



### Richmond Rockets Speed Skating Club - PRIVACY POLICY

#### Definitions

1. In this Policy:

“**BCSSA**” means the British Columbia Speed Skating Association;

“**Board**” means the Board of Directors of the Richmond Rockets Speed Skating Club;

“**Club**” means the Richmond Rockets Speed Skating Club;

“**Member**” means any class of member of the Richmond Rockets Speed Skating Club, and where a Member is under 19 years of age includes the Member’s legal guardians;

“**Minor**” means a person under the age of 19 years;

“**Personal Information**” means information about an identifiable individual including without limitation his or her name, age, gender, home address, home telephone e-mail address, Personal Health (Care Card) Number, medical information, race results, on- and off-ice test results, seed times, and rankings;

“**Privacy Officer**” means the person designated by the Board to ensure that the Club complies with this Policy.

“**SSC**” means Speed Skating Canada.

#### Principles

2. The principles that form the basis of this Policy are as follows:

(a) **Accountability.** The Club 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 Purposes.** The Club 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.** The Club must obtain a Member’s express or implied consent when it collects, uses, retains, or discloses the Member’s Personal Information;

(c) **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.** The Club is required to keep Personal Information in active files accurate and current;

(f) **Safeguards.** The Club is to use physical, organizational, and technological safeguards to protect Personal Information from unauthorized access or disclosure;



- (g) Openness. The Club must inform its Members about its privacy policies and procedures;
- (h) Individual Access. A Member has a right to gain access to his or her Personal Information held by the Club and to challenge its accuracy if need be;
- (i) Provide Recourse. The Club 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.

### **Purposes of Collecting Personal Information**

3. The Club collects Personal Information for the following purposes:

- (a) to verify Members' identity;
- (b) to comply with the requirements of the BCSSA and SSC;
- (c) to register Members with the Club, the BCSSA, and SSC;
- (d) to participate in insurance programs offered by the Club, the BCSSA, and SSC;
- (e) to register Members for competitions, meets, training camps, and social and other Club events;
- (f) to send Members Club newsletters, informational bulletins, and other notices;
- (g) to inform Members regarding practices, meetings, competitions, training camps, and social and other Club events;
- (h) to create and maintain a Club membership list;
- (i) to create and maintain a data base of Club Members and their skating performances including without limitation competition standings, lap times, personal-best times, race results, and on- and off-ice test results;
- (j) to inform Club coaches, officials, chaperones, supervisors, and volunteers of potentially relevant medical conditions experienced by Members who participate in practices, competitions, training camps, travel, and other Club activities;
- (k) to permit Club and other organizers of competitions, meets, and other speed skating activities to register and create lists of competitors or participants and their prior and current competition or participation results;
- (l) to publish or broadcast, or cause to be published or broadcast in newsletters, other publications, or in the news media the names and photographs of Members and their participation, competition, or meet results; and
- (l) other purposes, the particulars of which will be provided by the Club to Members as and when those other purposes arise.



### **Consent**

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

5. 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.

6. Consent is deemed to have been given to the Club 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 the Club for that purpose.

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

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

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

9. The Club 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.

10. Some of the exceptions permitted by law pursuant to which the Club may collect, use, retain, and disclose Personal Information about a Member without consent are as follows:

(a) it is necessary for the medical treatment of the Member and the Member is unable to give consent;

(b) the Personal Information is otherwise publicly available;

(c) the Personal Information is collected by observation at a sports meet or a similar event at which the Member voluntarily appears and that is open to the public;

(d) it is necessary to determine a Member's suitability to receive an honor, award, or similar benefit, or to be selected for an athletic purpose;



(e) it is required or authorized by law;

(f) disclosure is for the purpose of 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 the Club; or

(i) to facilitate the collection of a debt owed by or to the Club.

11. The Club will not sell Personal Information.

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

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

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

### **Accuracy**

15. The Club endeavors 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.

16. Members are asked to notify the Club of any change in Personal Information.

17. Personal Information contained in the Club's inactive files is not updated.



### **Safeguards**

18. Personal Information will be disclosed only to those Club coaches, officials, committees, chaperones, volunteers, and members of the Board who need to know the Personal Information for the purposes of fulfilling their duties and responsibilities to the Club, and only to the extent necessary for the fulfillment of those duties and responsibilities.

19. The records with respect to Personal Information no longer required will be shredded or erased by the Club prior to disposal to prevent inadvertent disclosure to unauthorized persons.

### **Openness**

20. The Club will endeavor 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 a member of the Board.

### **Individual Access**

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

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

23. The Club 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 the Club to respond to his or her request for access. The Club may require the Member to pay in advance a deposit for all or part of the fee.

24. 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, the Club will make promptly the required changes to the individual's active files.

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



### Complaints or Recourse

26. If a Member has a concern about the Club's Personal Information-handling practices, a complaint, in writing, may be directed to the President.

27. Upon verification of the Member's identity, the President will act promptly to investigate the complaint and provide a written report of the investigation's findings to the Member.

28. Where the President makes a determination that the Member's complaint is well-founded, the President will take the necessary steps to correct the offending information-handling practice and/or to revise the Club's privacy policies and procedures.

29. Where the President determines that the Member's complaint is not well founded, the Member will be notified in writing.

\_\_\_\_\_  
Skater's

\_\_\_\_\_  
Parent/Guardian

Date: \_\_\_\_\_

Date: \_\_\_\_\_