

# **GSC Privacy Statement**

The Guelph Skating Club (Club) respects and protects your privacy. In order to provide the programs we offer, the collection and use of personal information is required. We follow the ten privacy principles outlined in the federal governments *Personal Information Protection and Electronic Documents Act.* This Privacy Statement follows these principles and details our commitment to them.

### 1. Accountability

We are responsible for the personal information under our control. Our Privacy Officer oversees our privacy program ensuring our full understanding and adherence to privacy legislation and guidelines.

Our employees have been trained in the proper and respectful use of personal information. Volunteers, coaches, etc. who receive personal information to carry out the work of the organization will be notified about the safekeeping of such information.

### 2. Identifying Purpose of Collection

The Personal Information Protection and Electronic Documents Act (PIPEDA) governs privacy of personal information. Personal information is the information that relates to you as an individual. Personal information does not include business information (an individual's business address and telephone number).

The Club will only collect personal information to meet and maintain the highest standard of organizing and programming the sport of skating. The Club will not sell, exchange, loan or make available to other organizations any personal information that is provided except where required in the normal course of business (i.e., disclosure of registration information to Uplifter).

The Club collects personal information from participants, coaches, officials, team managers, contractors, employees, and volunteers (collectively "individuals") for purposes that include but are not limited to the following:

- 1. Registration for programs, activities, and events; travel administration and purchasing equipment, and other products.
- 2. Receiving communications from the Club regarding fundraising, programs, events, and activities.
- 3. Determining eligibility, age group, and appropriate level of play/competition.
- 4. Criminal record checks and related personal reference material for implementing the GSC Screening Policy.
- 5. Award nominations, biographies, published articles, and media relations.
- 6. Data to determine the level of certification, coaching qualifications, and coach selection.
- 7. Credit card information for purchasing products and for registration at events and activities.
- 8. Technical monitoring, club consultation, officials training, education, sport promotion, media publications and posting on the Club's website, live streaming platforms, event videos, event photographs, social media, displays, or posters.

- 9. Names, ages, and signatures, including electronic signatures, for the purpose of participant agreements, permission where medical treatment is concerned, and collection of waivers.
- 10. The Club's payroll, contractual obligations, bursaries, grants, and honorariums.
- 11. Name and contact information for the purpose of communication within and between board members, committees, volunteers, etc.
- 12. Club and Section contact information: such as Club/Section name, web address, contact person(s) name, phone number, and email address for the purpose of relaying and collecting information relating to the activities of Skate Ontario.
- 13. Emergency contacts, medical history for use in the case of classification, medical emergency or reports relating to medical or emergency issues, and managing insurance claims.
- 14. Determining membership demographic structure, and program wants and needs.

# 3. Consent

- 1. Consent is required to be obtained by lawful means from individuals at the time of collection, prior to the use and 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. The Club will use implied consent when collecting information when reasonable to do so.
- 2. By providing personal information to the Club, individuals are consenting to the use of information for the purposes identified in this policy.
- 3. In determining the type of consent to use, the Club will consider the sensitivity of the information.
- 4. The Club will not, as a condition of a product or service, require an individual to consent to the collection, use, and disclosure of information beyond that required to fulfill the specified purpose.
- 5. An individual may withdraw consent to the collection, use, or disclosure of personal information at any time, subject to legal or contractual restrictions, providing the individual gives one week of notice of such withdrawal to the Club. The Privacy Officer will advise the individual of the implications of such a withdrawal.

#### 4. Limited Collection:

All personal information will be collected fairly, by lawful means, and for the purposes as specified in this policy. The Club will not use any form of deception to obtain personal information.

When you visit the Club's website, we take steps to respect and protect your privacy. We automatically collect generic, non-personal information about visits to our website. The Club does not collect personal information such as names, ages, phone numbers, addresses, or email addresses from visitors to our website. We do collect selected visitor information such as IP addresses, return visits from past guests, referring pages, pages visited, and time spent on the website. This non-personally identifiable information is collected in order to obtain statistical analysis of website traffic patterns, administer our website and servers, and improve our services.

We collect data in aggregate form and data is not recorded or stored about individual visitors.

Cookies are small text files that a web browser transfers to and from your hard drive for record-keeping purposes. The use of cookies is an Internet standard. We may use cookies to serve you better. We do not use cookies to retrieve personal data from your hard drive or to obtain your email address or other personal information. A cookie is information about how and when you use a site, and it is created at the time you visit a site. Rather than retain this data, the club's cookie is a small text file sent to your

computer hard drive to record your preference information on your own computer. Most of our cookies are "session cookies" used only for the time you stay on the website each visit. If you do not wish to accept cookies, you may choose not to by setting your browser options to inform you when cookies are being sent or to deny cookies altogether. Please note, however, that by not accepting cookies, you may limit the functionality that we can provide to you when you visit our site. The Club's website is a product of the Club. The information on the website is provided as a resource to those interested in skating. The Club disclaims any representation, or warranty, express, or implied, concerning the accuracy, completeness, or fitness for a particular purpose of the information. Persons accessing this information assume full responsibility for the use of the information and understand and agree that the Club is not liable for any claim, loss, or damage arising from the use of this information. Reference to specific products, processes, or services does not constitute or imply recommendation or endorsement by the Club. The Club also reserves the right to make changes at any time without notice.

Links to other Internet sites made available through the Club's website are not under the control of the Club and are provided for your convenience only. The Club, therefore, does not guarantee these links and the material available on said sites, nor is the Club responsible for privacy practices by other organizations or websites.

The website is created and controlled by the Club in the province of Ontario. As such, the laws of the province of Ontario will govern these disclaimers, terms and conditions, without giving effect to any principles of conflict of laws.

#### 5. Limiting Use, Disclosure, and Retention

- 1. Personal information will not be used or disclosed by the Club 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.
- 2. Information may be forwarded to volunteers of the organization (such as Committee Members, Board of Directors, Local Organizing Committees, Competition Officials), other associations for the purpose of clinics, programming, and competition, Skate Ontario, Skate Canada, Coaches Association of Ontario, Award organizations, or other parties with whom the Club deals with.
- 3. Information disclosed to a third party with consent from the individual shall be protected by a third-party agreement to limit use and disclosure.
- 4. Personal information will be retained for certain periods of time in accordance with the following:
  - a. Program registration data and athlete information may be retained indefinitely for the sake of historical record and tracking purposes.
  - b. Registration data for programs, clinics, camps, competitions, may be retained indefinitely after the event for record purposes
  - c. Employee information will be retained for a period of seven years in accordance with Canada Customs and Canada Revenue Agency? requirements.
  - d. Personal health information will be immediately destroyed when an individual chooses to leave a Club program.
  - e. Credit Card information will be destroyed immediately upon completion of a financial transaction.
  - f. As otherwise may be stipulated in federal or provincial legislation

#### 6. Accuracy

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

# 7. Safeguards

The Club will keep all personal information confidential, and we will have safeguards to protect that information whether in print, electronic, or other forms. All information held by us is subject to strict internal security to prevent unauthorized access and improper usage. Electronic records are subject to limited access by authorized personnel who must use passwords and other security measures. Print records containing personal information are subject to physical protection such as locked rooms or cabinets, accessible only to authorized personnel.

# 8. Openness

We make information about our privacy program and how we manage your personal information available to you.

#### 9. Individual Access

If you have questions or comments about our policy or would like to review any personal information we have retained about you, please send an email request to <a href="mailto:gfsc.membership@gmail.com">gfsc.membership@gmail.com</a>. Requested information will be disclosed to the individual within ten business days of the receipt of the written request.

### 10. Inquiries and Concerns

Our Privacy Officer can be reached at the above email address. If, having shared your concerns with us, you are still not satisfied with our resolution you may file a complaint with Skate Ontario at complaints@skateontario.org