

Policy Number: NWR02

Most Responsible Board Member: President and Director of Member Administration

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## **Purpose**

- To ensure the protection of Confidential Information
- To describe how Northwest Calgary Ringette Society (NWR) will collect, use, retain, safeguard, disclose and dispose of the personal information of all members and participants.

#### **Definitions**

Refer to the Northwest Calgary Ringette Society (NWR) Bylaw definitions.

The following terms have these meanings in this Policy:

**Individuals** means all categories of Membership within NWR Bylaws, as well as all individuals engaged in activities with NWR, including but not limited to, athletes, coaches, parents/guardians, volunteers, managers, administrators, directors and officers.

**Confidential Information** means data or information collected or held by NWR and includes, but it not limited to personal information collected and retained by NWR, such as, name, address, email, telephone number, cell phone number, date of birth and financial information, and Club intellectual property and proprietary information related to the programs, fundraisers, business or affairs of NWR, including, but not limited to procedures, business methods, forms, policies, business, marketing and development plans, advertising programs, creative materials, trade



secrets, knowledge, techniques, data, products, technology, computer programs, manuals, software, financial information and information that is not generally or publicly known.

## **Application of this Policy**

This policy applies to all Individuals as defined.

## Responsibilities

- Individuals will not, either during the period of their involvement/employment or any time
  thereafter, disclose to any person or organization any Confidential Information acquired
  during their period of involvement/employment with NWR, unless expressly authorized to
  do so.
- Individuals will not publish, communicate, divulge or disclose to any unauthorized person, firm, corporation, third party or parties any Confidential Information or any part thereof, without the express written consent of NWR.
- 3. All files and written materials relating to Confidential Information will remain the property of NWR and upon termination of involvement/employment with NWR or upon request of NWR, the Individual will return all Confidential Information received in written or tangible form, including copies, or reproductions or other media containing such Confidential Information, immediately upon such request.

#### **Intellectual Property**

Copyright and any other intellectual property rights in all written material (including material in electronic format) and other works produced in connection with employment or involvement with NWR will be owned solely by NWR, who will have the right to use, reproduce or distribute such material and works, or any part thereof, for any purpose it wishes. NWR may grant permission for others to use such written material or other works, subject to such terms and conditions as NWR may prescribe.

#### **Enforcement**

A breach of any provision in this policy may give rise to discipline in accordance with NWR Discipline and Complaints policy or legal recourse.

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#### **Privacy**

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

## **Principle 1 - Accountability**

- 1. NWR 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.
- 2. The Registrar shall ensure that NWR 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 NWR shall be obligated to adhere to the standards of this policy.
- 3. NWR 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**

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

4. NWR 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, Ringette Calgary, and Chinook Ringette League 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	To measure the success of NWR programs and



feedback on programs and awards received.	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.
Security screening, 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 suitability for a position within NWR.
Appeal Information	To administer appeals and any related proceedings, and the rules, regulations and bylaws of NWR, Ringette Canada, Ringette Alberta, Ringette Calgary, and Chinook Ringette League.
Coaching Applications	To determine a prospective head coach



Confidentiality and Privacy		
	's suitability to coach a NWR 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 on a team. To provide feedback to the head/assistant coach or team personnel.	
Player Evaluations	To help balance league teams.	

- 5. NWR shall request individual permission to use any personal information for purposes other than those identified above unless such usage is authorized or required by law.
- 6. NWR shall advise registration candidates of the purposes for the collection of their personal information at the time of registration by reference to this policy.
- 7. Where practicable, all personal information collected by NWR shall be stored in secure online drives managed by NWR Board and accountable to the President.
- 8. NWR may require that personal information be provided to gain access to secure areas of the NWR website. Any information provided will be treated within the same parameters as other personal information collected by NWR through other means. It will always remain the user's choice to provide information in certain fields.

#### Principle 3 - Consent

- 9. All members of NWR agree that the act of registering constitutes implied consent to the use of personal information for the purposes specified above.
- 10. While participants are under no obligation whatsoever to supply medical records, medical history or medical forms and may refuse to do so without penalty, NWR will consider receipt of this information as consent for its subsequent use in an emergency medical situation.
- 11. 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.
- 12. In exceptional circumstances, NWR 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**

13. NWR shall only collect personal information by fair and lawful means. NWR 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 above and such other purposes as are reasonably related to the objectives of NWR.

## Principle 5 - Limiting Use, Disclosure and Retention

- 14. NWR 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.
- 15. 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.
- 16. NWR may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where NWR 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.
- 17. If any NWR 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 NWR team may use or disclose personal information supplied to it directly or by NWR for purposes other than those set out above without the consent of the person to whom the information relates. This includes the disclosure of personal information on any web page or social media.
- 18. NWR may release personal information for the purpose of collecting debts that are owed to NWR.
- 19. 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.
- 20. Registration data shall be retained for a three-year period after a player has left NWR. Parental/family information shall be maintained for a similar three-year period after a member has left NWR.
- 21. Personal information that is no longer required or permitted to be retained by NWR will be destroyed in a secure manner.

#### Principle 6 - Accuracy

- 22. NWR shall strive to ensure, to the extent that it can, that the information entrusted to it is maintained in an accurate manner. All NWR members and participants will have the ability to view and review personal information retained by NWR. NWR 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.
- 23. NWR shall only update personal information in its possession if a request is made in writing.



## **Principle 7 - Safeguards**

- 24. 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.
- 25. All information collected by NWR 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**

- 26. Upon request, NWR shall provide a copy of this policy to any NWR member or participant. NWR shall also make this policy available to all NWR members and participants on the NWR website.
- 27. If anyone has any questions, comments or concerns regarding this policy, they can contact the NWR President in writing.

## **Principle 9 - Individual Access**

- 28. Upon request, NWR 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. NWR 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. NWR shall endeavor 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.
- 29. NWR may request sufficient information to confirm an individual's identity before releasing any personal information.
- 30. A NWR 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**

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

#### **Cross Reference**

NWR08 Technology

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## **Revision History**

Date	Action Taken
Nov 14, 2024	Document formatted.
	Combined Confidentiality and Privacy Policies, Appendix F – Confidentiality, and Appendix G Privacy.
	Chinook Ringette League added.
	No substantive changes made. (T. Laerz, Director at Large)
May 7, 2025	Approved by NWR Board.