

## [Note to draft - Insert full name of PSGB] PRIVACY POLICY

### 1. Our Privacy Commitment

[Insert full name of PSGB] (“[Insert acronym or short form version of PSGB name]”) is committed to keeping personal information accurate, confidential, secure and private.

Based on the *Personal Information Protection and Electronic Documents Act* (PIPEDA), this Policy describes how [PSGB] adheres to the ten principles of privacy set out in PIPEDA which are summarized in the attached Schedule “A.” The Privacy Policy will outline the types of personal information we may collect from members, athletes and, where applicable, donors and customers, and explains how we may use it and disclose it to others. It will also outline the safeguards we implement to protect personal information and provide to members and donors the opportunity to access and correct personal information we have about them.

A copy of PIPEDA is available at the federal Privacy Officer’s website at [www.privcom.gc.ca](http://www.privcom.gc.ca).

### 2. Information We Gather and Use – Collecting your Personal Information

This policy only applies to your personal information that we collect or use in relation to a commercial activity of [PSGB].

At [PSGB], we ask for your permission when we collect, use or disclose your personal information in the course of a commercial activity. Personal information is that which refers to you specifically and is collected in person, over the telephone or by corresponding with you via mail, facsimile, or over the internet.

When you request a service or membership from us, or participate in an athletic event sanctioned by us, we, or our affiliates, subsidiaries or related organizations, may, with your consent, collect personal information from you, which may include the following:

- i) name;
- ii) mailing address;
- iii) email address;
- iv) telephone number;
- iv) contact numbers;
- v) social insurance number; and
- vi) date of birth;
- vii) for competitions, personal height and weight, and past competition results;
- viii) in certain instances, pertinent health information regarding athletes.

The following activities are examples of when **[PSGB]** may require the collection or use of your personal information:

- i) collection of membership, registration or competition fees;
- ii) organization of club activities;
- iii) communicating with you about **[PSGB]** or related association or organization activities;
- iv) compiling member statistics;
- v) compiling member, athlete or registration lists;
- vi) providing member, athlete or registration lists or member discipline or suspension reports or histories to other sports organizations;
- vii) mailing out member newsletters;
- viii) selling programs for competition, promotional, fundraising or other purposes;
- ix) selling, bartering or leasing of member, donor or fundraising lists to third parties;
- x) participating in a dispute resolution process;
- xi) participating in a fundraising or planned giving programs;
- xii) communicating with members and athletes;
- xiii) using membership or donor lists for commercial activities of **[PSGB]** or its related associations or organization; and
- xiv) selling advertising in publications of **[PSGB]** that contain personal information about the member, a donor or athletes (for example, athlete statistics).

During the application process to become a **[PSGB]** member, or to renew your membership, or as a non-member, donor or athlete associated with **[PSGB]**, you may have provided us with written consent respecting the collection, use and disclosure of your personal information. This Privacy Policy is intended to supplement, and does not replace or modify any such written consent previously provided.

You have a choice whether to provide us with the personal information requested. In our operations, however, your decision to withhold particular details may limit the services, association or membership we are able to provide you. In some cases we may not be able to enter into a relationship with you.

**[PSGB]** maintains a contact history for each member, which is used primarily for service, collection and payment purposes. This information, however, is limited to internal use and restricted to our employees, agents and volunteers.

The information we ask you to provide varies with the circumstances of your activity or the service you request such as:

#### General Inquiry

For general inquiries on our organization, you may need to provide limited information such as your name, contact address or contact number. This will allow us to contact you with regard to your interest in **[PSGB]**.

## [PSGB] Service

You may need to call [PSGB] to make an inquiry as to your standing as a member or your activities within the organization. In such instances, we will ask you to provide, at minimum, your name and residence.

## Athlete Participation

We may be required to provide certain personal and statistical information regarding athletes for the purposes of competitions or rankings

We may use the personal information you provide to us to:

- communicate with you
- provide you with the information you have requested
- provide statistical information and results for competitions and events
- advertising or promotional activities

**[Note to draft – add any other possible uses of personal information collected from a member, athlete or donor]**

With your consent, we may also send you information about other activities in which we believe you would be interested. We want to assure you that we only use your personal information for the purposes that we have disclosed to you.

Most of the information we retain about you consists of your membership and competition record. We use transactional information to keep track of and report back to you in these areas, if requested.

### **3. With Whom We May Share Your Information**

#### **a) Related Associations and Organizations**

[PSGB] and its employees and volunteers are all governed by our policies and procedures to ensure that your information is secure and treated with the utmost care and respect. To enable you to benefit from our full range of activities and benefits, we may share information with other [PSGB] affiliates or related organizations that perform services on our behalf or provide services to you.

#### **b) Employees and Volunteers**

In the course of daily operations, access to private, sensitive and confidential information is restricted to authorized employees or volunteers who have a legitimate purpose and reason for accessing it. For example, when you call or e-mail us, our designated employees will access your information to verify that you are the member and to process your requests.

As a condition of their employment or volunteer activities, all of our employees and volunteers are required to abide by the privacy standards we have established. Educate our employees, agents and volunteers about the responsibilities of handling personal information. Unauthorized access to and/or disclosure of member information by an employee or volunteer of [PSGB] is strictly prohibited. All employees and volunteers are expected to maintain the confidentiality of personal information at all times and failing to do so could result in appropriate disciplinary measures, which may include dismissal or termination of volunteer activities.

**c) Outside Service Suppliers**

We sometimes contract outside organizations to perform specialized services, such as processing data, applying payments or facilitating mail-outs. Our service suppliers may at times process or handle some of the information we receive from you.

When we contract with our suppliers to provide specialized services, they are given only the information necessary to perform those services. Additionally, they are prohibited from storing, analyzing or using that information for purposes other than to carry out the service contracted with us to provide. Our suppliers are bound by contractual obligations designed to protect the privacy and security of your information. As part of our contract agreements, our suppliers and their employees are required to protect your information in a manner consistent with the privacy policies and practices that we have established.

**d) Other**

We do share personal information of our members in the following circumstances:

- i) When required by law - There are some types of information that we are legally required to disclose. We may also be required to disclose information in connection with a legal proceeding or court order to authorities. Only the information specifically requested by legitimate authorities will be disclosed;
- ii) When permitted by law - In certain other situations we may be required to disclose personal information, such as when returning a cheque due to insufficient funds or when dealing with a legal matter that concerns your membership or activities within [PSGB];
- iii) When disclosure is clearly in your best interests, as determined in the sole discretion of [PSGB], and consent cannot be obtained in a timely manner;
- iv) Where the information is considered to be in the public domain;
- v) To collect a debt owed to [PSGB]; and
- vi) In cases of emergency.

[PSGB] may disclose the following kind of personal information about you:

- a) Information we receive from you on your application and other forms you submit to us or communications between us, including by writing, by telephone, by fax or by electronic format. This information includes, for example, your name, your address, and telephone number.
- b) Information about your dealings and relationship with us and our related associations and organizations. For example, this information includes your membership status and athletic activities.

We may also disclose the same kind of personal information described above with respect to our former members.

#### **4. How we Safeguard your Information**

At [PSGB], we do our best to protect the privacy of our members. All of our databases are password protected and customer information is given to employees and volunteers only to conduct their jobs or tasks. Our employees and volunteers are required to update their computer passwords regularly. **[Note to draft – ensure these statements are accurate?]**

We will ensure that the security of information held in our possession will be at a level that complies with PIPEDA.

#### **5. Internet Websites**

**[Note to draft – this section may require modification depending on the PSGB’s website.]**

We do not monitor individual use of our website at **[Insert website address]**. We do however monitor activities on the website to improve its functionality. This information does not contain personal information, beyond what is needed for contact purposes, and is not permanently stored for future use.

#### **6. Verifying Your Information**

At [PSGB] decisions that directly impact you are made based on the information we have about you. Therefore, it is important that your personal information is accurate and complete.

As a member, athlete, donor or customer, you have the right to access, verify and amend your personal information held by us.

## 7. Accessing your Personal Information

[PSGB] will provide a procedure for its members, athletes and non-member customers to view information held by [PSGB] and to report and quickly remedy inaccurate information. There are certain situations where [PSGB] may not provide an individual access to their personal information, including those instances where:

- i) the information is prohibitively costly to provide;
- ii) the information contains references to other individuals, including members, donors or non-member customers;
- iii) the information cannot be disclosed for legal, security or commercial propriety reasons; and
- iv) the information is subject to solicitor-client or litigation privilege.

We have appointed a privacy officer to ensure that the requirements of PIPEDA are adhered to.

## 8. Withdrawing Consent

Upon becoming a member of [PSGB], participating in activities arranged or sanctioned by us, you consent to our use, collection, verification and disclosure of your personal information in accordance with this Policy. You may at any time withdraw your consent for your personal information to be used for certain purposes. A withdrawal of consent must be in writing and must be sent to us registered mail to the address listed below. If your consent is withdrawn, this may restrict our ability to assist you or to extend membership privileges and we may not be able to provide you with all of our benefits, products and services.

### In Summary

We take our responsibility to respect and protect the confidentiality of your personal information very seriously. For more information about our commitment to protect the privacy and confidentiality of your personal information or to express any concerns you may have, please write to:

[PSGB]  
[Insert address]  
•, Saskatchewan  
•  
Attention: Privacy Officer

You can also email us at • or fax us at : •

## **Schedule "A" to [PSGB] Inc. Privacy Policy**

### **Principle 1 -- Accountability**

An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.

### **Principle 2 -- Identifying Purposes**

The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.

### **Principle 3 -- Consent**

The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except where inappropriate.

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

The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.

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

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

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

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

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

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

### **Principle 8 -- Openness**

An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

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

Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

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

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.