



Privacy Policy – *Approved by the Board of Directors October 26, 2016*

Purpose of the Privacy Policy

1. The Ontario Speed Skating Association recognizes the importance of, and is committed to, maintaining the accuracy, confidentiality, and security of personal information.
2. The Ontario Speed Skating Association 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 the Ontario Speed Skating Association during the course of Ontario Speed Skating 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 the Ontario Speed Skating Association shall adhere to all relevant legislative privacy requirements, referencing the 10 Canadian Standards Association (CSA) principles.

Scope

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

Principles

Accountability

10. The Ontario Speed Skating Association is responsible for the personal information under its control. Furthermore, all Ontario Speed Skating Association employees and 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 this policy and relevant procedures.

11. The Ontario Speed Skating Association shall designate a Privacy Officer to be accountable for the Ontario Speed Skating Association's compliance with the Act as follows:

- a. The Privacy Officer shall implement, monitor, and ensure compliance of the Ontario Speed Skating Association Privacy Policy.
- b. The Privacy Officer shall respond to access requests in accordance with this Policy.
- c. The Privacy Officer shall report to the President. Ultimate responsibility for Privacy issues shall reside with the Ontario Speed Skating Association Board of Directors.
- d. The identity of the Privacy Officer shall be fully disclosed and publicly accessible. The Privacy Officer of the Ontario Speed Skating Association is the Executive Director.

Privacy Officer
Ontario Speed Skating Association
214 Bond Street East
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Tel: 844-677-6772
Email: ossa@ontariospeedskating.ca

- e. The Privacy Officer shall ensure all personal information possessed by the Ontario Speed Skating Association is managed in accordance with this Policy, including that which may be transferred to a third party.
- f. The Privacy Officer shall ensure that third party organizations (such as, but not limited to, Insurance Carriers, Canadian Centre for Ethics in Sport, and Coaching Association of Canada,) that handle information on behalf of the Ontario Speed Skating Association meet or exceed the standards of the Ontario Speed Skating Association. Third party organizations shall be mandated to adopt the Privacy Policy of the Ontario Speed Skating Association or create their own with the proviso that it meets or exceeds that of the Ontario Speed Skating Association.
- g. The Privacy Officer shall ensure adherence to this Policy by training staff, developing critical pathways for complaints and/or inquiries, and designing security measures to protect personal information possessed by the Ontario Speed Skating Association.

Identifying Purposes

12. The purpose for which personal information is collected shall be identified by the Ontario Speed Skating Association at or before the time the information is collected.
13. The Ontario Speed Skating Association shall only collect information pertinent to its speed skating programming and services.
14. The Ontario Speed Skating Association 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 the Ontario Speed Skating Association collects personal information for the following purposes:

- a. registration of members as defined in the By-Laws 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, 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 the Ontario Speed Skating Association being funded by the Ontario Speed Skating Association, the Ministry of Tourism, Culture and Sport or any other funding body working with or providing support to 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 manage and develop the Ontario Speed Skating Association's business and operations, including but not limited to personnel and employment matters and affairs with partners, funders and sponsors;
- f. to inform individuals about programs, activities and services the Ontario Speed Skating Association or one of its Clubs that are believed to be of potential interest or value to them;
- g. to better understand an individual's interests in the Ontario Speed Skating Association's products, activities and services or those of its Clubs;
- h. to develop, enhance or improve programs, activities and services of the Ontario Speed Skating Association to better meet the needs of individuals, members and clubs;
- i. to report to sponsors, partners, funders and donors as may be necessary, in aggregate, non-identifiable terms;
- j. to permit Clubs to manage their membership lists and carry out their respective operations and activities in a fashion consistent with this Policy and on a basis that provides for compliance with the principles in this Policy;
- k. to meet legal and regulatory requirements;
- l. to meet the requirements of prudent information retention practices; and
- m. to address specific circumstances that require such information to be collected and used as necessary or as appropriate.

16. The Ontario Speed Skating Association collects or may collect the following personal information from individuals during the course of normal activities and for membership management:

- a. name, address, phone numbers, email address, date of birth, gender, and language preference of members
- b. name, email, phone number and address of parents or legal guardian if a member has not yet reached their eighteenth birthday as of July 1
- c. personal health information including provincial health card numbers, allergies, emergency contact, past medical history for use in the case of an medical emergency
- d. health and medical concerns or circumstances relevant to their activities as a member
- e. emergency contact information such as the names, addresses, phone numbers, and email addresses
- f. 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 purposes of out-of-competition drug testing

- g. ethnicity/race (self-identify, optional)
 - h. special needs/disability (self-identify, optional)
 - i. gender identity (self-identify, optional)
 - j. salary, education, work experience and other typical human resources information of the employees of the Ontario Speed Skating Association
 - k. name, address, phone numbers, and email address of officials, coaches, and administrators to determine geographical, division of participation, and level of certification and coaching qualifications, are consistent with the Ontario Speed Skating Association regulations.
 - l. information on training, education, work experience, volunteer experience and qualifications, for volunteers, officials and coaches
 - m. “personal bests” and other results and times, as well as information about training programs, testing results and other typical training information
 - n. documents and their information provided to the Ontario Speed Skating Association or a Club including a Code of Conduct Agreement, Waiver (e.g. Liability Waiver, Photo Release) and in limited circumstances where identified as confidential, conflict of interest information
17. Credit card information or banking information may be collected and utilized for payment transactions for registration and other financial transactions only. This information will not be stored.
18. The Ontario Speed Skating Association uses the Speed Skating Canada membership system to collect and store information through web servers based in Canada. This information may be used for the purposes identified in this policy.
19. Speed Skating Canada’s website (www.speedskating.ca) and its online Member Management system (the Database) use cookies. A cookie is a small piece of information that is sent to a user’s computer when he or she accesses a Web site. Speed Skating Canada utilizes a session cookie which is stored temporarily in a user’s computer’s memory and allows him or her to remain logged in while using the website – i.e. a user is not required to continuously log in as one navigates the pages on the website because these cookies are used. A session cookie is destroyed as soon as a user closes his or her browser.

Consent

20. An individual’s knowledge and consent are required before the Ontario Speed Skating Association is allowed to collect, use or disclose his or her personal information.
21. Where possible, the Ontario Speed Skating Association 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 the Ontario Speed Skating Association’s Privacy Officer. If a request to withdraw consent requires that the Ontario Speed Skating Association delete an individual’s registration information, the Ontario Speed Skating Association 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, the Ontario Speed Skating Association 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 the Ontario Speed Skating Association so long as

required by the prudent information retention practices of the Ontario Speed Skating Association.

25. By registering in or by allowing themselves to be registered in the Ontario Speed Skating Association through the Database, or subscribing to any reports or services, by providing personal information to the Ontario Speed Skating Association, 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 the Ontario Speed Skating Association 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 the Ontario Speed Skating Association, 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 the Ontario Speed Skating Association in the course of its activities.
27. The Ontario Speed Skating Association 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 the Ontario Speed Skating Association or its Clubs.
28. The Ontario Speed Skating Association 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. The Ontario Speed Skating Association 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. The Ontario Speed Skating Association 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. The Ontario Speed Skating Association 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, the Ontario Speed Skating Association 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, the Ontario Speed Skating Association allows basic contact information of members to be shared amongst staff and volunteers who are members or clubs under this Policy. Examples of this include providing skater lists for competitions to other clubs or sharing contact information amongst members of the Ontario Speed Skating Association administrative networks, Boards of Directors and staff, or committees to facilitate ongoing communication. This Policy requires that such individuals use that information exclusively for carrying out the activities of the Ontario Speed Skating Association or a Club, 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 in Clubs, and the Ontario Speed Skating Association 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 the Ontario Speed Skating Association and its service-providers to communicate information and news relevant to individuals, including the events and activities of the Ontario Speed Skating Association, its members and clubs, and partners, funders and sponsors.
39. Personal information may be provided to designated staff, directors of clubs, and the Ontario Speed Skating Association 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 the Ontario Speed Skating Association.

Safeguarding Personal Information

42. The Ontario Speed Skating Association 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 the Ontario Speed Skating Association 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.peloton-technologies.com/Pages/Policy.aspx>

Openness

45. The Ontario Speed Skating Association 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 Ontario Speed Skating Association Website.
47. If additional information is required, requests for such information may be made to the Privacy Officer.

Access to Personal Information

48. Individuals may request a copy of their personal information held by the Ontario Speed Skating Association by submitting a written request to the Privacy Officer at the address posted on the Ontario Speed Skating Association'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 the Ontario Speed Skating Association's Privacy Officer to update the information. Where information is subject to interpretation or is an opinion, the Ontario Speed Skating Association 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 the Ontario Speed Skating Association determines that the disclosure of personal information should be refused, the Ontario Speed Skating Association 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 the Privacy Officer.

55. Upon receipt of a challenge, the Ontario Speed Skating Association's Privacy Officer shall acknowledge receipt of the complaint, clarify the nature of the complaint, and make the complaint procedures readily available and accessible.

56. The Privacy Officer 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. The Privacy Officer shall submit a written report to the Ontario Speed Skating Association President within twenty-eight (28) days of receipt of the complaint.

58. The Privacy Officer 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.