

## BCSSA is committed to protecting your information.

BC Summer Swimming Association (“BCSSA”) and its member clubs (the “Member Clubs”) are committed to providing individual registrants of Member Clubs (the “Club Registrants”) with exceptional service. As part of the BCSSA registration process, Member Clubs collect, use and disclose personal information from Club Registrants. Personal information is information about an identifiable individual, such as their name, age, home address, phone number, social insurance number, marital status, medical information, education, or employment information. As a result, protecting Club Registrants’ personal information is a priority for BCSSA and its Member Clubs.

BCSSA and its Member Clubs have always respected Club Registrants’ privacy and safeguarded their personal information. BCSSA strengthened its commitment to protect personal information as a result of the coming into force of British Columbia’s *Personal Information Protection Act (PIPA)*. PIPA sets out the rules for how BC businesses and not-for-profit organizations may collect, use, and disclose personal information. BCSSA will continue to regularly review its Privacy Policy to ensure it is current with any new developments in the law.

This Privacy Policy outlines the principles and practices BCSSA and its Member Clubs follow in protecting Club Registrants’ personal information. BCSSA’s privacy commitment includes ensuring the accuracy, confidentiality, and security of its Club Registrants’ personal information and allowing Club Registrants to request access to, and correction of, their personal information.

This Privacy Policy may be amended in response to changes in the law, or changes in BCSSA’s practice or procedure.

### Policy 1 – Collecting Personal Information

- 1.1 BCSSA, through its Member Clubs, collects personal information from Club Registrants for the purposes of verifying identity, registering Club Registrants, distributing BCSSA information, and administrative and competitive functions. As the personal information collected is required for these purposes and is being provided voluntarily, consent of Club Registrants is implied. Notwithstanding, BCSSA may seek the express written consent of Club Registrants when providing personal information. Further, on request, BCSSA will advise of the purposes for which personal information is being collected.
- 1.2 BCSSA and its Member Clubs will only collect Club Registrants’ personal information that is necessary for the purposes noted within this Privacy Policy.

### Policy 2 – Consent

- 2.1 Where necessary, BCSSA will obtain a Club Registrant’s consent to collect, use or disclose personal information. Consent may be obtained orally, in writing, or electronically. Consent may also be implied.
- 2.2 Where the Club Registrant in question is a minor, consent may be provided by a parent or guardian.
- 2.3 Consent is implied where either:

- the purpose of the collection, use or disclosure of the personal information would be considered obvious and the Club Registrant voluntarily provides personal information to BCSSA or a Member Club for that purpose; or
  - a Club Registrant is given notice and a reasonable opportunity to opt-out of his or her personal information being used for a specific purpose, and the member does not opt-out.
- 2.4 Club Registrants may withhold or withdraw their consent for BCSSA and its Member Clubs to use their personal information in certain ways. However, a decision to this effect may restrict BCSSA's and its Member Clubs' ability to provide the services offered. In those circumstances, BCSSA and its Member Clubs will explain the situation to the Club Registrant to assist them in making their decision.
- 2.5 BCSSA and its Member Clubs may collect, use or disclose personal information without a Club Registrant's knowledge or consent in the following limited circumstances:
- When the collection, use or disclosure of personal information is permitted or required by law including in order to meet any regulatory requirements;
  - In an emergency that threatens an individual's life, health, or personal security and consent cannot be obtained in a timely way;
  - When the personal information is available from a public source (e.g. a telephone directory);
  - When legal advice is required from a lawyer;
  - To protect BCSSA from fraud; and
  - To investigate an anticipated breach of an agreement or a contravention of the law.

### **Policy 3 – Using and Disclosing Personal Information**

- 3.1 BCSSA and its Member Clubs may disclose personal information to its agents or affiliated organizations in order to provide the services they offer to Club Registrants.
- 3.2 BCSSA and its Member Clubs will only use or disclose personal information for the purposes identified in Policy Item 1.1 and Policy Item 3.1 or for a purpose reasonably related to those purposes including:
- BCSSA fundraising matters;
  - surveys in order to enhance the provision of our services; and
  - information as to products or services related to swimming, water polo, synchronized swimming, or diving that may be of interest.
- 3.3 BCSSA and its Member Clubs will not use or disclose personal information for a purpose unrelated to the provision of services that they provide, unless consent is obtained to do so.
- 3.4 BCSSA and its Member Clubs will not sell member lists or personal information to other parties.

## **Policy 4 – Retaining Personal Information**

- 4.1 If BCSSA or its Member Clubs use personal information to make a decision that directly affects a Club Registrant, it will retain that personal information for at least one year so that the individual has a reasonable opportunity to request access to it.
- 4.2 Subject to Policy Item 4.1, BCSSA will retain personal information while an individual continues to be a Club Registrant, and for as long as necessary to fulfill the identified purposes or to serve a legal or business purpose.

## **Policy 5 – Ensuring Accuracy of Personal Information**

- 5.1 BCSSA and its Member Clubs will make reasonable efforts to ensure that personal information is accurate and complete where that information may be used to make a decision about a Club Registrant or disclosed to another organization.
- 5.2 Club Registrants may request correction of their personal information in BCSSA or a Member Club's possession. A request to correct personal information must be in writing and provide sufficient detail to identify the personal information and the correction being sought. A request to correct personal information should be forwarded to the Privacy Officer via the BCSSA Provincial Office.
- 5.3 If the Club Registrant demonstrates that the personal information is inaccurate or incomplete, BCSSA and its Member Clubs will correct the information as required and send out the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the Club Registrant's correction request in the file.

## **Policy 6 – Securing Personal Information**

- 6.1 BCSSA and its Member Clubs are committed to ensuring security of personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 BCSSA and its Member Clubs will use appropriate security measures when collecting, using, disclosing and destroying personal information.
- 6.3 BCSSA and its Member Clubs will regularly review and update their security policies and controls as technology changes to ensure ongoing personal information security.

## **Policy 7 – Providing Access to Personal Information**

- 7.1 Club Registrants have a right to access their personal information, subject to limited exceptions.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Privacy Officer via the BCSSA Provincial Office.

- 7.3 Upon request, BCSSA and its Member Clubs will also advise Club Registrants how their personal information is used and to whom it has been disclosed if applicable.
- 7.4 BCSSA and its Member Clubs will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to respond to the request.
- 7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, BCSSA will inform the Club Registrant of the cost and request further direction on whether or not to proceed with the request.
- 7.6 If a request is refused in full or in part, BCSSA will give notice to the individual in writing, providing the reasons for refusal and resources available to the Club Registrant.

**Policy 8 – Questions and Complaints: The Role of the BCSSA Privacy Officer**

- 8.1 The BCSSA Privacy Officer is responsible for encouraging BCSSA's and its Member Clubs' compliance with the Privacy Policy and PIPA.
- 8.2 Any complaints, concerns or questions regarding BCSSA's or its Member Clubs' compliance, should be directed in writing to the Privacy Officer (see below). If the Privacy Officer is unable to resolve the concern, the individual may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for BCSSA's Privacy Officer:

BCSSA Privacy Officer  
 c/o BCSSA Provincial Office  
 205 – 2323 Boundary Road  
 Vancouver, BC, V5M 4V8  
 T: 604-473-9447 | F: 604-473-9660  
 E: [privacy@bcsummerswimming.com](mailto:privacy@bcsummerswimming.com)

Adoption Date: February 2004	Approved By: Executive Committee Meeting
Revision Date: January 19 <sup>th</sup> , 2013	Approved By: Regular Board Meeting