

Section	HR/Social
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Approved	Aug 2022

Privacy Policy

The Surrey Knights Swim Club is committed to providing our members with exceptional service. While the SKSC Organization respected our members' 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 or the "Act"). *PIPA sets out the ground rules for how B.C. organizations may collect, use, and disclose personal information.*

SKSC will inform our members of why and how we collect, use, and disclose their personal information, obtain their consent where/when required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances. This *Privacy Policy*, in compliance with PIPA, outlines the principles and practices we will follow in protecting members' personal information.

Scope of this Policy

This *Privacy Policy* applies to the SKSC Organization and its membership. This Policy also applies to any service providers collecting, using, or disclosing personal information on behalf of the SKSC. 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.

1. Definitions

Terms in this Policy are defined as follows:

- a) **Personal Information** – means information about an identifiable *individual*. Personal information does not include contact information (described below).
- b) **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.
- c) **Member** – means a registered swimmer, swimmers' parent, coach, official, volunteer or Board member.
- d) **Organization**: Refer to Surrey Knights Swim Club, Knight Swim Club, SKSC or Knights
- e) **PIPA** - *Personal Information Protection Act of British Columbia* (PIPA or the "Act")

2. Collecting Personal Information

- a) Unless the purposes for collecting personal information are obvious and the member voluntarily provides their 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.
- b) We will only collect member information that is necessary to fulfill the following purposes:
 - To verify identity
 - For registration with Swim BC and Swimming Canada
 - To ensure swimmers compete in age-appropriate environments
 - To establish athlete eligibility for selection to teams

- To establish pertinent baseline performance data to assist coaching decisions in a competitive or training setting
- To report non-identifying, demographic and participation statistics to funders, sponsors and other authorized third parties
- To report and publish athletes' names, genders, ages, club affiliations on the Organization's website or in results, news releases and ranking reports
- To make direct contact with registrants, volunteers, and staff as necessary for the operation of the Organization
- To send out association membership information

3. **Consent**

- a) The Organization will obtain member consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- b) Consent can be provided electronically, 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.
- c) Consent may also be implied where a member is given notice and a reasonable opportunity to opt-out of their personal information being used for communications and the member does not opt-out.
- d) Subject to certain exceptions (e.g., the personal information is necessary to provide the registration and competition entry, and results ranking service, or the withdrawal of consent would frustrate the performance of a legal obligation), members can withhold or withdraw their consent for the Organization 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. If so, we will explain the situation to assist the member in making the decision.
- e) The Organization may collect, use, or disclose personal information without the member's 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
- f) The Organization may use or disclose personal information where personal information collected from or on behalf of another organization without the consent of the individual to whom the information relates, if
 - the individual consented to the use of the personal information by the other organization,
 - the personal information is used by the Organization solely for the purposes for which the information was previously collected, and
 - to assist that organization to carry out work on behalf of the other organization.

4. **Using and Disclosing Personal Information**

- a) SKSC will only use or disclose member personal information where necessary to fulfill the purposes identified at the collection of, or within this policy.
- b) SKSC will not use or disclose member personal information for any additional purpose unless we obtain consent to do so.
- c) SKSC will not sell member lists or personal information to other parties unless we have consent to do so.

5. Retaining Personal Information

- a) If the SKSC uses 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.
- b) Subject to 5 (a) above, we will retain member personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

6. Ensuring Accuracy of Personal Information

- a) The Organization 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. (example - birth certificate for proof of age)
 - i. 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 SKSC Registrar.
 - ii. 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.

7. Securing Personal Information

- a) The following security measures will be followed to ensure that member personal information is appropriately protected:
 - physically securing offices where personal information is held,
 - the use of user IDs, passwords, encryption, firewalls; restricting employee access to personal information as appropriate
 - the Club registrar will have access to the database only as it pertains to club registrants. The Swim BC registrar will have access to the database only as it pertains to provincial registrants' members. Swimming Canada as the parent organization will be able to access the collected personal information of all registrants. Full system access is restricted to the CEO, Swimming Canada Registrar, and Information Technology Manager. Information is made available to additional staff members, or the Organization members pursuant to the purposes listed above.
- b) The Organization will use appropriate security measures when destroying member's personal information such as shredding documents and deleting electronically stored information.
- c) The Organization will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

8. Providing Members Access to Personal Information

- a) Members have a right to access their personal information, subject to limited exceptions.
- b) A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.
- c) Upon request, we will also tell members how we use their personal information and to whom it has been disclosed if applicable.
- d) The Organization 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.
- e) 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.

9. Questions and Complaints: The Role of the Privacy Officer or designated individual



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- a) Members should direct any complaints, concerns, or questions regarding the Organization's compliance in writing to the Club Registrar and copied to the Club President . If the Club Registrar/ Club President is unable to resolve the concern, the member may also write to the Information and Privacy Commissioner of British Columbia.