

PROPOSED POLICY CHANGE

DOCUMENT: PP1 -

SECTION: E16- Personal Information Protection Policy

CURRENT WORDING:

Not currently in document. Appears that the Board had previously approved the policy but was removed when policies reverted to previous revision.

PROPOSED CHANGE:

POLICY: Personal Information Protection Policy

1) OBJECTIVE

- a) The intent of the British Columbia Speed Skating Association's (BCSSA) Personal Information Protection Policy (PIPP) is to help individuals understand how their personal information is managed at and by BCSSA.
- b) This Policy is designed to comply with applicable privacy legislation in British Columbia (Personal Information Protection Act SBC 2003 Chapter 63-PIPA) and Canada (The Personal Information Protection and Electronic Documents Act – June 2015 – PIPEDA)

2) FIELD OF APPLICATION

- a) This Policy applies to, but is not limited to, all employees, directors, volunteers, coaches, athletes, officials and all other members of BCSSA.
- b) This Policy applies only to information collected during the course of BCSSA related activities.
- c) Should this Policy not address a specific situation, individuals are expected to contact the BCSSA Executive Director for guidance or clarification.

3) DEFINITIONS

- a) The terms: "all employees, directors, volunteers, coaches, athletes, officials and all other members" are those described within the By-Laws and Policies and Procedures of BCSSA.
- b) Funders: A governmental or quasi-governmental organization which provides funding for high performance programming.

4) PRINCIPLES

- a) The BCSSA PIPP is designed to comply with applicable privacy legislation in British Columbia (PIPA) and Canada (PIPEDA) It incorporates the following 10 principles:
- Accountability
 - Identifying Purpose
 - Consent
 - Limiting Collection
 - Limiting Use, Disclosure and Retention
 - Accuracy of Personal Information
 - Safeguarding Personal Information
 - Openness
 - Access to Personal Information
 - Challenging Compliance
- b) If changes to the Policy are required in the future, those changes will be provided in writing through updates to our official PIPP and communicated according to Section 8 of this Policy.
- c) It is BCSSA's intent that individuals will always know their personal information that is collected, how it is used and how it is protected.
- d) When personal information that has been collected is to be used for a purpose not previously identified, the new purpose will be identified to an affected individual prior to use.

5) POLICY STATEMENT

- a) BCSSA is committed to protecting the privacy of individuals from whom it collects personal information for the conduct of BCSSA activities.

6) PROVISIONS

- a) Accountability

BCSSA is responsible for maintaining and protecting the personal information under its control. Accountability for this function within the organization is held by the Executive Director of BCSSA.

- b) Identifying Purpose

BCSSA will identify to an individual the purposes for which personal information is collected at, or before, the time the information is collected. Generally, BCSSA collects personal information for the following purpose:

- registration of Members as defined in the By-Laws and Policies and Procedures of BCSSA.
- to process registrations for competition, reporting to funders and running reports to capture member numbers;
- to manage and develop BCSSA's business and operations, including but not limited to personnel and employment matters and affairs with partners, funders and sponsors;

- to determine an individual's entitlement to BCSSA's services.
- to inform individuals about BCSSA programs and services that BCSSA believes may be of interest to them.
- to better understand an individual's interests in BCSSA's products and services.
- to develop, enhance or improve programs and services to better meet the needs of BCSSA members as defined with the By-Laws and Policies and Procedures of BCSSA..
- to meet legal and regulatory requirements; and
- to address specific circumstances that require such information to be collected and used.
- BCSSA collects or may collect personal information from individuals during the course of normal activities and for membership management. Information collected is but not limited to:
 - BCSSA/SSC member number
 - first name
 - last name
 - Gender
 - language preference
 - birth date
 - Address
 - phone number(s)
 - e-mail address
 - Parent or Guardian's name (if a Minor as defined by the Government of BC)
 - Parent or Guardian's address (If a Minor as defined by the Government of BC)
 - Medical information
- Additional information obtained may include levels of interest for our services and topics, and transaction activity with BCSSA.
- Credit card information or banking information may be collected and utilized for payment transactions for registration only. This information will not be stored without your consent,
- Additional information obtained may include levels of interest for our services and topics, and transaction activity with BCSSA.
- Credit card information or banking information may be collected and utilized for payment transactions for registration only. This information will not be stored without your consent,
- BCSSA/Speed Skating Canada uses cookies. A cookie is a small piece of information that is sent to your computer when you access a Web site. BCSSA/Speed Skating Canada utilizes a session cookie which is stored temporarily in your computer's

memory and allows you to remain logged in while using the BCSSA/Speed Skating Canada websites/databases – i.e. a person is not required to continuously log in as he or she navigates the pages on the website because these cookies are used. A session cookie is destroyed as soon as the browser is closed.

c. Consent

- i. An individual's knowledge and consent are required before BCSSA is allowed to collect, use or disclose his or her personal information.
- ii. Where possible, BCSSA/SSC will obtain consent directly from the individual concerned at the time of collection of personal information.
- iii. An individual has the right to withdraw consent at any time by providing reasonable notice to the BCSSA Executive Director. If a request to withdraw consent requires that BCSSA delete an individual's registration information, BCSSA will no longer be able to provide the programs, services or products for which an individual has subscribed. Cancellation will be subject to the terms and conditions of the registration or services provided, as applicable.
- iv. By registering in BCSSA, or subscribing to any potential association reports or member services, or otherwise indicating approval, individuals consent to the collection and use of their personal information for the purposes identified in this Policy.
- v. BCSSA will not require an individual to consent to the collection, use or disclosure of personal information beyond what is required to provide its products, programs or services.
- vi. In limited circumstances, BCSSA may use or disclose personal information without the knowledge or consent of the individual, for example, as required by governmental bodies acting with authority, or as authorized or required by applicable legislation.

d. Limiting Collection

- i. BCSSA collects only the information that is necessary for the purposes outlined in this Policy.

e. Limiting Use, Disclosure and Retention

- i. BCSSA does not use personal information for purposes other than those for which it was collected, except with an individual's consent or as required by law.
- ii. Once personal information is no longer required to fulfill the identified purposes or other legal requirements, it will be destroyed, deleted or made anonymous.
- iii. Personal information is shared with external service providers only to the extent required for the provision of such services. Furthermore, BCSSA does not sell personal information to a third-party organization. In certain circumstances, BCSSA allows basic contact information to be shared amongst Members. Examples of this include providing skater lists for competitions to other participants or sharing contact information amongst members of the BCSSA administrative networks, or Boards of Directors and staff, to facilitate ongoing communication.
- iv. Personal information is retained only as long as necessary for the fulfillment of the purposes stated in this Policy.
- v. Personal information collected through IceReg will be used by system administrators in member Clubs and at the BCSSA to process registrations for competition, to generate

reports to funders, to promote sponsor products or services, to generate statistical reports and to capture member numbers.

f. Accuracy of Personal Information

- i. Personal information is kept as accurate, complete and up to date as necessary for the purposes for which it is to be used. Individuals are encouraged to provide updates to their personal information as changes occur to enable continued service from BCSSA.
- ii. The personal information of individuals registered with BCSSA and Speed Skating Canada can be reviewed and modified, as required.

g) Safeguarding Personal Information

I. Personal information, whatever its form, will be protected by security safeguards 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. The measures of protection include:

- ii. physical measures, for example, locking filing cabinets and restricted access to offices;
- iii. organizational measures, for example, limiting access to the personal information on a “need-to-know” basis;
- iv. technological measures, for example, the use of passwords and encryption; and
- v. procedural measures, for example, the shredding of sensitive personal information when applicable.

IceReg (SSC) and the skater database (BCSSA) will have the following specific security measures implemented to protect an individual’s electronic personal information:

- All SSC information is stored in a dedicated SSC Database residing in the Interpodia Data Centre, under contract to Speed Skating Canada.
- All BCSSA information is stored in a dedicated BCSSA database residing with Adroit Technologies (ATWS).
- The SSC database is located in a High Security Zone that is only accessible by secure VPN connection, and to the web servers in the Demilitarized Zone.
- This Data Centre location is physically secure and located in what was formerly a bank.
- The Data Centre is 100% Canadian owned and operated.
- Backups of the database are performed regularly but reside within the High Security Zone.
- From time to time, or upon request, an offsite backup may be initiated for disaster recovery purposes.
- When doing so all information is encrypted and the information will be stored in a location with comparable security.

h) Openness

BCSSA is committed to being open about its policies and practices with respect to the collecting and handling of personal information.

This Policy is available on the BCSSA Website.

If additional information is required by an individual, requests for such information may be made by writing to the Executive Director of BCSSA.

i) Access to Personal Information

Individuals may request a copy of their personal information held at BCSSA/Speed Skating Canada by submitting a written request to the BCSSA Executive Director.

Acceptable proof of identification is required before such information is provided.

If the information is inaccurate, an individual may request that it be reviewed and, if inaccurate, changed by writing to the BCSSA Executive Director.

j) Challenging Compliance

An individual can challenge compliance with the above policy by providing written details of the challenge to the BCSSA Executive Director.

7) REVIEW AND APPROVAL

a) The BCSSA Board of Directors and the Executive Director shall review this policy biennially.

b) This Policy and any amendments to it require approval by the Board of Directors prior to its coming into force.

8) COMMUNICATION OF THE POLICY

a) This Policy will be posted in the Policies and Procedures Governance section of the BCSSA Website.

RATIONALE:

PROPOSED BY:

RESULT:

DATE: