



PIPEDA Policy

Purpose of Policy

Privacy of personal information is governed by the Personal Information Protection and Electronics Documents Act (“PIPEDA”). This policy describes the ways in which Ontario Water Polo Association collects, uses, retains, safeguards, discloses and disposes of personal information, and states Ontario Water Polo’s commitment to collecting, using and disclosing personal information responsibly. This policy is based on the standards required by PIPEDA, and Ontario Water Polo’s interpretation of these responsibilities.

A copy of Ontario Water Polo Association’s Privacy Policy is provided to any member on request to Ontario Water Polo Association.

Background

Our organization, Ontario Water Polo Association, is the governing body for the sport of Water Polo in Ontario, and provides these services to its members and the public:

- Arranges and encourages Water Polo matches and competitions within Ontario;
- Fair and equal access to participate in competition, coaching and officiating;
- Provide leadership opportunities for athletes to develop and grow;
- Seeks affiliation with other organizations with a view to the promotion of the game of Water Polo; and
- Encourages and promotes proficiency and excellence by Canadians in all aspects of the game of Water Polo;

Personal Information

Personal information is information about an identifiable individual. Personal information includes information that relates to their personal characteristics (e.g., gender, age, income, home address or phone number, ethnic background, family status), their health (e.g., health history, health conditions, health services received by them) or their activities and views (e.g., religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information, however, does not include business information (e.g., an individual’s business address and telephone number), which is not protected by privacy legislation.

Accountability

An active Board member is the Privacy Officer and is responsible for monitoring information collection and data security, and ensuring that all staff receives appropriate training on privacy issues and their responsibilities. The Privacy Officer also handles personal

information access requests and complaints. The Privacy Officer may be contacted at privacy@ontariowaterpolo.ca or by calling 416-426-7028

Purpose

Personal information will only be collected by Ontario Water Polo to meet and maintain the highest standard of organization and programming for the sport of Water Polo. Ontario Water Polo collects personal information from prospective members, coaches, referees, participants, managers and volunteers for purposes that include, but are not limited to, the following:

- Name, address, phone number, cell phone number, fax number and e-mail address for the purpose of providing information from Ontario Water Polo Association for promotions, sponsorship, programs and events.
- Athlete information including height, uniform size, shoe size, feedback from coaches and trainers, performance results and biography information for outfitting uniforms, media relations, and components of team selection.
- Athlete whereabouts information including sport/discipline, training times and venues, training camp dates and locations, travel plans, competition schedule, and disability, if applicable, for Canadian Centre for Ethics in Sport inquiries for the purpose of out-of-competition doping testing.
- NCCP number, education, resumes and experience for database entry at the Coaching Association of Canada to determine level of certification and coaching qualifications.
- e) Credit card information for purchasing equipment and for registration at leagues and tournaments and other events.
- Date of birth and athlete biography for media releases and to determine age group.
- Banking information and social insurance number for Ontario Water Polo Association's payroll.
- Personal health information including provincial health card numbers, allergies, emergency contact and past medical history for use in the case of medical emergency.
- Marketing information including attitudinal and demographic data on individual members to determine membership demographic structure, and program wants and needs.
- Advertisements - Individuals providing their addresses or e-mail addresses to Ontario Water Polo shall receive advertisements from Ontario Water Polo, an alumni letter, a news-letter and donation request for the purpose of fundraising.

If a purpose has not been identified herein, Ontario Water Polo Association will seek consent from individuals when personal information is used for a purpose not already consented to. This consent will be documented as to when and how it was received.

Consent

- Consent is required to be obtained by lawful means from individuals at the time of collection, prior to the use or disclosure of the personal information. If the consent to the collection, use or disclosure was not obtained upon receipt of the information, consent will be obtained prior to the use or disclosure of that information. Ontario Water Polo may collect personal information without consent where reasonable to do so and where permitted by law.
- By providing personal information to Ontario Water Polo, individuals are consenting to the use of the information for the purposes identified in this policy.
- In determining the form of consent to use, Ontario Water Polo Association will take into account the sensitivity of the information.
- Ontario Water Polo Association will not, as a condition of a product or service, require an individual to consent to the collection, use or disclosure of information beyond that required to fulfill the specified purpose.
- An individual may withdraw consent to the collection, use or disclosure of personal information at any time, subject to legal or contractual restrictions, provided the individual gives one week's notice of such withdrawal to Ontario Water Polo. The Privacy Officer will advise the individual of the implications of such withdrawal.

Limiting Collection

All personal information will be collected fairly, by lawful means and for the purposes as specified in this policy. Ontario Water Polo will not use any form of deception to obtain personal information.

Limiting Use, Disclosure and Retention

Personal information will not be used or disclosed by Ontario Water Polo for purposes other than those for which it was collected as described herein, except with the consent of the individual or as required by law.

Information disclosed to a third party with consent from the individual shall be protected by a third party agreement to limit use and disclosure.

Personal information will be retained for certain periods of time in accordance with the following:

- Registration data and athlete information will be retained for a period of three years after an individual has left a program of Ontario Water Polo, in the event that the individual chooses to return to the program;



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- Parental/family information will be retained for a period of three years after an individual has left a program of Ontario Water Polo, in the event that the individual chooses to return to the program;
- Information collected by coaches will be retained for a period of three years after an individual has left a program of Ontario Water Polo, in the event that the individual chooses to return to the program.
- Athlete whereabouts information shall be destroyed immediately upon an individual leaving a program of Ontario Water Polo.
- Coaching and officials personal information shall be retained for a period of three years after an individual has left a program of Ontario Water Polo, in the event that the individual chooses to return to the program;
- Employee information will be retained for a period of seven years in accordance with Canada Customs and Revenue Agency requirements.
- Personal health information will be immediately destroyed when an individual chooses to leave a program of Ontario Water Polo.
- Marketing information will be immediately destroyed upon compilation and analysis of collected information.
- Credit card information shall be destroyed immediately after use.
- As otherwise may be stipulated in federal or provincial legislation.

Personal information that is used to make a decision about an individual will be maintained for a minimum of one year of time to allow the individual access to the information after the decision has been made.

Ontario Water Polo may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where Ontario Water Polo has reasonable grounds to believe the information could be useful in the investigation of an unlawful activity, or to comply with a subpoena or warrant or an order made by the court or otherwise as permitted by applicable law.

Documents will be destroyed by way of shredding and electronic files will be deleted in their entirety. When hardware is discarded, Ontario Water Polo will ensure that the hard drive is physically destroyed.

Accuracy

Ontario Water Polo will use accurate and up-to-date information as is necessary for the purposes for which it is to be used, to minimize the possibility that inappropriate information may be used to make a decision about an individual.

Safeguards

Personal information is protected by security safeguards appropriate to the sensitivity of the information against loss or theft, unauthorized access, disclosure, copying, use or modification.

Methods of protection and safeguards include, but are not limited to, locked filing cabinets, restricted access to offices, security clearances, need-to-know access and technological measures including the use of passwords, encryption and firewalls.

The following steps will be taken to ensure security:

- Paper information is either under supervision or secured in a locked or restricted area.
- Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers.
- Paper information is transmitted through sealed, addressed envelopes or in boxes by reputable courier/delivery companies.
- Electronic information is transmitted either through a direct line or is encrypted.
- Staff is trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with this policy.
- External consultants and agencies with access to personal information will provide Ontario Water Polo with appropriate privacy assurances.

Openness

Ontario Water Polo will publicize information about its policies and practices relating to the management of personal information. This information is on Ontario Water Polo's web site or upon request by contacting the Privacy Officer, privacy@ontariowaterpolo.ca or by calling 416-426-7028

The information available to the public includes:

- The name or title, address and telephone number of Ontario Water Polo's Privacy Officer.
- The forms that may be used to access personal information or change information.
- A description of the type of personal information held by Ontario Water Polo, including a general statement of its approved uses.

Individual Access

Upon written request, and with assistance from Ontario Water Polo Association, an individual may be informed of the existence, use and disclosure of his or her personal information and will be given access to that information. As well, an individual is entitled to be informed of the source of the personal information along with an account of third parties to whom the information has been disclosed.

Requested information will be disclosed to the individual within 30 days of receipt of the written request at no cost to the individual, or at nominal costs relating to photocopying expenses, unless there are reasonable grounds to extend the time limit.

If personal information is inaccurate or incomplete, it will be amended as required.

An individual may be denied access to his or her personal information if:

- This information is prohibitively costly to provide;
- The information contains references to other individuals.
- The information cannot be disclosed for legal, security or commercial proprietary purposes;
- The information is subject to solicitor-client or litigation privilege.

Upon refusal, Ontario Water Polo will inform the individual the reasons for the refusal and the associated provisions of PIPEDA.

Challenging Compliance

An individual may challenge Ontario Water Polo's compliance with this policy and PIPEDA, by submitting a challenge in writing to our Privacy Officer at privacy@ontariowaterpolo.ca or by fax at 416-426-7356

Upon receipt of a written complaint, Ontario Water Polo will:

- Record the date the complaint is received;
- Notify the Privacy Officer who will serve in a neutral, unbiased capacity to resolve the complaint;
- Acknowledge receipt of the complaint by way of telephone conversation and clarify the nature of the complaint within three days of receipt of the complaint;
- Appoint an investigator using Ontario Water Polo personnel or an independent investigator, who will have the skills necessary to conduct a fair and impartial investigation, and who will have unfettered access to all files and personnel, within ten days of receipt of the complaint.



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- Upon completion of the investigation and within 25 days of receipt of the complaint, the investigator will submit a written report to Ontario Water Polo.
- Notify the complainant of the outcome of the investigation and any relevant steps taken to rectify the complaint, including any amendments to policies and procedures, within 30 days of receipt of the complaint.

An individual may appeal a decision made by Ontario Water Polo under this Policy, in accordance with Ontario Water Polo's policies for appeals.

IP Address

When the user's web browser requests a web page from another computer on the Internet, it automatically gives that computer the address where it should send the information. This address is called the computer's "IP address."

Ontario Water Polo does not collect, use or disclose IP Addresses.

Cookies

Cookies are small text files that a Web browser transfers to and from your hard drive for record keeping purposes. Cookies make life easier for you by saving your passwords, purchases, and preferences while you're at our site. The use of cookies is an Internet standard, and you'll find cookies at most major Web sites.

The use of cookies is an industry standard and many major browsers are initially set up to accept them. You can reset your browser to either refuse to accept all cookies or to notify you when you have received a cookie. However, if you refuse to accept cookies, you may not be able to use some of the features available on websites.

Ontario Water Polo does not use cookies to identify specific individuals.

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Applicable Law

This site is created and controlled by Ontario Water Polo in the province of Ontario. As such, the laws of the province of Ontario will govern these disclaimers, terms and conditions, without giving effect to any principles of conflict of laws.