



PRIVACY POLICY

Purpose of the Privacy Policy

1. The Kitchener Waterloo Sertoma Speed Skating Association (KWSSSC) recognizes the importance of, and is committed to, maintaining the accuracy, confidentiality, and security of personal information.
2. KWSSSC has, as a result of and following the requirements of the federal Personal Information Protection and Electronic Documents Act (PIPEDA), developed this Privacy Policy.
3. The Personal Information Protection and Electronic Documents Act limit the collection, use, and disclosure of personal information.
4. This policy applies only to personal information collected by KWSSSC during the course of KWSSSC related activities.

Personal Information

5. Under PIPEDA, personal information includes any factual or subjective information, recorded or not, about an identifiable individual.
6. Personal information includes that which relates to personal characteristics (e.g., age, gender, home address, phone number, ethnic origin), health (e.g. medical records, health history, health conditions), or activities and views (e.g. opinions, evaluations, comments, disciplinary actions and employee files).
7. Personal information does not include business contact information including an employee's name, title, business address, telephone number facsimile number or email addresses which an organization collects, uses or discloses solely for the purpose of communicating with a person in relation to their employment, business or profession.
8. This Privacy Policy describes the manner in which KWSSSC shall adhere to all relevant legislative privacy requirements, referencing the 10 Canadian Standards Association (CSA) principles.

Scope

9. KWSSSC's Privacy Policy sets out the principles and practices regarding the protection of personal information that is collected, used, or disclosed.

Principles

Accountability

10. KWSSSC is responsible for the personal information under its control. Furthermore, all KWSSSC volunteers who collect, maintain and/or use personal information are responsible for ensuring that the collection, use and disclosure of this information is carried out in accordance with the Act, this policy and relevant procedures.

Identifying Purposes

12. The purpose for which personal information is collected shall be identified by KWSSSC at or before the time the information is collected.
13. KWSSSC shall only collect information pertinent to its speed skating programming and services.
14. KWSSSC collects personal information from interested parties, typically its members, prospective members, coaches, officials, participants, administrators, volunteers, contractors, and vendors directly for the purposes of conducting speed skating programming.
15. In addition to any other specified purpose identified at the time, KWSSSC collects personal information for the following purposes:
 - a. registration of members and calculation and collection of any fees or charges associated with that;
 - b. to process registrations for competition or other events or activities affiliated with or sanctioned under the Ontario Speed Skating Association or Speed Skate Canada, and running reports to capture participant numbers and activities and provide aggregated (non-identifying) information and reports to funders, sponsors, partners and donors and to the media and community generally;
 - c. to appoint an individual to a team or group of participants representing KWSSSC, the Ontario Speed Skating Association or any other body working with or providing support to KWSSSC or the Ontario Speed Skating Association, and for the programs and operations of that team or group of participants;
 - d. to enable coaches and other professionals to provide coaching, support and assistance to individuals;
 - e. to inform individuals about programs, activities and services that are believed to be of potential interest or value to them;
 - f. to better understand an individual's interests in KWSSSC's products, activities and services;
 - g. to develop, enhance or improve programs, activities and services of KWSSSC to better meet the needs of individuals and members;
 - h. to report to sponsors, partners, funders and donors as may be necessary, in aggregate, non-identifiable terms;
 - i. to permit the Ontario Speed Skating Association and Speed Skate Canada to manage their membership lists and carry out their respective operations and activities;
 - j. to meet legal and regulatory requirements;
 - k. to meet the requirements of prudent information retention practices; and

21. Where possible, KWSSSC will obtain consent directly from the individual concerned at the time of collection.
22. Individuals may decline to have their personal information collected, used, or disclosed for certain purposes.
23. An individual has the right to withdraw consent at any time by providing reasonable notice to KWSSSC. If a request to withdraw consent requires that KWSSSC delete an individual's registration information, KWSSSC will no longer be able to provide the programs, services or products for which an individual has subscribed, and that individual may no longer be able to retain his or her status.
24. On the withdrawal of consent by a member, KWSSSC will remove historical information (eg. posted results of competitions, photos) only so far as doing so is within its control and only on a best-efforts basis. Some personal information of the individual will remain in the records of KWSSSC, the Ontario Speed Skating Association or Speed Skate Canada so long as required by the prudent information retention practices of these organizations.
25. By registering in or by allowing themselves to be registered in KWSSSC and the Ontario Speed Skating Association through the Database, or subscribing to any reports or services, by providing personal information to KWSSSC, or otherwise indicating approval, individuals consent to the collection and use of their personal information for the purposes identified in this Privacy Policy. For these purposes, the provision of information to KWSSSC by a member constitutes consent on behalf of the individual whose information is provided.
26. By registering as a member or allowing themselves to be registered as a member with KWSSSC, an individual acknowledges that participating in speed skating activities as a skater, coach, official or in any other capacity is to a very large extent a public matter and consents to photography, videotaping and filming, and the use of that by KWSSSC in the course of its activities.
27. KWSSSC will not require an individual to consent to the collection, use or disclosure of personal information beyond that required to provide products, programs, activities or services of or sanctioned by KWSSSC.
28. KWSSSC may use or disclose personal information without the knowledge or consent of the individual as required by governmental bodies acting with authority, or as authorized or required by applicable legislation or other law.

Limiting Collection

29. KWSSSC collects only the information that is necessary for the purposes outlined in this Privacy Policy.

Limiting Use, Disclosure and Retention

30. 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.
31. KWSSSC shall limit the use of personal information collected to only those purposes identified within this Policy, except with the consent of the individual as legally required.

32. Once personal information is no longer required to fulfill the identified purposes (including prudent information retention practices) or other legal requirements, it will be destroyed, deleted or made anonymous.
33. KWSSSC sometimes uses the services of external firms to assist in communicating with members and clubs (e.g., surveys and mail distribution) or as a means of providing more effective and efficient services (e.g., technology support). External suppliers and contractors are contractually obligated to keep the information confidential, to use the information only for the purpose requested and to destroy the information when it is no longer required.
34. Personal information is shared with external service providers only to the extent required for the provision of such services. Furthermore, KWSSSC will not sell personal information to a third-party organization. External service providers are required to keep the information confidential, to use the information only for the purpose requested and to destroy the information when it is no longer required.
35. In certain circumstances, KWSSSC allows basic contact information of members to be shared amongst KWSSSC or the Ontario Speed Skating Association and its clubs under this policy. Examples of this include providing skater lists for competitions to other clubs or the Ontario Speed Skating Association or sharing contact information amongst members of KWSSSC administrative networks, Boards of Directors or committees to facilitate ongoing communication. This Policy requires that such individuals use that information exclusively for carrying out the activities of KWSSSC, and not for any other personal or business reason.
36. Personal information is retained only as long as necessary for the fulfillment of the purposes stated in this policy.
37. Personal information collected through the Database will be used by system administrators and KWSSSC to register members and to process registrations for competition and other activities, to generate reports to funders, to generate statistical reports and to capture participant numbers.
38. Personal information collected through the Database will be used by KWSSSC and its service-providers to communicate information and news relevant to individuals, including the events and activities of KWSSSC and its partners, funders and sponsors.
39. Personal information may be provided to KWSSSC volunteers as necessary and appropriate, and who agree by this Policy to use it only for the purposes identified in this Privacy Policy or otherwise consented to by the member.

Accuracy of Personal Information

40. Personal information is kept as accurate, complete and up to date as necessary for the purposes for which it is to be used.
41. Individuals are encouraged to provide updates to their personal information as changes occur, to enable continued service from KWSSSC.

Safeguarding Personal Information

42. KWSSSC will safeguard personal information, whatever its form, by means appropriate to the sensitivity of the information. The safeguards will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.

43. The measures of protection include:
- a. physical measures, for example, locking filing cabinets and restricted access to offices;
 - b. organizational measures, for example, limiting access to the personal information on a “need-to-know” basis;
 - c. technological measures, for example, the use of passwords and encryption; and
 - d. procedural measures, for example, the shredding of sensitive personal information when applicable.
44. The Member Management System database used by KWSSSC and maintained by Speed Skating Canada will have the following specific security measures implemented to protect an individual’s electronic personal information:
- a. all information is stored in a single SQL Server Database residing at the data centre located at Peloton Technologies, under contract to Speed Skating Canada.
 - b. Peloton Technologies’ infrastructure providers (the ones that maintain its data centre) are Cirrus 9 (<http://www.cirrus9.net/>) and the database is stored in a High Security Zone that is only accessible by secure VPN connection, and directly from the web servers in the Demilitarized Zone.
 - c. this particular Cirrus9 location is physically secure and located in what was formerly a bank.
 - d. Cirrus9 is 100% Canadian owned and operated
 - e. backups of the database are performed regularly but reside within the High Security Zone.
 - f. from time to time, or upon request, an offsite backup may be initiated for disaster recovery purposes, which offsite backup shall be located in Canada.
 - g. when doing so all information is encrypted and the information will be stored in a location with comparable security.
 - h. more information on the security of individual information collected through the Member Management System database can be found in the privacy policy for the “Peloton My Account” application located at <https://myaccount.pelotontechnologies.com/Pages/Policy.aspx>

Openness

45. KWSSSC is committed to being open about its policies and practices with respect to the handling of personal information.
46. The Privacy Policy is available on the KWSSSC website.
47. If additional information is required, requests for such information may be made to KWSSSC.

Access to Personal Information

48. Individuals may request a copy of their personal information held by KWSSSC by submitting a written request to KWSSSC at the address posted on KWSSSC’s website.
49. An individual will be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

50. Should the individual believe that any personal information is incomplete or inaccurate, the individual may advise KWSSSC to update the information. Where information is subject to interpretation or is an opinion, KWSSSC shall not change the record of information but may annotate the record to indicate the individual's views.
51. An individual may be denied access to their personal information. If KWSSSC determines that the disclosure of personal information should be refused, KWSSSC must inform an individual of the reasons for the refusal and the provisions of the Act on which the refusal is based. The denial of requests may be based upon:
- a. the information is too prohibitively costly to provide;
 - b. the information contains references to other individuals;
 - c. the information cannot be disclosed for legal, security, or commercial proprietary reasons,
 - d. the information is subject to solicitor-client or litigation privilege.
52. Requested information will be disclosed within 30 days of receipt of the request unless there are reasonable grounds to extend the time limit and at minimal expense for copying or no cost to the individual. The requested information will be provided in a form that is generally understandable.
53. Acceptable proof of identification is required before such information is provided.

Challenging Compliance

54. An individual can challenge compliance with the above policy by providing written details of the challenge to KWSSSC.
55. Upon receipt of a challenge, KWSSSC shall acknowledge receipt of the complaint, clarify the nature of the complaint, and make the complaint procedures readily available and accessible.
56. KWSSSC shall promptly review and investigate all allegations of policy violations and/or complaints. The review shall look at practices and procedures which have occurred and determine the appropriate measures to be taken.
57. KWSSSC shall prepare a written report within twenty-eight (28) days of receipt of the complaint.
58. KWSSSC shall notify the complainant of the outcome of the investigation and any measures taken to rectify the challenge within thirty (30) days of the original complaint.

Approval

59. This policy was approved by the KWSSSC Board of Directors on February 12, 2019.