

British Columbia Amateur Hockey Privacy Policy

The *Personal Information Protection Act* ("the Act") regulates the way private sector organizations within British Columbia collect, use, keep, secure and disclose personal information. "Personal Information" means all information about an identifiable individual. The British Columbia Amateur Hockey Association ("BCAHA") recognizes the importance of privacy and recognizes the sensitivity of personal information received by us in the course of governing amateur hockey in British Columbia and Yukon Territory.

We recognize our obligation to maintain the confidentiality of our member's information, and recognize our obligations concerning the personal information of all individuals that we collect, use or disclose. This policy has been developed with those obligations in mind.

1 Accountability

- 1.1 BCAHA will appoint a staff person (the "Privacy Officer") whose responsibilities will include those of the implementation and monitoring of this Privacy Policy. The Privacy Officer will be responsible for BCAHA's compliance with privacy principles. This person will also be responsible for responding to access requests in accordance with this Policy. The Privacy Officer will report to the Executive Director. The ultimate responsibility for Privacy issues will rest with the BCAHA Board of Directors. The Privacy Officer may at his/her discretion enlist assistance from other staff members and/or volunteers within the organization. This will not in any manner mitigate his/her responsibility for Privacy issues.
- 1.2 The Privacy Officer's identity will be fully disclosed and publicly accessible to BCAHA members and the public in general. BCAHA's Privacy Officer is Jeremy Ainsworth who can be reached at privacy@bchockey.net.
- 1.3 BCAHA's Privacy Officer will ensure that BCAHA manages all personal information in its possession in accordance with this Policy including that which may be transferred to a third party. Third party organizations who handle information on behalf of BCAHA will be contractually obligated to adhere to the standards of BCAHA.
- 1.4 BCAHA will implement internal policies which will facilitate adherence to this Privacy Policy including but not limited to the following:
 - 1.4.1 Security measures at all levels designed to protect personal information in our possession;
 - 1.4.2 Implementing procedures designed to respond to complaints and/or inquiries.
 - 1.4.3 Staff training in all facets of information management, including awareness of BCAHA's Privacy Policy and policies and procedures developed in accordance with the Policy.

2 Identifying Purposes, Type of Information Collected and Website

- 2.1 BCAHA will only collect the information reasonably necessary to conduct BCAHA Programming. Access to our privacy policies and procedures will be readily available. Similarly, the process by which challenges may be made to BCAHA's compliance and/or adherence to the legislation in question will be readily available and transparent. To obtain further information, contact BCAHA's Privacy Officer.

- 2.2 BCAHA collects personal information from prospective members, members, coaches, referees, managers and volunteers for the purposes of conducting Hockey Programming. Specifically:
- A player's name, address and date of birth are collected to determine that the player's geographical, division of play and level of play information are consistent with BCAHA regulations.
 - Historical information concerning past teams played for is collected in order to determine if any transfer regulations may apply.
 - Information concerning an individual's skill level and development and feedback on programs is collected to measure the success of our programs in order that we may better plan future programs.
 - Information as to a player's parents' name, address, telephone numbers and email addresses may be collected in order to facilitate emergency contact information as well as to ensure compliance with BCAHA residency regulations.
 - Educational information may be collected in order to ensure all BCAHA residency regulations have been adhered to.
 - E-mail addresses may be collected for the purposes of facilitating membership communication related to upcoming events and programs. Information about skill levels, ability, emergency contacts and health to ensure our activities are carried out in a safe and secure environment.
 - Personal information collected for the purposes of hockey registrations may also be used for hockey specific research purposes including but not necessarily limited to hockey demographic type research.
 - Affiliates. BCAHA has numerous organizations which offer hockey programs under the auspices of BCAHA. BCAHA discloses the personal information described in paragraph 2.2 to these organizations in order to facilitate Hockey Programming and ensure compliance with rules and regulations.
 - Potential and actual insurance claims and the subsequent investigation thereof.
 - Appeals and regulations challenges as well as information collected to defend BCAHA against legal action brought against BCAHA.
- 2.3 BCAHA will endeavour through its member Branches, associations/leagues to advise potential registration candidates of the purpose for the collection of the data requested at the time of registration or by reference to our web site at www.bchockey.net We will further endeavour to ensure that all collectors of the personal information are familiar with the potential use of the personal data.
- 2.4 BCAHA will request permission for the use of any personal data collected which is extraneous to that which has been identified above, unless such use is authorized by law.
- 2.5 BCAHA may also use information about an individual who accesses secure areas of www.bchockey.net. Information requested during use of our web site may include name, address, e-mail address, age, sex [and the other types of personal information listed in paragraph 2.2]. All such personal information will be treated within the same parameters as other personal information collected by BCAHA through other means. Whether or not to

provide the information collected will be entirely at the discretion of the user; however failure to complete certain sections may inhibit the ability to fully access all areas of the web site. Our web site also collects non-identifiable information about users such as the users IP address, the sections of the web site visited and the information downloaded. BCAHA may use this non-identifiable information and disclose it to service providers, for system administration purposes and to improve the web site.

3 Consent

3.1 BCAHA will use the personal information for the uses specified above in section 2 and in Sections 3.2 and 3.3 below. By consenting to provide your information to BCAHA, you are deemed to consent to our use of the information for the purposes of Hockey Programming listed in Section 2 of this Privacy Policy and to disclosure of the information to other associated organizations for the same purpose.

3.2 In addition to using personal information for Hockey Programming purposes, BCAHA may from time to time wish to use member name, address and contact information for the purposes of providing promotional opportunities, including by providing the information to BCAHA's branches, leagues and associations and other third parties who BCAHA believes provide services or goods that may be of interest to you. BCAHA and any such third parties may contact you to with promotions [or to provide further hockey specific communications and association/league Branch information updates]. BCAHA will provide an opportunity for the member to consent to these opportunities during the registration process. If you consent but later wish to opt out of this use of information later, you may do so by contacting us as described at Section 3.4 below.

3.3 BCAHA recognizes that hockey by its nature is a contact sport and injuries are to a certain extent inherent in the game. We believe medical records, medical history and medical forms of the individual may be of assistance in an emergency situation and therefore we may request them. While our members and prospective members are under no obligation whatsoever to supply this information and may refuse to do so without penalty, BCAHA will consider receipt of this information as consent for its subsequent use in an emergency medical situation.

3.4 If at any time you wish to withdraw your consent to the use of your information for any purposes, you may do so by contacting the Privacy Officer for BCAHA. We will do our best to accommodate your request in a timely fashion without diminishing the services we provide to you. We will explain to you the impact of your withdrawal on any services we provide to you.

3.5 BCAHA may collect personal information without consent where reasonable to do so and where permitted by law.

4 Limiting Collection

- 4.1 All information will be collected fairly and lawfully within the criteria as set forth in our Privacy Policy.
- 4.2 BCAHA will not indiscriminately collect information. The amount and type of information we collect will be limited to that which is required to fulfill our identified purposes.
- 4.3 BCAHA will not use any form of deception in gaining personal information from its members.

5 **Limiting Use, Disclosure and Retention**

- 5.1 Subject to applicable legislation, BCAHA will limit use of personal information it collects to purposes that we have disclosed in Sections 2 (Identifying Purposes) and 3.2, Consent.
- 5.2 BCAHA will maintain documents for certain periods of time depending upon necessity. More specifically:
 - We will normally maintain registration data for a three period after an individual has left our programs in the event that an individual chooses to return to our programs after leaving.
 - Parental/family information will be normally maintained for a similar three year period after a member has left our programs.
 - Affiliates. BCAHA has numerous organizations which offer hockey programs under the auspices of BCAHA. As explained above, BCAHA may from time to time share information with these Branches, associations, and leagues in order to facilitate Hockey Programming and ensure compliance with rules and regulations.
 - BCAHA may from time to time enlist the services of third party vendors in order to provide hockey programs, technical and support services. Prior to enlisting the services of these firms we will contractually commit them to treat your personal information consistent with the Privacy Policy of BCAHA.
 - BCAHA may at some point be involved in the sale, merger, transfer or reorganization of its activities. We may disclose personal information to the other party in such a transaction. BCAHA will ensure that we contractually obligate the other party to treat this information in a manner consistent with our Privacy Policy.
 - BCAHA may disclose your personal information to a government authority that has asserted its lawful authority to obtain the information or where BCAHA has reasonable grounds to believe the information could be useful in the investigation of an unlawful activity, or to comply with a subpoena or warrant or an order made by the court, person, or body with jurisdiction to compel the production of the information or otherwise as permitted by applicable law.
 - BCAHA may at its discretion release personal information for the purposes of collecting debts which may be owed to BCAHA.
- 5.3 Certain documents may be subject to legislated retention periods either federally or provincially and these will be respected at all times by BCAHA.

6 **Accuracy**

- 6.1 BCAHA will strive to ensure to the extent it can that the information entrusted to us is maintained in an accurate manner. We will try to maintain the interests of the individual and attempt to ensure that decisions are not made for or about an individual based on personal information that is flawed.
- 6.2 BCAHA will only update information in the event of a renewal or registration and/or an update.

7 **Safeguards**

- 7.1 Security safeguards have been implemented to ensure your personal information is protected from theft as well as unauthorized access, disclosure, copying, use or modification.
- 7.2 The level of safeguards employed will be directly related to the level of sensitivity of the personal information collected. The more sensitive the information, the higher the level of security employed.
- 7.3 Methods of protection and safeguards to be employed will include but in no way be necessarily limited to locked files, offices and storage areas, security clearances and need to know access as well as technological measures such as passwords and encryption.

8 **Openness**

- 8.1 BCAHA publicly discloses the methods by which we handle your personal information. This information is readily available through our Privacy Policy, on our web site or upon request by contacting the BCAHA Privacy Officer.
- 8.2 The information available includes:
- The name address and phone number of the BCAHA Privacy Officer.
 - The forms which you may use to access your information or change your information.
 - A description of the type of personal information held by BCAHA and our general uses thereof. This includes:
 - registration information, including name, date of birth, address, past teams played on, medical information and e-mail addresses;
 - information used for scouting, potential sponsorship opportunities, donors, alumni and information retained for the purposes of BCAHA business contacts; and
 - information that may be made available to related organizations, branches, associations, leagues and/or third party service providers, in accordance with the provisions of this Privacy Policy.

9 **Individual Access**

- 9.1 Subject to applicable legislation, upon request by the individual concerned, BCAHA will disclose whether or not it actually holds personal information on an individual. We will disclose the source of this information when requested and provide an account of third parties to whom the information may have been disclosed.
 - 9.2 BCAHA may request sufficient information to confirm your identity before releasing your personal information to you.
 - 9.3 Subject to applicable legislation, BCAHA will endeavour to provide this information within 30 days of receipt of the information requested and may charge nominal fees for the purpose of off-setting its expenses incurred in supplying the requested information. This information will be provided in an understandable format.
 - 9.4 Any inaccurate information that is brought to our attention will be corrected by BCAHA as quickly as possible and any pertinent third parties will be apprised of the corrections in due course.
- 10 **Challenging Compliance**
- 10.1 BCAHA has in place procedures for the resolution of grievances in the administration of its Privacy Policy.
 - 10.2 Upon receipt of a complaint BCAHA will make available the complaint procedures which will be simple and easy to access.
 - 10.3 BCAHA will investigate all complaints. If the complaint is deemed justified BCAHA will take the appropriate steps to ensure that compliance is achieved and will make changes to its policies to allow for compliance in the future.
 - 10.4 All complaints and further requests for information regarding BCAHA's privacy policies should be addressed to the BCAHA Privacy Officer.