



| PRIVACY POLICY | | | |
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| Reviewed: | February 26, 2017 | Effective: | February 26, 2017 |
| Next Review: | February 2020 | Approval: | Board of Directors |

Athletics Ontario (AO) is subject to the Personal Information Protection and Electronic Documents Act (PIPEDA) (“the Act”). PIPEDA requires Canadian not-for-profits to adhere to ten (10) privacy principles to ensure fair information practices that in turn form the ground rules for the collection, use and disclosure of personal information.

In accordance with the Act, Athletics Ontario is responsible for the protection of personal information and the fair handling of it at all times both throughout the organization and in dealings with third parties.

APPLICATION

- (a) This policy provides direction on how personal information is collected, used and disclosed within Athletics Ontario.
- (b) AO will comply fully with the principles and exceptions set out in the Act.
- (c) AO requires that its clubs establish, implement and adhere to policies that are substantially similar to the AO Privacy Policy.

PRINCIPLES OF FAIR INFORMATION PRACTICES

1. Responsibility and Accountability

Athletics Ontario is responsible for maintaining and protecting all personal information that it collects.

The AO Chief Executive Officer has the primary responsibility for ensuring compliance with the AO Privacy Policy as set out herein and has the authority to intervene on privacy issues that relate to any of AO’s operations. As such, the CEO is responsible for:

- (a) Collecting, using and disclosing of personal information;
- (b) Responding to requests and general inquiries for personal information;
- (c) Responding to requests for correction to personal information;
- (d) Responding to complaints about the collection, use and disclosure of personal information by AO;
- (e) Explaining the purpose(s) for the collection, use and disclosure of personal information;
- (f) Explaining the procedure to withdraw consent and the consequences, if any, of such a withdrawal.

The CEO may delegate any responsibilities set out herein to another AO employee or to an individual approved by the AO Board. All AO club administrators, coaches, officials and employees, or any individual approved by the Board to handle any responsibilities set out herein, are required to understand and adhere to the AO Privacy Policy.

2. Identifying Purposes

The purposes for which personal information is collected shall be identified by or on behalf of Athletics Ontario at or before the time the information is collected. This includes the reason(s) for collecting the information and how it will be used. If the reason(s) for collecting the information and/or how it will be used changes after the information is collected, AO will inform the affected individual(s) and obtain consent before the information is used.

3. Consent

AO requires an individual's consent for the collection, use, or disclosure of personal information:

- (a) Before or when any personal information is collected by or on behalf of AO, or when the reason(s) for collecting the information and/or how it will be used changes, AO will obtain consent from the individual whose personal information is collected, used or disclosed.
- (b) For an individual who is a minor, seriously ill, or mentally incapacitated, consent may be obtained from a legal guardian, or person having power of attorney.
- (c) Consent may be obtained in person, by phone, by fax, by mail, by email or by internet, or by any other reasonable method, whether express or implied.

Personal information may be collected from more than one source and combined.

4. Limiting Collection

Athletics Ontario limits the information it collects to what is needed for specific purposes identified by the association at the time the personal information is collected. Information is collected by fair and lawful means.

5. Limiting Use, Disclosure, and Retention

AO will limit the use and disclosure of the personal information it has collected to the purpose(s) for which it was collected, unless the individual otherwise consents or the use or disclosure is authorized by law.

Where possible, AO will use contracts or other agreements to ensure the protection of personal information that has been collected by AO and that is transferred to a third party (i.e., Athletics Canada) for use, including but not limited to:

- (a) The personal information transferred to a third party will be limited to what is needed by and for the purposes necessary for the third party to fulfil the contract or agreement.
- (b) The third party will be required to refer to AO any requests for access to or complaints about the information provided.
- (c) When the personal information is no longer required by the third party, the third party will be required to either return the information to AO or dispose of it in a manner acceptable to AO.

Personal information collected by or on behalf of AO will be retained only as long as necessary to satisfy the purpose(s) for which it was collected. Any personal information collected by or on behalf

of AO that is no longer required for an identified purpose or a legal requirement will be destroyed, erased or rendered anonymous in a manner that will prevent improper access.

6. Accuracy

AO will make efforts to keep the personal information collected as accurate, complete and up-to-date as is necessary, taking into account the purpose(s) for which the information is collected and the interests of the individual.

7. Safeguards

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

AO will make efforts to protect the personal information collected with appropriate safeguards and security measures:

- (a) Information may only be accessed by approved officials or employees, or by other persons designated as such by AO, and only to the extent necessary for the identified purpose(s).
- (b) Personal information will only be disclosed to a third party when:
 - i. reasonable steps are taken to identify the individual requesting the personal information;
 - ii. the individual requesting the information is able to establish his/her right to access the personal information requested; and
 - iii. the proposed use of the personal information requested is consistent with the consent given with respect to the collection, use and/or disclosure of the personal information.
- (c) Personal information may only be stored, modified or deleted by the Chief Executive Officer or his/her delegate as set out herein.
- (d) Physical safeguards include restricted physical access to AO offices and secure storage facilities.
- (e) Technological safeguards include restricted file access, computer passwords, firewalls, and file encryption procedures.

8. Openness

Athletics Ontario shall make readily available to individuals specific information about its policies and practices relating to the management of personal information. Any requests or enquiries about this policy can be directed to the AO Chief Executive Officer.

9. Individual Access

Any individual that has provided personal information to AO shall have access to that personal information collected, used or disclosed by or on behalf of AO. An individual may review, amend or update the personal information collected about him/her.

If AO refuses access to an individual to their personal information collected, AO will provide to the individual the reason(s) for the refusal and any recourse available.

Where possible, a response to a request for access to personal information by an individual will be made within 30 days of the request.

AO will make every effort to provide access of any individual to his/her personal information at minimal or no cost. If a cost is anticipated to provide the information requested, AO will advise of the cost prior to disclosing the information.

10. Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the Chief Executive Officer or his/her delegate as set out herein for the Association's compliance.

AO will investigate and respond to all concerns about any aspect of the collection, use and disclosure of personal information, in a timely manner. Where necessary, an individual will be advised of available avenues of complaint, including the Office of the Privacy Commissioner of Canada.

AO will take appropriate measures to correct any inaccurate personal information that is identified or to modify policies or procedures where necessary.

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