

SASKATCHEWAN ARTISTIC SWIMMING INC.

PRIVACY POLICY

PURPOSE OF THIS POLICY

1. To set rules for the collection and disclosure of personal information in a manner that recognizes the right of privacy of individuals in respect to their personal information and the need Saskatchewan Artistic Swimming must collect, use and/or disclose personal information.
2. To assure those from whom information is collected it will be protected and used for the intended purpose it was collected for, and other uses are subject to consent of the individual.

BACKGROUND

3. This organization, Saskatchewan Artistic Swimming, is the governing body for the sport of synchronized swimming in Saskatchewan and provides the following services to its members and the public:
 - a) Synchronized swimming competitions within Saskatchewan
 - b) The regulation and officiating of synchronized swimming within Saskatchewan
 - c) Development and accreditation of coaches and officials
 - d) Support and development of athletes and teams
 - e) Fair and equal access to participate in competition, coaching and officiating
 - f) Leadership opportunities for athletes to develop and grow
 - g) Affiliation with other organizations with a view to the promotion of synchronized swimming

PERSONAL INFORMATION

4. Personal information is information that will be used to contact, distinguish and make a specific individual identifiable. Personal information includes, but is not limited to, personal characteristics (income, ethnic background, family status), health (history, conditions, services received), and activities and beliefs (religion, politics, opinion, and evaluations). Personal information does not include business information, employee information or publicly available information. For example, names, addresses and telephone numbers published in telephone directories are not personal information. As well, if an individual provides home contact information as business contact information, it will be considered as business contact information and not held under protection as personal information.

ACCOUNTABILITY

5. The Privacy Officer (as named by the Board of Saskatchewan Artistic Swimming) is responsible for the monitoring of information collected, data security, and ensuring that all staff receives appropriate training on privacy issues and their responsibilities. The Privacy Officer also handles complaints and requests for personal information access. The Privacy Officer may be contacted at the following address:

Saskatchewan Artistic Swimming
#300 – 1734 Elphinstone St
Regina, SK S4T 1K1

APPLICATION

6. This policy applies to the personal information of existing and perspective members of Saskatchewan Artistic Swimming (coaches, officials, participants, officers, directors, volunteers, etc.). All board directors, officers, employees, committee members, volunteers, coaches, event organizers, contractors and other decision makers in association with Saskatchewan Artistic Swimming must follow this policy.

PIPEDA

7. The privacy of personal information is governed by the Personal Information Protection and Electronics Documents Act – PIPEDA. Saskatchewan Artistic Swimming, therefore, is governed by PIPEDA in all

matters involving the collection, use and disclosure of personal information in the course of carrying out commercial activities. Based on the standards required by PIPEDA and the interpretation of PIPEDA by Saskatchewan Artistic Swimming this policy was written.

PURPOSE FOR ACQUIRING INFORMATION

8. Personal information will be collected by Saskatchewan Artistic Swimming only to meet and maintain the highest standard of organizing and programming the sport of synchronized swimming. Saskatchewan Artistic Swimming collects personal information from prospective and existing members, coaches, referees, participants, managers and volunteers for purposes that may include, but are not limited to:
- a) Name, address, phone number, cell phone number, first language, fax number and email address for the purpose of receiving information from Saskatchewan Artistic Swimming
 - b) Nationality for statistics as required by Sport Canada
 - c) NCCP number, education, resumes and experience for database entry in the Coaching Association of Canada to determine the level of certification and coaching qualifications
 - d) General member numbers, CASSA numbers, resumes, length of eservice/participation, history, details of performance, certifications, awards won, details of participation, background and biographic information for the purpose of award nominations, bios or published articles
 - e) Credit card and chequing information for registration at conferences, purchasing equipment, coaching manuals and other resources, registration in courses, workshops, conferences, membership/athlete/club registration and travel
 - f) Date of birth and athlete biography for media releases and to determine appropriate age groups
 - g) Banking information, social insurance number, criminal records check, resume and beneficiaries for Saskatchewan Artistic Swimming's payroll, company insurance and health plan
 - h) Personal health information including provincial health card numbers, allergies, emergency contacts and past medical history for use in the case of medical emergency or byes
 - i) Personal health information for individuals with a disability in order to determine eligibility to compete and classification
 - j) Athlete information including category/level, height, dietary supplements taken, uniform size, shoe size, feedback from coaches and trainers, performance results, biography information and Saskatchewan Artistic Swimming registration number required for registration forms, outfitting uniforms, media relations, publishing results and components of selection
 - k) Athlete whereabouts information including sport/discipline, training times and venues, training camp dates and locations, travel plans, competition schedule and, if applicable, disability, for the Canadian Centre for Ethics in Sport inquiries for the purpose of out of competition drug testing
 - l) Individual measurements for adjusting equipment
 - m) Body weight, mass and body fat index to monitor physical response to training and to maintain an appropriate weight for competition
 - n) Marketing information including attitudinal and demographic data on individual members to determine a membership demographic structure, and program wants and needs
 - o) Passport numbers and Aeroplan/Air Miles/frequent flyer number for travel purposes
 - p) Addresses or email addresses may receive advertisements from Saskatchewan Artistic Swimming sponsors, an alumni letter, a newsletter and donation requests for the purpose of fundraising or awareness
 - q) Determining eligibility for certain events or activities
 - r) Video footage of competitions for the purpose of technical monitoring, coach/club review, officials training educational purposes, sport promotion. In some cases, videos from an event will be available for purchases
 - s) Photos for the purpose of educational training, reporting and marketing of the sport in newsletters, on the website, on displays or posters
 - t) Scores and rankings of individual athletes, coaches and clubs for record keeping, publishing of competing and identifying athletes.

- u) Names, ages and signatures for the purpose of participant agreements, permissions where medical treatment is concerned and the collection of waivers
 - v) Name and contact information for the purposes of communication, draws, raffles and fundraising events
9. If a purpose has not been identified herein, Saskatchewan Artistic Swimming will seek consent from individuals in order to use personal information for a purpose that is not already consented to. This consent will be documented as to when and how it was received.

CONSENT

10. Consent is required to be obtained by lawful means from individuals at the time of collection and will be obtained prior to the use or disclosure of the personal information. However, Saskatchewan Artistic Swimming may collect personal information without consent where it is reasonable and lawful. In cases such as when:
- a) It is clearly in the individual's interests and consent is not available in a timely way
 - b) Knowledge and consent would compromise the availability or accuracy of the information and collection is required to investigate a breach of an agreement or contravention of a federal or provincial law
 - c) The information is publicly available as specified in PIPEDA
 - d) The information is for journalistic, artistic or literary purposes
11. By providing personal information to Saskatchewan Artistic Swimming, individuals are consenting to the use of the information for the purposes identified in this policy.
12. Saskatchewan Artistic Swimming provides an opt-out option for individuals to choose to not have their information shared beyond the purposes with which it is explicitly collected for.
13. Consent may be written, oral or implied. In determining the form of consent to use, Saskatchewan Artistic Swimming will consider the sensitivity of the information, as well as the individual's reasonable expectations. Individuals may consent to the collection and specified use of personal information by:
- a) Signing an application form
 - b) Checking a check-off box
 - c) Providing written consent physically or electronically
 - d) Consenting orally over the telephone or in person
 - e) Implicitly consenting via actions
14. In some cases, Saskatchewan Artistic Swimming does not need consent to use personal information. Such cases include:
- a) When Saskatchewan Artistic Swimming has reasonable grounds to believe the information could be useful in an investigation of contravention of a federal, provincial or foreign law and the information is used for that investigation
 - b) An emergency that threatens an individual's life, health or security
 - c) Statistical or scholarly study or research (Saskatchewan Artistic Swimming must notify the Privacy Commissioner before using the information)
 - d) When it is publicly available as specified in PIPEDA
 - e) When the use is clearly in the individual's interest and consent is not available in a timely way
 - f) When knowledge and consent would compromise the availability or accuracy of the information and collection was required to investigate a breach of an agreement or contravention of a federal or provincial law
15. Saskatchewan Artistic Swimming may disclose personal information without the individual's knowledge or consent only to:
- a) A lawyer representing Saskatchewan Artistic Swimming
 - b) Collect a debt the individual owes to Saskatchewan Artistic Swimming

- c) Comply with a subpoena, a warrant or an order made by a court or other body with appropriate jurisdiction
 - d) A government institution that has requested the information, identified its lawful authority, and indicated that disclosure is for the purpose of enforcing, carrying out an investigation or gathering intelligence relating to any federal, provincial or foreign law; or that suspects that the information relates to national security or the conduct of international affairs; or is for the purpose of administering any federal or provincial law
 - e) An investigative body named in PIPEDA or a government institution or Saskatchewan Artistic Swimming's initiative when Saskatchewan Artistic Swimming believes the information concerns a breach of an agreement, or a contravention of a federal, provincial, or foreign law, or suspects the information relates to national security or the conduct of international affairs
 - f) An investigative body for the purposes related to the investigation of a breach of an agreement or a contravention of a federal or provincial law
 - g) An emergency threatening an individual's life, health or security (Saskatchewan Artistic Swimming must inform the individual of the disclosure)
 - h) Statistical, scholarly study, or research (Saskatchewan Artistic Swimming must notify the Privacy Commissioner before disclosing the information)
 - i) An archival institution
 - j) Twenty years after the individual's death or one hundred years after the record was created
 - k) If it is publicly available as specified in the regulations
 - l) If otherwise required by law
16. Saskatchewan Artistic Swimming 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 specific purpose.
17. 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 Saskatchewan Artistic Swimming. The Privacy Officer will advise the individual of the implications of such withdrawal, as it may affect an individual's ability to participate in programs or events.

LIMITING COLLECTION

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

LIMITING USE, DISCLOSURE AND RETENTION

19. Personal information will not be used or disclosed by Saskatchewan Artistic Swimming for purposes other than which it was collected as described herein, except with the consent of the individual, as required by law and the exceptions as described herein.
20. Information may be forwarded to volunteers in the association such as Meet Managers, Scorers, Referees, Officials, Meet Volunteers, Committee Members, the Board of Directors, Coaches, Session Leaders, etc., Provincial Associations for the purpose of clinics, competitions, International Federations, etc., Coaching Association of Canada, Award Organizations or other parties with whom this association deals.
21. Information disclosed to a third party with consent from the individual shall be protected by a third-party agreement to this disclosure.
22. Personal information will be retained for certain periods of time in accordance with the following:
- a) Registration data and athlete information will be retained for a period of three years after an individual has left the program in the event that the individual chooses to return to the program
 - b) Family information will be retained for a period of three years after an individual has left the program in the event that the individual chooses to return to the program

- c) Competitive results which includes athlete's names, levels and placements will be retained indefinitely for historical purposes
 - d) Credit card information will be destroyed immediately upon completion of a financial transaction
 - e) Information collected by coaches will be retained for a period of three years after an individual has left the program in the event that the individual chooses to return to the program and in order to communicate program and conference dates
 - f) Employee information will be retained for a period of seven years in accordance with Canada Customs and Revenue Agency requirements
 - g) Personal health information will be immediately destroyed in the event that the individual chooses to leave the program
 - h) Personal health information of paralympic athletes will be retained for a period of three years after an individual has left the program in the event that the individual chooses to return to the program
 - i) Coaches and officials certification information will be retained for period of ten years after an individual has left the program in the event that the individual chooses to return to the program or until such time as the individual indicates they will not be returning to the sport in that capacity
 - j) Marketing information will be immediately destroyed upon completion and analysis of collected information
 - k) As otherwise may be stipulated by provincial or federal legislation
23. Personal information that is used to make a decision about an individual will be maintained for a minimum of one year so the individual has access to the information after the decision has been made.
24. Paper documents will be destroyed by way of shredding and electronic files will be deleted in their entirety. When hardware is discarded, Saskatchewan Artistic Swimming will ensure that the hard drive is physically destroyed.

ACCURACY

25. Saskatchewan Artistic Swimming 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

26. 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.
27. 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 methods including the use of passwords, encryption and firewalls.
28. The following steps will be taken to ensure security:
- a) Paper information is either under supervision or secured in a locked or restricted area
 - b) Electronic hardware is either under supervision or secured in a locked or restricted area at all times and passwords are used on computers
 - c) Paper information is transmitted through sealed, addressed envelopes or in boxes by reputable courier/delivery companies
 - d) Electronic information is transmitted either through a direct line or is encrypted
 - e) The office staff is trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with this policy
 - f) External consultants and agencies with access to personal information will provide Saskatchewan Artistic Swimming with appropriate privacy assurances

OPENESS

29. Saskatchewan Artistic Swimming will publicize information about its policies and practices relating to the management of personal information. This information is available through this policy, on Saskatchewan Artistic Swimming's website or upon request by contacting the Privacy officer.

INDIVIDUAL ACCESS

30. Upon written consent and with the assistance from Synchro Canada an individual may be informed of the existence, use and disclosure of his or her personal information and will be given access to 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.
31. Requested information will be disclosed to the individual within thirty days from when Saskatchewan Artistic Swimming receives the written request at no cost to the individual or at nominal costs due to photocopying expenses, unless there is reasonable ground to extend the time limit. If personal information is inaccurate or incomplete, it will be amended as required.
32. An individual may be denied access if:
- a) The information is prohibitively costly to provide
 - b) The information contains references to other individuals
 - c) The information cannot be disclosed for legal security or commercial propriety purposes
 - d) The information is subject to solicitor client or litigation privilege
33. Upon the refusal for access, Saskatchewan Artistic Swimming will inform the individual the reasons for the refusal and the associated provision of PIPEDA.

CHALLENGING COMPLIANCE

34. An individual can challenge Saskatchewan Artistic Swimming's compliance with this policy and PIPEDA by submitting the challenge in writing to the Privacy Officer. Upon receiving a written complaint, Saskatchewan Artistic Swimming will:
- a) Record the date the complaint is received
 - b) The Privacy Officer will serve in a neutral, unbiased capacity to resolve the complaint
 - c) Acknowledge the receipt of the complaint by way of telephone conversation and clarify the nature of the complaint within five business days
 - d) Appoint an investigator using Saskatchewan Artistic Swimming personnel or an independent investigator and within twenty-five business days of receipt of the complaint, the investigator will submit a written report to Saskatchewan Artistic Swimming
 - e) 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 thirty days of receipt of the complaint
35. An individual may appeal a decision made by Saskatchewan Artistic Swimming by using the Saskatchewan Artistic Swimming's Appeal Policy.

IP ADDRESS AND COOKIES

36. Saskatchewan Artistic Swimming does not collect, use or disclose IP addresses, nor does Saskatchewan Artistic Swimming use cookies to identify specific individuals.

COPYRIGHT AND LEGAL DISCLAIMER

37. This website – synchrosask.com – is a product of Saskatchewan Artistic Swimming. Information on this website is provided as a resource for those interested in synchronized swimming. Saskatchewan Artistic Swimming disclaims any representation or warranty, expressed or implied, concerning the accuracy, completeness or fitness for a particular purpose of the information. Persons accessing this information assume full responsibility for the use of the information and understand and agree that Saskatchewan Artistic Swimming is not liable for any claim, loss or damage that may arise due to the use of this information. Saskatchewan Artistic Swimming reserves the right to make changes at any time without notice. Any reference to specific products, processes or services does not constitute or imply recommendation or endorsement by Saskatchewan Artistic Swimming. Some links on the Saskatchewan Artistic Swimming website may link to a website outside of the Saskatchewan Artistic Swimming website. Be aware that the Internet sites available through these links are not under the control of Saskatchewan Artistic Swimming. Therefore, Saskatchewan Artistic Swimming does not represent these sites or the materials available there. Saskatchewan Artistic Swimming provides these links only as a convenience to you, and in no way guarantees these links and the material available there. Saskatchewan Artistic Swimming is not responsible for the privacy practices employed by other companies or websites.

APPLICABLE LAW

38. The Saskatchewan Artistic Swimming website – synchrosask.com – is controlled and created by Saskatchewan Artistic Swimming in the province of Saskatchewan. Therefore, the laws of the province of Saskatchewan govern these disclaimers, conditions and terms, without giving effect to principles of conflict of laws.