

## PRIVACY

### Policies

- 1.1. The Northwest Privacy Policy describes how Northwest collects, uses, retains, safeguards, discloses and disposes of the personal information of all members and participants. See [Appendix G](#) for further details.

## APPENDIX G – Privacy Policy

This privacy policy describes the ways in which the Association collects, uses, retains, safeguards, discloses and disposes of the personal information of all Northwest members and participants.

### Principle 1 - Accountability

The Association hereby designates the Registrar as the person who will be accountable to the Board for compliance with this policy. The Registrar will be responsible for responding to access requests, corrections and complaints in accordance with this policy.

The Registrar shall ensure that the Association is accountable for all personal information in its possession including that which may be transferred to a third party. Third party organizations that handle information on behalf of the Association shall be obligated to adhere to the standards of this policy.

The Association shall take all steps necessary to ensure compliance with this policy including security measures designed to protect personal information in its possession and staff training in all facets of information management.

### Principle 2 - Identifying Purposes

NWCR ringette programming involves governing its teams and games including training of coaches and determining players' eligibility for specific divisions. NWCR is also responsible for establishing appropriate policies and regulations to ensure appropriate governance of the Association. NWCR shall only collect personal information for the purpose of providing such ringette programming.

The Association collects personal information for the following specific purposes:

#### Type of Personal Information Purpose of Collecting

A player's name, gender, place of residence and date of birth.	To determine that the player's geographical, division and level of play information are consistent with Ringette Canada, Ringette Alberta and Ringette Calgary regulations. To be made available to related organizations and leagues for purposes of competition.
Historical information concerning past teams played for.	To determine if any transfer regulations apply.
A player's skill and development level and feedback on programs and awards received.	To measure the success of the Association's programs and maintain governance.
A player's parents or guardian's names, addresses, telephone numbers and e-mail addresses.	To facilitate emergency contact information. To ensure compliance with residency regulations. To facilitate membership communication.

Team official's names, addresses, telephone numbers, e-mail addresses, training and coaching certifications and qualifications.	To facilitate membership communication and communications amongst other team officials and other minor ringette organizations. To certify team officials.
Police Checks, VSS Search	To help ensure the safety of participants

Educational information	To ensure all residency regulations have been adhered to.
Skill levels, ability, emergency contacts and health concerns	To ensure all Association activities are carried out in a safe and secure environment.
Team and individual pictures	To provide players with a memento of their ringette experience
Resumes (if necessary)	To determine a prospective employee's suitability for a position within the Association.
Appeal Information	To administer appeals and any related proceedings, and the rules, regulations and by-laws of the Association, Ringette Canada, Ringette Alberta and Ringette Calgary.
Coaching Applications	To determine a prospective head coach's suitability to coach a NWCR team.
Parent and Player Satisfaction Surveys	To help evaluate the suitability of a head coach/assistant coach to return as head/assistant coach. To help determine whether any other team official should be placed to a team. To provide feedback to head/assistant coach or team personnel.
Player Evaluations	To help balance league teams.

The Association shall request individual permission to use any personal information for purposes other than those identified in section 2 above unless such usage is authorized or required by law.

The Association shall advise registration candidates of the purposes for the collection of their personal information at the time of registration by reference to this policy.

Where practicable, all personal information collected by the Association shall be maintained within the Northwest office's, Office of the Registrar and/or office of the President.

The Association may require that personal information be provided to gain access to secure areas of the Northwest website. Any information so provided will be treated within the same parameters as other personal information collected by the Association through other means. It will always re-main the user's choice to provide information in certain fields.

### Principle 3 - Consent

All members of the Association agree that the act of registering constitutes implied consent to the use

personal information for the purposes specified in section 2.

While participants are under no obligation whatsoever to supply medical records, medical history or medical forms and may refuse to do so without penalty, the Association will consider receipt of this information as consent for its subsequent use in an emergency medical situation.

If at any time any person wishes to withdraw consent to the use of his or her personal information for any purpose, the person may do so by notifying the Registrar in writing.

In exceptional circumstances, the Association may collect, use and disclose personal information without consent where it is both necessary and reasonable to do so and where permitted by law.

#### **Principle 4 - Limiting Collection**

1. The Association shall only collect personal information by fair and lawful means. The Association shall not indiscriminately collect information. Both the amount and type of information collected shall be limited to that which is required to fulfill the purposes identified in section 2 and such other purposes as are reasonably related to the objectives of the Association.

#### **Principle 5 - Limiting Use, Disclosure and Retention**

The Association shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the person to whom the information relates or as required by law.

No personal information shall be supplied to third party service providers or product suppliers without the consent of the person to whom the information relates.

The Association may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where the Association 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 authorized or required by law.

If any NWCR team has collected personal information from its players, parents or team officials, it must adhere to the principles set out in this policy. Specifically, no NWCR team may use or disclose personal information supplied to it directly or by the Association for purposes other than those set out in section 2 without the consent of the person to whom the information relates. This includes the disclosure of personal information on any web page.

The Association may release personal information for the purpose of collecting debts that are owed to the Association.

Personal information shall only be retained as long as is necessary to fulfill the purpose identified unless consent is given to keep information for a longer period of time.

Registration data shall be retained for a three-year period after a player has left the Association.

Parental/family information shall be maintained for a similar three-year period after a member has left the Association.

Personal information that is no longer required or permitted to be retained by the Association will be destroyed in a secure manner.

#### **Principle 6 - Accuracy**

The Association shall strive to ensure, to the extent that it can, that the information entrusted to it is maintained in an accurate manner. All NWCR members and participants will have the ability to view and review personal information retained by the Association. The Association shall attempt to maintain the privacy interests of all individuals and attempt to ensure that decisions are not made for or about an individual based on personal information that may be flawed.

The Association shall only update personal information in its possession if a request is made in writing.

#### **Principle 7 - Safeguards**

Security safeguards will be implemented to ensure that all personal information is protected from theft as well as unauthorized use or access, disclosure, copying or modification.

All information collected by the Association will be considered highly sensitive. As such, a high level of security will be practiced at all times. Methods of protection and safeguards may include but are not 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.

### **Principle 8 - Openness**

Upon request, the Association shall provide a copy of this policy to any Northwest member or participant. The Association shall also make this policy available to all Northwest members and participants on the Northwest website.

If anyone has any questions, comments or concerns regarding this policy, they can contact the President in writing.

### **Principle 9 - Individual Access**

Upon request, the Association shall provide access to personal information in its possession to the individual to whom the information relates or to the parent/guardian of such individual. The Association shall disclose the source of the information when requested and provide an account of any third parties to whom the information may have been disclosed. The Association shall endeavour to provide such information within 30 days of receipt of the request and only charge nominal fees for the purpose of satisfying its expenses incurred in supplying such information.

The Association may request sufficient information to confirm an individual's identity before releasing any personal information.

A NWCR member or participant may challenge the accuracy or completeness of the information and any inaccurate information shall be corrected and any third parties shall be notified of the corrections.

### **Principle 10 - Challenging Compliance**

1. Anyone wishing to challenge the Association's compliance with this policy may file an appeal in accordance with the Club's Appeal Policy.