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## **PRIVACY POLICY**

### **Prince George Ringette Association**

#### **1. Purpose**

PGRA will handle private information with care for the benefit and protection of our Members. This policy outlines how privacy of personal information will be ensured by PGRA.

#### **2. Scope**

This policy applies to all personal information collected by the PGRA.

#### **3. Definitions**

- a) Member: Any class of Member of the Prince George Ringette Association, including the parents of Members under 19 years old.
- b) Minor: a person under the age of 19 years;
- c) Privacy Officer: the person designated by the Board of Directors to ensure that the PGRA complies with this policy.
- d) Personal Information: Information about an identifiable individual including without limitation her name, age, gender, home address, home telephone number, email address, Personal Health (Care Card) Number, and medical information.

#### **4. Principles**

The principles that form the basis of this policy are as follows:

- a) Accountability: PGRA is accountable for the Personal Information it collects, uses, retains, and discloses in the course of its activities including without limitation the designation of a Privacy Officer.
- b) Identifying Purpose: PGRA will explain the purposes for which the information is being collected, used, retained, and disclosed at the time of collection, unless those purposes are obvious.
- c) Consent: PGRA must obtain a Member's expressed or implied consent when it collects, uses, retains, or discloses the Member's Personal Information.
- d) Limiting Collection, Use, Retention, Disclosure: Personal Information must be collected, used, disclosed, and retained only for the identified purposes unless the Member consents otherwise or as otherwise permitted by law.
- e) Accuracy: PGRA is required to keep Personal Information in active files accurate

and current.

- f) Safeguards: PGRA is to use physical, organizational, and technological safeguards to protect Personal Information from unauthorized access or disclosure.
- g) Openness: PGRA must inform its Members about its privacy policies and procedures.
- h) Individual Access: A Member has the right to gain access to his or her Personal Information held by PGRA and to challenge its accuracy if need be.
- i) Provide Recourse: PGRA is to inform its Members of how to bring a request for access or a complaint to the Privacy Officer, and to respond reasonably promptly to a request or a Complaint by a Member.

## **5. Purposes of Collecting Personal Information**

PGRA collects Personal Information for the following purposes:

- a) To verify Members' identity;
- b) To comply with the requirements of BCRA and Ringette Canada;
- c) To register Members with the Association, BCRA and Ringette Canada;
- d) To participate in insurance programs offered by PGRA, BCRA and Ringette Canada;
- e) To register Members for competitions, tournaments, training camps and social or other events;
- f) To send Members Club newsletters, informational bulletins, and other notices;
- g) To inform Members regarding practices, games, competitions, training camps, and other social and Ringette events;
- h) To create and maintain a Membership list and data base of Members;
- i) To inform PGRA coaches, officials, chaperones, supervisors, volunteers of potentially relevant medical conditions experienced by Members who participate in practices, games, tournaments, training camps, travel and other activities;
- j) To permit PGRA and other event organizers to register and create lists of competitors, and to publish or broadcast, or cause to be published or broadcast, the names and photographs of Members and their participation in competitive events;
- k) Other purposes, the particulars of which will be provided by the PGRA to Members as and when those purposes arise.

## **6. Consent**

A Member's consent will be obtained before or at the time of collecting Personal Information. 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.

Consent is deemed to have been given to PGRA for a purpose if, when consent is deemed to be given, the purpose would be considered to be obvious to a reasonable person and the Member voluntarily provides the Personal Information to PGRA for that

purpose.

The purposes for the collection, use, retention, or disclosure of the Personal Information will be provided to the Member to collect, use, retain, or disclose 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, PGRA has the individual's implied consent to collect, use, retain, or disclose any supplementary information that is necessary to fulfill the same purposes. PGRA will obtain the Member's consent as and when a new purpose is identified.

A Member may give limited or partial consent to the collection, use, retention, or disclosure of his or her personal information. In that event, PGRA will inform the Member of the likely consequences of giving such limited or partial consent.

## **7. Limiting Collection, Use, Retention, and Disclosure**

PGRA 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.

- a) Some of the exceptions permitted by law pursuant to which PGRA may collect, use, retain, and disclose Personal Information about a Member without consent are as follows:
- b) It is necessary for the medical treatment of the Member and the Member is unable to give consent;
- c) The Personal Information is otherwise publicly available;
- d) The Personal Information is collected by observation at a PGRA event in which the Member voluntarily appears (scoring statistics, for instance);
- e) It is necessary to determine a Members' suitability to receive an honour, award or similar benefit, or to be selected for athletic purposes;
- f) It is required or authorized by law, including without limitation complying with a subpoena, warrant, or order issued or made by a court, person, or body of competent jurisdiction;
- g) Disclosure is for the purpose of contacting next of kin or a friend of an injured, ill, or deceased Member;
- h) Disclosure is to a lawyer representing PGRA; or
- i) To facilitate collection of a debt owed by or to PGRA.

PGRA will not sell personal information.

Upon giving PGRA 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, PGRA will inform the Member of the likely consequences of withdrawing consent.

If a Member withdraws consent PGRA will stop collecting, using, retaining, or disclosing her Personal Information unless the collection, use, retention, or disclosure without consent is permitted by law.

PGRA will retain personal information only for the time it is required for the purposes identified by the PGRA, following which it will be destroyed. However, due to PGRA's continuing exposure to potential claims, some Personal Information may be retained for a longer period.

### **8. Accuracy**

PGRA 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 fulfill the purposes for which the Personal Information was collected, used, retained, and disclosed.

Members are asked to notify PGRA of any change in Personal Information.

Personal Information contained in PGRA's active files is not updated.

### **9. Safeguards**

Personal Information will be disclosed only to those PGRA coaches, officials, committees, chaperones, supervisors, volunteers, and Board Members who need to know the Personal Information for the purposes of fulfilling their duties and responsibilities to the PGRA, and only to the extent necessary for the fulfilment of those duties and responsibilities.

The records with respect to Personal Information no longer required will be shredded or erased by PGRA to prevent inadvertent disclosure to unauthorized persons.

### **10. Openness**

The club will endeavour to make its privacy policies and procedures known to Members via this Privacy Policy. The current version of this policy is available upon request from Members of the Board.

### **11. Individual Access**

A Member who wishes to review or verify what Personal Information is held by PGRA with respect to him or her, information about ways in which the Personal Information has been and is being used by PGRA, 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 Privacy Officer.

Upon verification of the Member's identity, the Privacy Officer will respond to a written request for access within the time limits prescribed by law.

PGRA may, at its sole discretion, charge a Member a minimal fee for access to his or her Personal Information provided that it gives the Member in advance a written estimate of the fee and the Member then instructs PGRA to respond to his or her request. PGRA may require the Member to pay in advance for all or part of the fee.

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, PGRA will make promptly the required changes to the active files.

PGRA is not required to disclose Personal Information where the Personal Information is protected by solicitor-client privilege.

## **12. Complaints or Recourse**

If a Member has a concern about PGRA's Personal Information handling practices, a complaint, in writing, may be directed to the Privacy Officer.

Upon verification of the Member's identity, the Privacy Officer will act promptly to investigate the complaint and provide a written report of the investigations findings to the Member.

Where the Privacy Officer makes a determination that the Member's complaint is well-founded, the Privacy Officer will take the necessary steps to correct the offending information-handling practice and/or to revise PGRA's Privacy Policy and procedures.

Where the Privacy Officer determines that the Member's complain is not well founded, the Member will be notified in writing.