



## Kamloops Long Blades Association

# POLICY G: Privacy and Personal Information Protection Policy

Approved; April 1, 2022

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## Policy G -Privacy and Personal Information Protection Policy

### PREAMBLE

At the Kamloops Long Blades, we are committed to providing our athletes, coaches, officials, volunteers, participants, parents, and other family members of participants with activities related to speed skating. As providing this involves the collection, use and disclosure of some personal information about our athletes, coaches, officials, volunteers, participants, parents, and other family members of participants, protecting their personal information is one of our highest priorities.

While we have always respected our athletes, coaches, officials, volunteers, participants, parents, and other family members of participants' privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information because of British Columbia's Personal Information Protection Act (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how we may collect, use, and disclose personal information.

We will inform our athletes, coaches, officials, volunteers, participants, parents, and other family members of participants of why and how we collect, use, and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Privacy and Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting our athletes', coaches', officials', volunteers', participants', parents', and other family members of participants' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our athletes', coaches', officials', volunteers', participants', parents', and other family members' of participants personal information and allowing our athletes, coaches, officials, volunteers, participants, parents, and other family members of participants to request access to, and correction of, their personal information.

### G-1 POLICY: Collection of Personal Information

1. Unless the purposes for collecting personal information are obvious and the member voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
2. The Club collects Personal Information for the following purposes:
  - a. to verify Members' identity.
  - b. to comply with the requirements of the SSBC and SSC
  - c. to register Members with the Club, the SSBC, and SSC
  - d. to participate in insurance programs offered by the Club, the SSBC, and SSC
  - e. to register Members for competitions, meets, training camps, and social and other Club events
  - f. to send Members Club newsletters, informational bulletins, and other notices

- g. to inform Members regarding practices, meetings, competitions, training camps, and social and other Club events
- h. to create and maintain a Club membership list
- i. to create and maintain a database of Club Members and their skating performances including without limitation competition standings, lap times, personal-best times, race results, and on- and off-ice test results
- j. to inform Club coaches, officials, chaperones, supervisors, and volunteers of potentially relevant medical conditions experienced by Members who participate in practices, competitions, training camps, travel, and other Club activities
- k. to permit Club and other organizers of competitions, meets, and other speed skating activities to register and create lists of competitors or participants and their prior and current competition or participation results
- l. to publish or broadcast, or cause to be published or broadcast in newsletters, other publications, or in the news media the names and photographs of Members and their participation, competition, or meet results
- m. other purposes, the particulars of which will be provided by the Club to Members as and when those other purposes arise.

#### G-2 POLICY: Consent

1. A Member's consent will be obtained before or at the time of collecting Personal Information.
2. Consent may be given orally, in writing, or, in cases where the Member is a Minor, on his or her behalf by his or her guardian.
3. Consent is deemed to have been given to the Club for a purpose if, when consent is deemed to be given, the purpose would be obvious to a reasonable person and the Member voluntarily provides the Personal Information to the Club for that purpose.
4. The purposes for the collection, use, retention, or disclosure of the Personal Information will be provided to the Member when seeking his or her consent. Once consent is obtained from the Member to collect, use, retain, or disclose his or her Personal Information for those purposes, the Club has the individual's implied consent to collect, use, retain, or disclose any supplementary information that is necessary to fulfill the same purposes. The Club will obtain the Member's consent as and when a new purpose is identified.
5. A Member may give limited or partial consent to the collection, use, retention, or disclosure of his or her Personal Information. In that event, the Club will inform the Member of the likely consequences of giving such limited or partial consent.

#### G-3 POLICY: Using and Disclosing Personal Information

1. The Club will collect, use, retain, and disclose Personal Information only for those purposes to which the Member has given consent, subject to exceptions permitted by law.
2. Some of the exceptions permitted by law pursuant to which the Club may collect, use, retain, and disclose Personal Information about a Member without consent are as follows:
  - a. it is necessary for the medical treatment of the Member and the Member is unable to give consent
  - b. the Personal Information is otherwise publicly available
  - c. the Personal Information is collected by observation at sports meet or a similar event at which the Member voluntarily appears and that is open to the public

- d. it is necessary to determine a member's suitability to receive an award, or similar benefit, or to be selected for an athletic purpose
  - e. it is required or authorized by law
  - f. disclosure is for the purpose of complying with a subpoena, warrant, or order issued or made by a court, person, or body of competent jurisdiction disclosure is for the purpose of contacting next of kin or a friend of an injured, ill, or deceased Member
  - g. disclosure is to a lawyer representing the Club
  - h. to facilitate the collection of a debt owed by or to the Club
3. The Club will not sell Personal Information.
  4. Upon giving the Club reasonable notice, a Member may withdraw his or her consent to the collection, use, retention, or disclosure of Personal Information at any time. In that event, the Club will inform the Member of the likely consequences of withdrawing consent.
  5. If a member withdraws consent, the Club will stop collecting, using, retaining, or disclosing his or her Personal Information, subject to the exceptions of Policy G-3.2.

#### G-4 POLICY: Retaining Personal Information

1. The Club will retain Personal Information only for the time it is required for the purposes identified by the Club, following which it will be destroyed. However, due to the Club's continuing exposure to potential claims, some Personal Information may be retained for a longer period.
2. Digital Personal Information will be retained on the Club's Google Drive or SSC's registration portal.

#### G-5 POLICY: Ensuring accuracy of Personal Information

1. The Club endeavours to ensure that Personal Information, as provided by Members and contained in active files, is as accurate, current, and complete as is necessary to fulfil the purposes for which the Personal Information was collected, used, retained, and disclosed.

#### G-6 POLICY: Securing Personal Information

1. Personal Information will be disclosed only to those Club coaches, officials, committees, chaperones, volunteers, and members of the Board who need to know the Personal Information for the purposes of fulfilling their duties and responsibilities to the Club, and only to the extent necessary for the fulfilment of those duties and responsibilities.
2. The records with respect to Personal Information no longer required will be shredded or erased by the Club prior to disposal to prevent inadvertent disclosure to unauthorized persons.
3. Access to the Google Drive containing Personal information is secured by means of two-factor authentication.

#### G-7 POLICY: Providing access to Personal Information

1. A Member who wishes to review or verify what Personal Information is held by the Club with respect to him or her, information about the ways in which the Personal Information has been and is being used by the Club, or to whom the Personal Information has been disclosed, all to the extent permitted by this Policy or by law, may make a request for access, in writing, to the President.

2. Upon verification of the Member's identity, the President will respond to a written request for access within the time limits prescribed by law.
3. If the Member finds that his or her Personal Information retained by the Club is inaccurate or incomplete, upon the Member providing documentary evidence to verify the correct Personal Information, the Club will promptly make the required changes to the individual's active files.

#### G-8 POLICY: Cookies

1. A Cookie is a small text file which gets sent with the pages of a website and stored by the web browser on your computer or other device. The Club uses cookies to offer an additional level of service, resulting in a better experience. Consent is required to store cookies on your computer except for cookies that are used for essential technical or analytical purposes of the Club's website.

#### G-9 POLICY: Links to other websites

1. The Club's website and communications can contain links to other websites or locations. This document is only applicable to the website and services of the Club. Other websites or locations may contain their own privacy policy, therefore KLB recommends you consult these as well.

#### G-10 POLICY: Questions and Complaints

1. The Privacy Officer or designated individual is responsible for ensuring the Club's compliance with this policy and the Personal Information Protection Act.
2. Members should direct any complaints, concerns, or questions regarding the Club's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the member may also write to the President.

Contact information for the Club's Privacy Officer or designated individual as appointed by the KLB Board will be announced each season.

#### G-11 POLICY: Changes to this document

1. The Club changes its policies from time to time to keep them up to date. The most recent version of this document can be found on the Club's website.