



BC Adaptive Snowsports

Personal Information Protection Policy



At BC Adaptive Snowsports (BCAS), we are committed to providing our members, clients and customers with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our members, clients and customers, protecting their personal information is one of our highest priorities.

While we have always respected our members, clients and customers privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

We will inform our members, clients and customers of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting members, clients and customers personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our members', clients' and customers' personal information and allowing our members, clients and customers to request access to, and correction of, their personal information.

Scope of this Policy

This Personal Information Protection Policy applies to BCAS. This policy also applies to any service providers collecting, using or disclosing personal information on behalf of BCAS.

Definitions

Personal Information – means 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 contact information.

Contact information – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.

Privacy Officer – means the individual designated responsibility for ensuring that BCAS complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the member, client and customer voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 We will only collect member, client and customer information that is necessary to fulfill the following purposes:
- a. Name, address, phone number, cell phone number, fax number, e-mail address and disability information for the purpose of communicating and reporting about BC Adaptive Snowsport membership, programs, events and activities.
 - b. Instructor certification number, education, resumes and experience for database entry to determine level of certification and qualifications.
 - c. Date of birth and athlete biography to determine eligibility, age group and appropriate level of participation.
 - d. Banking information, social insurance number, criminal records check, resume, and beneficiaries for BC Adaptive Snowsports' payroll, company insurance and health plan.
 - e. Criminal records check and related personal reference information for the purpose of implementing BC Adaptive Snowsports' volunteer screening program.
 - f. Personal health information including allergy information, emergency contact and past medical history for use in the case of medical emergency.
 - g. Athlete information including height, weight, uniform size, shoe size, feedback from coaches and trainers, performance results for athlete registration forms, outfitting uniforms, media relations, and various components of athlete and team selection.
 - h. 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.
 - i. Body weight, mass and body fat index to monitor physical response to training and to maintain an appropriate weight for competition.
 - j. Marketing information including attitudinal and demographic data on individual members, clients and customers to determine membership demographic structure, and program wants and needs.
 - k. Name, address, phone number, cell phone number, fax number and e-mail address for the purpose of providing insurance coverage, managing insurance claims and conducting insurance investigations.

Policy 2 – Consent

- 2.1 We will obtain member, client, and customer consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided *orally, in writing, electronically, through an authorized representative* or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the member, client or customer voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a member, client or customer is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, marketing and fundraising, and the member, client, customer does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), members, clients and customers can withhold or withdraw their consent for BCAS to use their personal information in certain ways. A member, client or customer decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the member, client, customer in making the decision.
- 2.5 We may collect, use or disclose personal information without the member's, client's or customer's knowledge or consent in the following limited circumstances:
- When the collection, use or disclosure of personal information is permitted or required by law;
 - In an emergency that threatens an individual's life, health, or personal security;
 - When the personal information is available from a public source (e.g., a telephone directory);
 - When we require legal advice from a lawyer;
 - For the purposes of collecting a debt;
 - To protect ourselves from fraud;
 - To investigate an anticipated breach of an agreement or a contravention of law

Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only use or disclose member, client or customer personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as:
- Fulfillment of membership, client or customer reporting requirements for provincial and/or federal governments;
 - To conduct member, client or customer surveys in order to enhance the provision of our services;
 - To contact our members, clients or customers directly about services or products that may be of interest;
- 3.2 We will not use or disclose member, client or customer personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We will not sell member, client or customer lists or personal information to other parties.

Policy 4 – Retaining Personal Information

- 4.1 If we use member, client or customer personal information to make a decision that directly affects the member, client or customer, we will retain that personal information for at least one year so that the member, client or customer has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain member, client or customer personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

Policy 5 – Ensuring Accuracy of Personal Information

- 5.1 We will make reasonable efforts to ensure that member, client or customer personal information is accurate and complete where it may be used to make a decision about the member, client, and customer or disclosed to another organization.
- 5.2 Members, clients and customers may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought. A request to correct personal information should be forwarded to the BCAS Privacy Officer
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the members, clients or customers correction request in the file.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of member, client and customer personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 The following security measures will be followed to ensure that member, client or customer personal information is appropriately protected:

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

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. In addition, 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) 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 BC Adaptive Snowsports with appropriate privacy assurances
- 6.3 We will use appropriate security measures when destroying member, client or customer personal information such as shredding documents, deleting electronically stored information.
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Member, Client and Customer Access to Personal Information

7.1 Members, clients and customers have a right to access their personal information, subject to limited exceptions.

A full listing of the exceptions to access can be found in section 23 of PIPA. Some examples include: solicitor-client privilege, disclosure would reveal personal information about another individual, health and safety concerns.

7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Privacy Officer

7.3 Upon request, we will also tell members, clients or customers how we use their personal information and to whom it has been disclosed if applicable.

7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.

7.5 A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the member, client or customer of the cost and request further direction from the member, client or customer on whether or not we should proceed with the request.

7.6 If a request is refused in full or in part, we will notify the member in writing, providing the reasons for refusal and the recourse available to the member.

Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual

8.1 The Privacy Officer is responsible for ensuring BCAS compliance with this policy and the *Personal Information Protection Act*. The BCAS Privacy Officer is the organization's Chief Executive Officer.

8.2 Members, clients and customers should direct any complaints, concerns or questions regarding BCAS compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the member, client or customer may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for the BCAS Privacy Officer is:

Chief Executive Officer
BC Adaptive Snowsports
780 SW Marine Drive
Vancouver, B.C. V6P 5Y7