
British Columbia Ringette Association

Personal Information Protection Policy

At the British Columbia Ringette Association (BCRA), we are committed to providing our members with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our members, protecting their personal information is one of our highest priorities.

While we have always respected our member's 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' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our members' personal information and allowing our members to request access to, and correction of, their personal information.

Scope of this Policy

This Personal Information Protection Policy applies to BCRA and its subsidiaries, local Associations throughout the Province of British Columbia.

This policy also applies to any service providers collecting, using or disclosing personal information on behalf of BCRA.

Definitions

Personal Information – means 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 contact information.

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 BCRA 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 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.

1.2 We will only collect member information that is necessary to fulfill the following purposes:

- a. Name, address, phone number, cell phone number, fax number and e-mail address for the purpose of communicating and reporting about the British Columbia Ringette Association's membership, programs, events and activities.
- b. NCCP number, education, resumes and experience for database entry at the Coaching Association of Canada to determine level of certification and coaching qualifications.
- c. NOCP number, education, resumes and experience for database entry at Ringette Canada to determine level of certification and officiating qualifications.
- d. Date of birth, athlete biography, and member club to determine eligibility, age group and appropriate level of play.
- e. Banking information, social insurance number, criminal records check, resume, and beneficiaries for the British Columbia Ringette Association's payroll, company insurance and health plan.
- f. Criminal records check and related personal reference information for the purpose of implementing the British Columbia Ringette Association's volunteer screening program.
- g. Personal health information including provincial health card numbers, allergies, emergency contact and past medical history for use in the case of medical emergency.
- h. Athlete information including height, weight, uniform size, shoe size, feedback from coaches and trainers, performance results for athlete registration forms, outfitting uniforms, media relations, and various components of athlete and team selection.
- i. 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 purposes of out-of-competition drug testing.
- j. Body weight, mass and body fat index to monitor physical response to training and to maintain an appropriate weight for competition.
- k. Marketing information including attitudinal and demographic data on individual members to determine membership demographic structure, and program wants and needs.

I. 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.
rent payments;

Policy 2 – Consent

- 2.1 We will obtain member 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 by *orally, in writing, electronically, through an authorized representative* or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the member voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a member is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing, fundraising and the, member does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), members can withhold or withdraw their consent for BCRA to use their personal information in certain ways. A member's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the member in making the decision.
- 2.5 We may collect, use or disclose personal information without the member'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 personal information where necessary to fulfill the purposes identified at the time of collection *or for a purpose reasonably related to those purposes such as:*
 - To conduct member surveys in order to enhance the provision of our services;
 - To contact our members directly about services that may be of interest;
- 3.2 We will not use or disclose member personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell member lists or personal information to other parties.

Policy 4 – Retaining Personal Information

- 4.1 If we use member personal information to make a decision that directly affects the member, we will retain that personal information for at least one year so that the member has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain member 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 personal information is accurate and complete where it may be used to make a decision about the member or disclosed to another organization.
- 5.2 Members 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' correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of member personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 The following security measures will be followed to ensure that member personal information is appropriately protected:
- 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.
- The following steps will be taken to ensure security:
- a) Paper information is either under supervision or secured in a locked or restricted area.
 - b) Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers.
 - c) Paper information is transmitted through sealed, addressed envelopes or in boxes by reputable courier/delivery companies.
 - d) Electronic information is transmitted either through a direct line or is encrypted.
 - e) Staff is trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with this policy.
 - f) External consultants and agencies with access to personal information will provide the British Columbia Ringette Association with appropriate privacy assurances
- 6.3 We will use appropriate security measures when destroying member's personal information such as **shredding documents, deleting electronically stored information**].
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Members Access to Personal Information

- 7.1 Members have a right to access their personal information, subject to limited exceptions.
- A full listing of the exceptions to access can be found in section 23 of PIPA. Some examples include: solicitor-client privilege, disclosure would reveal personal information about another individual, health and safety concerns.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Privacy Officer
- 7.3 Upon request, we will also tell members 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 member of the cost and request further direction from the member 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 in writing, providing the reasons for refusal and the recourse available to the member.

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

8.1 The Privacy Officer is responsible for ensuring BCRA compliance with this policy and the *Personal Information Protection Act*.

8.2 Members should direct any complaints, concerns or questions regarding BCRA compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the member may also write to the Information and Privacy Commissioner of British Columbia.

The contact information for BCRA Privacy Officer is:

Executive Director

British Columbia Ringette Association

#420-789 West Pender Street

Vancouver, B.C. V6C 1H2 Fax: 604-629-0876

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