



Bowls Alberta



Privacy Policy

Policy Statement

Bowls Alberta (BA) is committed to safeguarding the personal information entrusted to them by our club and affiliate members. Privacy of personal information is governed by the *Personal Information Protection and Electronic Documents Act* ("PIPEDA") of Canada. This policy is based on the standards required by PIPEDA, and BA's interpretation of these responsibilities.

Purpose

This policy describes the way that BA collects, uses, safeguards, discloses, and disposes of personal information, and states BA's commitment to collecting, using and disclosing personal information responsibly. BA recognizes the right to privacy of individuals with respect to their personal information and the need of BA to collect, use or disclose personal information.

Definitions

Personal information: any information about an identifiable individual including information that relates to their personal characteristics including, but not limited to, gender, age, income, email address, home address or phone number, ethnic background, family status, health history and health conditions.

Representatives: All affiliated members of BA including directors, officers, volunteers, coaches, officials, and athletes/players

Stake Holders: Affiliated organizations which fund BA or are connected by payment of membership.

The Act: Personal information Protection and Electronic Documents Act (PIPEDA).

Data Manager: a person designated by the member club to have access to the specific club member information to input and/or correct individual affiliated member information.

Application

1. Collection of personal information

- a. Personal information is collected from member clubs as inputted into the online database by a club Data Manager or by the Executive Director.
- b. Limited personal information is collected through the registration of members to be involved in BA activities.

2. Consent for the collection, use or disclosure of personal information

- a. BA will obtain consent by lawful means from individuals at the time of collection and prior to the use or disclosure of this information. BA may collect personal information without consent where reasonable to do so and where allowable by law.
- b. Consent to collect, use and disclose personal information is implied when an application form for membership in a member club is completed.
- c. In determining the form of consent to use, BA will consider the sensitivity of the information, as well as the individual's reasonable expectations.

3. Withdrawal or variation of personal information

An individual may withdraw consent to the collection, use or disclosure of personal information at any time, subject to legal or contractual restrictions. This request must come through the BA office in writing and BA will inform the individual of the implications of such withdrawal. Individuals who wish to withdraw or vary information gathered by BA may do so using the correction of personal information section of the policy.

4. Accuracy of personal information

Accuracy of information held by BA may be checked by a Data Manager of a member club. Individual affiliated members do not have access to the database of members.

5. Access to personal information

Access to personal information held by BA is limited to

- a. staff and contactors of BA, in fulfilling their duties
- b. officers of BA board, through the Executive Director in fulfilling their duties
- c. the verified Data Manager of the individual's club

6. Correction of personal information

- a. To correct personal information maintained by BA, a verified Data Manager of the member club must correct the information on the BA database website.
- b. If incorrect information is discovered by the Executive Director adjustment to the personal information may be made.

7. Protection of personal information

- a. BA will protect personal information by making reasonable arrangements against such risks as unauthorized access, collection, use, disclosure, copying, destruction, or disposal of information.
- b. Methods of protection and safeguards include, but are not limited to, restricted access to offices, need-to-know access, and technological measures including the use of passwords, encryption, and firewalls.
- c. Employees and Data Managers will be made aware of the importance of maintaining personal information confidential and may be required to sign confidentiality agreements.
- d. Codes and passwords used to protect personal information will remain confidential and copies of these will be retained in a secure place by the Executive Director.

8. Retention of personal information

Personal information will be retained for one year after collection and then archived. Archived material will remain secure until the BA Board of Directors instructs the Executive Director to destroy the information. Paper documents will be destroyed by shredding and electronic records will be permanently deleted if not applicable to membership archived membership lists.

9. Use of personal information

- a. For grant reporting purposes BA submits and maintains membership lists that include gender, birthdate, and address/postal code of all affiliated members. BA also reports numbers of members in categories of coaches, officials, leaders, those with disabilities and other categories as identified by grant funders.

- b. Individual information is used to report to Stake Holders the participation types and levels of its affiliated members by gender and age categories in AB zones. i.e., athletes, coaches, officials, drawmasters, years of involvement and those in leadership roles
- c. To send communications from BA regarding newsletters, programs, events, and activities
- d. Database entry to the *National Coaching Certification Program* (NCCP) Locker to maintain accurate records of coaches and their completion of courses
- e. Database entry to maintain accurate records of officiating certification and qualifications
- f. Database entry for determination of eligibility for provincial and national competitions
- g. In case of a medical emergency
- h. Athlete registration, outfitting uniforms, and various components of athlete and team selection
- i. Canadian Centre for Ethics in Sport inquiries for the purposes of drug testing
- j. Determination of membership demographics

10. Consent of Individuals

BA will seek consent from individuals for posting photographs where they are identified and when personal information is requested for commercial purposes not previously identified. All Affiliate members are encouraged to sign the photo consent portion of their club registration form.

Consent will not be obtained for the following:

- i. If BA has reasonable grounds to believe the information could be useful when investigating a contravention of a federal, provincial, or foreign law and the information is used for that investigation
- ii. For an emergency that threatens an individual's life, health, or security
- iii. For statistical or scholarly study or research
- iv. If it is publicly available as specified in the Act
- v. If the use is clearly in the individual's interest and consent is not available in a timely way
- vi. If knowledge and consent would compromise the availability or accuracy of the information and collection was required to investigate a breach of an agreement or contravention of a federal or provincial law

11. Disclosure of personal information

BA may disclose personal information without the individual's knowledge or consent only:

- a. To a lawyer representing BA
- b. To collect a debt the individual owes to BA
- c. To comply with a subpoena, a warrant or an order made by a court or other body with appropriate jurisdiction
- d. To a government institution that has requested the information, identified its lawful authority, and indicated that disclosure is for the purpose of enforcing, carrying out an investigation, or gathering intelligence relating to any federal, provincial or foreign law; or that suspects that the information relates to national security or the conduct of international affairs; or is for the purpose of administering any federal or provincial law
- e. To an investigative body named in the Act or government institution on BA's initiative when BA believes the information concerns a breach of an agreement, or a contravention of a federal, provincial, or foreign law, or suspects the information relates to national security or the conduct of international affairs
- f. To an investigative body for the purposes related to the investigation of a breach of an agreement or a contravention of a federal or provincial law

- g. In an emergency threatening an individual's life, health, or security (BA must inform the individual of the disclosure)
- h. For statistical, scholarly study or research, summary data will be disclosed
- i. To an archival institution
- j. 20 years after the individual's death or 100 years after the record was created
- k. If it is publicly available as specified in the regulations
- l. If otherwise required by law

12. The Executive Director of BA will fulfill the role of a privacy officer and will:

- a. Implement procedures to protect personal information
- b. Maintain security codes and passwords in a safe place
- c. Establish procedures to receive and respond to complaints and inquiries
- d. Record all persons having access to personal information
- e. Ensure any third-party providers abide by this policy
- f. Train and communicate to staff, contractors, and to clubs' Data Managers BA's privacy policies and practices

13. Security Audit

When directed to by the Board of Directors a board member will instigate a privacy audit to ensure the policy on Protection of Personal Information is followed.

14. Security breach

If BA becomes aware of a security breach relating to the personal information collected, used, disclosed, or stored, BA will immediately notify the member clubs of the breach.

15. Additional Obligations

In addition to fulfilling all requirements of the Act, BA and its Representatives will also fulfill the additional requirements of this Policy and Representatives of BA will not,

- a) Disclose personal information to a third party during any business or other transaction unless such business, transaction or other interest is properly consented to in accordance with this Policy
- b) Knowingly place themselves in a position where they are under obligation to any organization to disclose personal information
- c) In the performance of their official duties, disclose personal information to family members, friends or colleagues, or to organizations in which their family members, friends or colleagues have an interest
- d) Derive personal benefit from personal information that they have acquired while fulfilling their duties with BA
- e) Accept any gift or favor that could be construed as being given in anticipation of, or in
- f) recognition for, the disclosure of personal information