

# Privacy Policy

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## **Introduction:**

Skate Canada is committed to protecting the privacy of its employees, contractors, consultants, suppliers, volunteers, registrants (herein referred to as "individual") and any other confidential business information. The purpose of this policy is to preserve the privacy of the individual and Skate Canada by outlining the obligations and procedures for dealing with personal, privileged and/or confidential information.

## **Scope:**

This policy applies to all individuals, employees, contractors, volunteers, suppliers, and consultants of Skate Canada or anyone else who is granted access to personal, privileged, and/or confidential information.

## **Definitions:**

"Personal information" is any information about an identifiable individual and includes race, ethnic origin, color, age, marital status, family status, religion, education, medical history, criminal record, employment history, financial status, address, telephone number, credit card and banking information, and any numerical identification, such as Social Insurance Number. Personal information also includes information that may relate to the work performance of the individual, any allegations, investigations or findings of wrongdoing, misconduct or discipline. Personal information does not include job title, business contact information or job description.

"Personal health information" is information about an identifiable individual that relates to the physical or mental health of the individual, the provision of health care to the individual, the individual's entitlement to payment for health care, the individual's health card number, the identity of providers of health care to the individual or the identity of substitute decision-makers on behalf of the individual.

## **Policy:**

All individuals at one time or another may receive personal, privileged and/or confidential information which may concern other individuals. Individuals are obligated to ensure that personal information to which they may have access remains confidential, is only used for the purposes for which it was collected is not disclosed without authorization or used for personal gain. Any individual who discloses personal information, contrary to this policy will be subject to disciplinary measures.

Individuals are required to follow the *10 Fair Information Principles* and procedures regarding the collection, use and disclosure of personal information as set out in this policy.

- a. **Accountability:** Skate Canada is accountable to those whose personal information comes under its custody for ensuring that their information is protected in a manner consistent with this policy. Accountability for Skate Canada's compliance with the policy rests with the Safe Sport Director, or delegate.
- b. **Identifying Purposes:** Skate Canada will identify the purpose for which it collects, uses, and discloses personal information prior to collecting the information. Skate Canada only collects, uses or discloses personal information for purposes consistent with meeting its mandate and core functions.
- c. **Consent for Collection, Use or Disclosure:** Knowledge and consent of the individual are required for the collection, use or disclosure of identifiable personal information, except where legally permissible. Notice of Collection statement must be communicated to registrants at registration (Appendix A). Knowledge and consent of the individual is not required for the collection, use or disclosure of non-identifiable personal information. Individuals with a direct relationship with Skate Canada may withdraw their consent and can do so by contacting Skate Canada.
- d. **Collection:** Skate Canada limits the collection of personal information to that which is necessary for the purposes it has identified. Skate Canada collects personal information by fair and lawful means.
- e. **Use and Retention:** Skate Canada does not use identifiable personal information for purposes other than those identified prior to collection, except with the consent of the individual or as required by law. "Use" includes processing identifiable information in such a way that it is no longer identifiable. Skate Canada allows only authorized staff to access and use specific data holdings of personal information on a "need-to-know" basis, that is, when required to perform their duties. Personal information is retained only as long as necessary for the fulfillment of purposes identified at collection. For purposes of long-term analysis and reporting, Skate Canada may retain personal information permanently. Personal information that is no longer required to fulfill the identified purposes is destroyed, erased, or made anonymous in a secure manner.
- f. **Disclosure:** Skate Canada may disclose or publish non-identifiable (e.g. aggregated) personal information only, having used reasonable precautions to ensure that individuals cannot foreseeably be identified by linking this information with other information. Skate Canada may disclose identifiable personal information only when: a) the recipient is the data provider that originally provided the identifiable personal information., or b) the disclosure is required by legislation, or c) Skate Canada has obtained the consent of the individuals concerned.
- g. **Accuracy:** Personal information will be as accurate, complete and up-to-date as necessary for the purposes for which Skate Canada collects, uses or discloses it. Skate Canada updates personal information when necessary to fulfill the purposes for which

the information is collected, used or disclosed. Data providers are responsible for ensuring the personal information they provide to Skate Canada is accurate, complete and up-to-date for the purpose specified.

- h. **Safeguards:** Skate Canada protects personal information with security safeguards appropriate to the sensitivity and identifying nature of the information. The security safeguards protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification and will protect personal information that it holds or transmits regardless of the format in which it is held. Care is used in the disposal or destruction of personal information to prevent unauthorized parties from gaining access to the information.
- i. **Transparency and Openness:** Those whose personal information Skate Canada collects, uses and discloses are entitled to know what Skate Canada's practices and policies are in connection with this information and to challenge those practices and policies. Skate Canada makes readily available information about its practices and policies in order to promote transparency and explicitness.
- j. **Individual Access to and Amendment of Personal Information:** Upon request, Skate Canada will inform an individual what identifiable personal information it has collected, used or disclosed about him/her, and from whom it has been collected and to whom it has been disclosed. An individual shall be able to access his or her personally identifiable information, and to have it amended as appropriate, which may include the correction, deletion or addition of information. Skate Canada responds to an individual's request to amend his or her identifiable personal information within a reasonable time and at minimal or no cost to the individual.

## Responsibilities:

### Individuals:

- Being familiar with and following policies and procedures regarding personal information.
- Keeping their own files current regarding business and personal details required for business use.
- Obtaining the proper consents and authorizations prior to disclosure of personal information. (reference Skate Canada's Consent and Authorization for the Release of Private Information form)
- Immediately reporting any breaches of confidentiality to their Manager.
- Keeping private passwords and access to personal data secured. Sharing of passwords is not permitted.
- Relinquishing any personal, privileged, confidential or member information in their possession before or immediately upon termination of employment.

- Ensuring proper disposal of unnecessary files/information, shredding boxes are available throughout the Ottawa Service Centre.

### **Managers:**

- Obtaining consent for the collection and use of personal information from individuals as required.
- Ensuring policies and procedures regarding collection, use and disclosure of information are consistently adhered to.
- Responding to requests for disclosure after the proper release is obtained.
- Ensuring proper disposal of unnecessary files/information.
- Maintaining systems and procedures that ensure employee records are kept private and secured.

### **Complaint Procedure:**

Concerns or complaints related to privacy issues must be made in writing to the Safe Sport Director outlining the details of the concern or complaint. The Director will investigate the matter quickly and make a determination related to the resolution of the concern or complaint.

\*Personal information that is the subject of a request by an individual or the Privacy Commission shall be retained as long as necessary to allow individuals to exhaust any procedures they may have a right to under the law.

No employee shall be disadvantaged or denied any benefit of employment by reason that Skate Canada believes that the employee:

- a. Has disclosed to the Privacy Commissioner of Canada that Skate Canada or any other person has contravened a provision of current privacy legislation;
- b. Has refused to do anything that is in contravention of a provision of the legislation related to the protection of personal information;
- c. Has done or stated an intention of doing anything that is required to be done in order that a provision of the legislation as related to the protection of personal information not be contravened.

### **General Procedures:**

Individual's request for disclosure of their own personal information to Third Parties must be accompanied by a completed, signed, and dated Consent and Authorization for the Release of Private Information form providing clear consent to release specific information related to them and providing details on who can receive the information.

Personal information that is no longer required to fulfill the identified purpose will be destroyed or erased within 12 months after its use unless retention of that information is specified by law for certain time periods.

### Compliance

I acknowledge, understand and will comply with the Privacy Policy.

Full Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_