
FORT ST JOHN RECREATIONAL & SPEED SKATING CLUB

PRIVACY POLICY

The Fort St John Recreational & Speed Skating Club, is committed to fostering the growth of speedskating. As a club we are involved in the collection, use and disclosure of some personal information about our members and volunteers. Protecting their personal information is one of our highest priorities.

While we have always respected our members' and volunteers' privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result 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 B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our members 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 Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting members' and volunteers personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our members' and volunteers' personal information and allowing our members' and volunteers to request access to, and correction of, their personal information.

Scope of this Policy

This Personal Information Protection Policy applies to the Fort St John Recreational & Speed Skating Club and it's member organizations including BCSSA and SSC and suppliers to our organization.

Definitions

Personal Information – means information about an identifiable *individual including name, age, gender, home address and phone number, social insurance number, medical information and education*. Personal information does not include contact information (described below).

Contact information – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.

Privacy Officer – means the individual designated responsibility for ensuring that the Fort St John Recreational and Speed Skating Club complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

1.1 Unless the purposes for collecting personal information are obvious and the member or volunteer 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.

We will only collect personal and volunteer information that is necessary to fulfill the following purposes:

- To verify identity by collecting the name, home address, home telephone number and birth date of our members' and volunteers;
- To meet the regulatory requirements of BCSSA and SSC if the member is a skater we are required to know the gender and age of the skater as our sport has competitions from time to time separated by gender and age. Therefore we collect information on the gender and age of the skater members;
- To register our members and volunteers with our club, BCSSA and SSC and to participate in the insurance programs offered by them and other such organizations by collecting names, home addresses and home telephone numbers and often times email addresses if available or other contact information;

To register our members for events we will collect names, home addresses, home phone numbers, gender and ages.

- To send out association membership information in the form of newsletters and other information bulletins we collect names, home addresses and email addresses, where available;
- To contact our members and volunteers regarding practices, competitions, meetings and other events we feel our members should be aware of, we collect names, home telephone numbers and email or other contact information such as a fax number;
- To produce a club list of members and volunteers we collect names, home telephone numbers and where possible, email addresses;
- It is necessary for the coaches to know of any medical conditions that may be of consequence in this sport and therefore we collect medical information including Medical Care Card numbers from our skater members; The Medical Care Card Number is also shared with chaperones and others who assume responsibility for supervising the skaters during events, travel and other club activities.
- Organization of competitions requires that the names will appear on posted lists in the competition venues and the results are posted as well.
- Names and pictures may be posted in the notice board, newspapers or other publications including newsletters;
- Alternative contact and medical information will only be used in the case of a medical emergency;

Policy 2 – Consent

2.1 We will obtain member and volunteer consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).

2.2 Consent can be provided orally, in writing, electronically, or through a parent or guardian when the member or volunteer is not of legal age, or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the member or volunteer voluntarily provides personal information for that purpose.

2.3 Consent may also be implied where a member or volunteer is given notice and a reasonable opportunity to opt-out of his or her personal information being used for fund raising, publicity, and other club events and the member or volunteer does not opt-out.

2.4 Subject to certain exceptions (e.g., the personal information is necessary for participation in a club or skating event, or the withdrawal of consent would frustrate the performance of a legal obligation), members and volunteers can withhold or withdraw their consent for the Fort St John Recreational & Speed Skating Club to use their personal information in certain ways. A member or volunteers decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to offer the opportunity to participate in an event. If so, we will explain the situation to assist the member or volunteer in making the decision.

2.5 We may collect, use or disclose personal information without the member's and volunteer's knowledge or consent in the following limited circumstances:

- When the collection, use or disclosure of personal information is permitted or required by law;
- In an emergency that threatens an individual's life, health, or personal security;
- When the personal information is available from a public source (e.g., a telephone directory);
- When we require legal advice from a lawyer;
- For the purposes of collecting a debt;
- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law

Policy 3 – Using and Disclosing Personal Information

3.1 We will only use or disclose member or volunteer personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to our sport such as other skating clubs or supplies of equipment or services that may be of interest.

3.2 We will not use or disclose member or volunteer personal information for any additional purpose unless we obtain consent to do so.

3.3 We will not sell member or volunteer lists or personal information to other parties.

Policy 4 – Retention of Personal Information

4.1 If we use member or volunteer personal information to make a decision that directly affects the member or volunteer, we will retain that personal information for at least one year so that the member or volunteer has a reasonable opportunity to request access to it.

4.2 Subject to policy 4.1, we will retain member or volunteer personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

Policy 5 – Ensuring Accuracy of Personal Information

5.1 We will make reasonable efforts to ensure that member or volunteer personal information is accurate and complete where it may be used to make a decision about the member or volunteer or disclosed to another organization.

5.2 Members or volunteers may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.

A request to correct personal information should be forwarded to the Privacy Officer.

5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the members or volunteers correction request in the file.

Policy 6 – Securing Personal Information

6.1 We are committed to ensuring the security of member or volunteer personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.

6.2 We will use appropriate security measures when destroying members' and volunteers' personal information such as shredding the information and deleting any electronic files.

6.3 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Members and Volunteers Access to Personal Information

7.1 Members and volunteers have a right to access their personal information, subject to limited exceptions which includes when disclosure would reveal personal information about another individual, health, safety concerns and solicitor-client privilege.

7.2 A request to access personal information must be made in writing to the Privacy Officer and provide sufficient detail to identify the personal information being sought.

7.3 Upon request, we will also tell members and volunteers how we use their personal information and to whom it has been disclosed if applicable.

7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.

7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the members and volunteers of the cost and request further direction from the member or volunteer on whether or not we should proceed with the request.

7.6 If a request is refused in full or in part, we will notify the member or volunteer in writing, providing the reasons for refusal and the recourse available to the member or volunteer.

Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual

8.1 The Privacy Officer and Board of Directors for the club ARE responsible for ensuring the Fort St John Recreational & Speed Skating Club's compliance with this policy and the *Personal Information Protection Act*.

8.2 Members and volunteers should direct any complaints, concerns or questions regarding the Fort St John Recreational and Speed Skating Club's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the member or volunteer may also write to the Information and Privacy Commissioner of British Columbia.

The Club Registrar is the Fort St John Recreational & Speed Skating Club's Privacy Officer.

Assistance is also available from the Privacy Officer for BCSSA who can be contacted via the BCSSA office.