an individual will be retained for a minimum of one year, in order to allow the individual access to the information after the decision has been made.

WPC may disclose Personal Information to a government authority that has asserted its lawful authority to obtain the information, where WPC has reasonable grounds to believe the information could be useful in the investigation of an unlawful activity or to comply with a subpoena, warrant or order made by the court, or otherwise as permitted by applicable law.

Documents will be destroyed in a secured manner.

WPC shall use reasonable means to ensure that any third party to whom it discloses personal information shall not use the personal information other than as authorized by WPC and to otherwise protect such information in a manner consistent with the terms set forth herein.

## Accountability

The Executive Director, or their designate (which needs to hold a high-ranking position within WPC), is the Privacy Officer and is responsible for monitoring information collection and data security and ensuring that all staff receive appropriate training on privacy issues and their responsibilities. The Privacy Officer also handles personal information access requests and complaints. The Privacy Officer is WPC's National Operations Officer and may be contacted by contacting WPC's main phone number.

## Accuracy

WPC will use accurate and up-to-date information as is necessary for the purposes for which it is to be used, in order to minimize the possibility that inappropriate information may be used to make a decision about an individual safeguard.

## Security

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. Methods of protection and safeguards include, but are not limited to, locked filing cabinets, restricted access to offices, security clearances, need-to-know access and technological measures including the use of passwords, encryption and firewalls.

## Openness

WPC will publicize information about its policies and practices relating to the management of Personal Information. This information shall be on WPC's website or available upon request by contacting the Privacy Officer.

The information available to the public includes:

- The name or title, address and telephone number of WPC's Privacy Officer;
- The forms that may be used to access Personal Information or change information; and
- A description of the type of Personal Information held by WPC, including a general statement of its approved uses.

## Individual Access

Upon written request, and with assistance from WPC, an individual may be informed of the existence, use and disclosure of their 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 (unless there are reasonable grounds to extend the time limit) at no cost to the individual, or at nominal costs relating to photocopying expenses.

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 in accordance with applicable laws. Upon refusal, WPC will inform the individual the reasons for the refusal.

### Challenging Compliance

An individual may challenge WPC's compliance with this policy and PIPEDA by submitting a challenge in writing to WPC's Privacy Officer.

Upon receipt of a written complaint, WPC will:

- a. Record the date the complaint is received;
- b. Notify the Privacy Officer who will serve in a neutral, unbiased capacity to resolve the complaint;
- c. Acknowledge receipt of the complaint by way of telephone conversation and clarify the nature of the complaint within three days of receipt of the complaint;
- d. Appoint an investigator using WPC personnel or an independent investigator, who will have the skills necessary to conduct a fair and impartial investigation, and who will have unfettered access to all files and personnel, within ten days of receipt of the complaint;
- e. Upon completion of the investigation and within 25 days of receipt of the complaint (unless reasonable circumstances exist for an extension), the investigator will submit a written report to WPC; and
- f. Within 30 days of receipt of the complaint (unless reasonable circumstances exist for an extension), notify the complainant of the outcome of the investigation and any relevant steps taken to rectify the complaint, including any amendments to policies and procedures.

## Responsibility

### **Body**

WPC Membership Services  
Coordinator (Registrar/Privacy  
Officer)

Club Registrars

PSO

### **Action**

Is the appointed designate for overseeing the data collection process and is ultimately accountable for compliance with this policy.

Keep a signed consent form on file for each player

Each PSO shall provide WPC with a signed declaration that the information received has been disclosed with consent for the purposes of WPC.

## **Successors and Assigns**

WPC successors and assigns may collect, use and disclose your Personal Information for substantially the same purposes as described in this Policy.

## **Languages**

This Policy will be provided by WPC in both official languages of Canada.

In this Policy words denoting any gender include all genders and the rest of the sentence is to be construed as if the necessary grammatical changes have been made.

## **References**

PIPEDA or other applicable provincial legislation.  
UCCMS

## **Communication**

WPC will ensure a current version of the Policy is publicized on its organization's website within a reasonable time following the Date of Approval.

WPC and its members will use reasonable efforts to ensure that this Policy is communication to those who will be responsible for upholding it as well as those who will be responsible for its implementation.

## **Review and Approval**

This Policy will be effective as of the Date of Approval following approval by the Board and will be reviewed by the Responsible Subcommittee every two years.