

18.0 PRIVACY POLICY

Date of Most Recent Update Approved by the Board of Directors: February 13 2024

Policy Section	Change	Policy Version #	Date Approved	Effective Date
All	New Policy	0	2002	2002
All	Policy Revisions	0.1 – 0.7	2003-2011	2003-2011
All	Split Policy into sections 1.0 – 23.0, Appendix A – G	1	2012	2012
All	Spelling, Punctuation	2	N/A	11/03/2017
All	Revisions to all sections and addition of new sections to be in accordance with provincial and federal legislation	3	Feb 13 2024	Feb 13 2024

SECTION 1 GENERAL

1.1 Background - Privacy of personal information is governed by the *Personal Information Protection and Electronics Documents Act* ("PIPEDA") and the *Personal Information Privacy Act* ("PIPA"). This policy describes the way that Ringette Alberta collects, uses, safeguards, discloses and disposes of personal information, and states Ringette Alberta's commitment to collecting, using and disclosing personal information responsibly. This policy is based on the standards required by PIPEDA and PIPA, and Ringette Alberta's interpretation of these responsibilities.

RAB collects personal information for reasonable purposes and to the extent reasonably necessary for that purpose as outlined in Section 3.

1.2 Purpose - The purpose of this policy is to govern the collection, use, safeguarding, and disclosure of personal information in a manner that recognizes the right to privacy of individuals with respect to their personal information and the need of Ringette Alberta to collect, use or disclose personal information.

1.3 Definitions - The following terms have these meanings in this Policy:

- a. "Club" – Associations registered under Ringette Alberta
- b. *Personal Information* – any information about an identifiable individual including information that relates to their personal characteristics including, but not limited to, gender, age, income, home address or phone number, ethnic background, family status, health history and health conditions.

- c. *PIPA - Personal Information Privacy Act, SA 2003, c P-65.*
- d. *PIPEDA – Personal Information Protection and Electronic Documents Act, SC 2000, c 5.*

e. *Representatives* – Organizational Participants such as all categories of Member defined in the By-laws and Policies of Ringette Alberta and all individuals who are subject to the Governing Documents and Policies of Ringette Alberta. This includes all people employed by, contracted by, or engaged in activities sanctioned by Ringette Alberta and its Members including, but not limited to, employees, contractors, athletes, coaches, facilitators, evaluators, instructors, officials, volunteers, managers, administrators, committee members, parents or guardians, spectators, committee members, and Directors and Officers.

1.4 Applicability - This Policy applies to all Representatives in connection with personal information that is collected, used or disclosed during any activity related to Ringette Alberta or its Member Associations.

1.5 Statutory Obligations - Ringette Alberta is governed by the *Personal Information Protection, Electronic Documents Act* and Alberta's *Personal Information Privacy Act* in matters involving the collection, use and disclosure of personal information.

1.6 Additional Obligations - In addition to fulfilling all requirements of PIPEDA and PIPA, Ringette Alberta will also fulfill the additional requirements of this Policy.

Representatives of Ringette Alberta and its Member Associations will **not**:

- a. Disclose personal information to a third party during any business or transaction unless such business, transaction or other interest is properly consented to in accordance with this Policy;
- b. Knowingly place themselves in a position where they are under obligation to any organization to disclose personal information;
- c. In the performance of their official duties, disclose personal information to family members, friends or colleagues, or to organizations in which their family members, friends or colleagues have an interest;
- d. Derive personal benefit from personal information that they have acquired during the course of fulfilling their duties with Ringette Alberta; and
- e. Accept any gift or favor that could be construed as being given in anticipation of, or in recognition for, the disclosure of personal information.

1.7 Policy Interpretation - Except as provided in PIPEDA and PIPA, the Board of Directors of Ringette Alberta will have the authority to interpret any provision of this Policy that is contradictory, ambiguous, or unclear.

SECTION 2 ACCOUNTABILITY

2.1 Privacy Officer - The Privacy Officer is responsible for the implementation of this policy and 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 is the Executive Director.

2.2 Duties - The Privacy Officer will:

- a. Implement procedures to protect personal information;
- b. Establish procedures to receive and respond to complaints and inquiries;
- c. Record all persons having access to personal information;
- d. Ensure any third party providers abide by this policy; and
- e. Train and communicate to staff information about Ringette Alberta privacy policies and practices.

SECTION 3 IDENTIFYING PURPOSES FOR COLLECTION

3.1 Purpose – Personal information, including images, likeness or other identifiable attributes, may be collected from Representatives and prospective Representatives for purposes that include, but are not limited to, the following:

- a. Receiving and/or sending communications from Ringette Alberta in regards to E-news, newsletters, programs, events and activities.
- b. Application of Ringette Alberta Policies including, but not exclusive to Ringette Alberta Safe Sport policies.
- c. Inter Club communications between Representatives for managing and arranging activities, programs, and events.
- d. Database entry at the Coaching Association of Canada to determine level of coaching certification and qualifications.

- e. Database entry to determine level of officiating certification and qualifications.
- f. Determination of eligibility, age group and appropriate level of competition.
- g. Implementation of Ringette Alberta screening program.
- h. Implementation of anti-doping policies and drug testing
- i. Promotion and sale of merchandise.
- j. Medical emergency.
- k. Athlete registration with Ringette Alberta, Zone Association (if applicable) and Ringette Canada.
- l. Outfitting uniforms, and various components of athlete and team selection.
- m. Purchasing equipment, manuals, resources and other products.
- n. Published articles, media relations and posting on Ringette Alberta website, displays or posters.
- o. Determination of membership demographics and program wants and needs.
- p. Managing insurance claims and insurance investigations.

3.2 Purposes Not Identified –Ringette Alberta will seek consent from individuals when personal information is used for commercial purpose not previously identified. This consent will be documented as to when and how it was received.

SECTION 4 CONSENT

4.1 Consent –Ringette Alberta will obtain consent by lawful means from individuals at the time of collection and prior to the use or disclosure of this information. Ringette Alberta may collect personal information without consent where reasonable to do so and where permitted by law. When a registrant completes their registration on the RAMP online system, the registrant agrees that they have read and agree to abide by the Ringette Alberta Privacy Policy before the online system will allow completion of the registration.

4.2 Implied Consent – By providing personal information to Ringette Alberta, individuals are consenting to the use of the information for the purposes identified in this policy.

4.3 Requirement – Ringette Alberta will not, as a condition of a product or service, require an individual to consent to the collection, use or disclosure of personal information beyond that required to fulfill the specified purpose of the product or service.

4.4 Form – Consent may be written or implied. In determining the form of consent to use, Ringette Alberta will take into account the sensitivity of the information, as well as the individual's reasonable expectations. Individuals may consent to the collection and specified used of personal information in the following ways:

- a. Completing and/or signing an application form;
- b. Checking a check off box;
- c. Providing written consent either physically or electronically;
- d. Consenting orally in person; or
- e. Consenting orally over the phone.

4.5 Withdrawal – An individual may withdraw consent or vary their consent, in writing, to the collection, use or disclosure of personal information at any time, subject to legal or contractual restrictions. Ringette Alberta will inform the individual of the implications of such withdrawal.

4.6 Legal Guardians – Consent will not be obtained from individuals who are minors, seriously ill, or mentally incapacitated and therefore will be obtained from a parent, legal guardian or person having power of attorney.

4.7 Exceptions for Collection – Ringette Alberta is not required to obtain consent for the collection of personal information if:

- a. It is clearly in the individual's interests and consent is not available in a timely way; or
- 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; or
- c. The information is for journalistic, artistic or literary purposes; or
- d. The information is publicly available as specified in PIPEDA and PIPA or
- e. Other reasons specified in PIPA Section 13.

4.8 Exceptions for Use – Ringette Alberta may **use** personal information without the individual's knowledge or consent if the information is necessary to respond to an emergency that threatens the life, health, or security of an individual or the public, or in one or more of the following circumstances :

- a. If Ringette Alberta has reasonable grounds to believe the information could be useful when investigating a contravention of a federal, provincial or foreign law **and** the information is used for that investigation; or

- b. If Ringette Alberta has reasonable grounds to believe that information could be useful when investigating a contravention of Ringette Alberta Policies or Governing Documents
- c. For an emergency that threatens that individual's or other person's or persons' life, health, well-being, or security; or
- d. If it is publicly available as specified in PIPEDA and PIPA;
- e. If the use is clearly in the individual's interest and consent is not available in a timely way; or
- f. If 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.

4.9 Exceptions for Disclosure – Ringette Alberta may **disclose** personal information without the individual's knowledge or consent only:

- a. To a lawyer representing Ringette Alberta;
- b. To collect a debt the individual owes to Ringette Alberta;
- c. To comply with a subpoena, a warrant or an order made by a court or other body with appropriate jurisdiction;
- d. To 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. To an investigative body named in PIPEDA or PIPA or government institution when Ringette Alberta 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. To 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. In an emergency threatening an individual's life, health, or security (Ringette Alberta will inform the individual of the disclosure);
- h. To an archival institution;
- i. 20 years after the individual's death or 100 years after the record was created;
- j. If it is publicly available as specified in the regulations; or
- k. If otherwise required by law.

SECTION 5 LIMITING COLLECTION, USE, DISCLOSURE AND RETENTION

5.1 Limiting Collection, Use and Disclosure – Ringette Alberta shall not collect, use or disclose personal information indiscriminately. Information collected will be for the purposes specified in this Policy, except with the consent of the individual or as required by law.

5.2 Destruction (discarding) of information – physical records will be shredded either on-site at Ringette Alberta or with a service company. Electronic records in the RAMP registration system are removed according to procedural steps in RAMP required for safeguarding information

5.3 Retention Periods – Personal information will be retained by Ringette Alberta as long as reasonably necessary for Ringette Alberta to enable participation in Ringette Alberta, to maintain accurate historical records and or as may be required by law.

5.4 Exception – 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.

SECTION 6 ACCURACY and SAFEGUARDS

6.1 Accuracy – Personal information will be accurate, complete and as up to date 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 the individual.

SECTION 7 SAFEGUARDS

7.1 Safeguards – Personal information will be protected by security safeguards appropriate to the sensitivity of the information against loss or theft, unauthorized access, disclosure, copying, use or modification. Safeguards include software protection administered by RAMP and secure file storage for hard copy files. In the event of a breach, Ringette Alberta will inform the individuals whose information was disclosed and any necessary parties as required by legislation.

7.2 Employees – Employees will be made aware of the importance of maintaining personal confidential information and may be required to sign confidentiality agreements.

SECTION 8 OPENNESS

8.1 Information – Information made available will include:

- a. The name or title, and the address, of the person who is accountable for Ringette Alberta's privacy policy and practices and to whom complaints or inquiries can be forwarded;
- b. The means of gaining access to personal information held by the organization;
- c. A description of the type of personal information held by the organization, including a general account of its use;
- d. A copy of any information that explains the organization's privacy policies; and
- e. Third parties in which personal information is made available.

SECTION 9 INDIVIDUAL ACCESS

9.1 Access - Upon written request, and with assistance from Ringette Alberta, 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 through written or electronic format. 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.

9.2 Response - Requested information will be disclosed to the individual within 45 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.

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

- a. This 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 proprietary purposes;
- d. The information is subject to solicitor-client or litigation privilege.
- e. Threats of safety or life of an individual is reasonably expected

9.4 Reasons - Upon refusal, Ringette Alberta will inform the individual the reasons for the refusal and the associated provisions of PIPEDA and/or PIPA and applicable provincial privacy legislation.

9.5 Identity – Sufficient information will be required to confirm an individual’s identity prior to providing that individual an account of the existence, use, and disclosure of personal information.

SECTION 10 CHALLENGING COMPLIANCE

10.1 Challenges – An individual will be able to challenge compliance with this Policy to the Ringette Alberta Privacy Officer accountable for compliance.

10.2 Procedures – Upon receipt of a complaint Ringette Alberta will:

- a. Record the date the complaint is received;
- b. Acknowledge receipt of the complaint by way of telephone conversation or email and clarify the nature of the complaint within fourteen (14) days of receipt of the complaint;
- c. Upon receipt of the complaint, Ringette Alberta will notify the Privacy Officer if s/he is not already aware.
- d. Appoint an investigator using Ringette Alberta staff/volunteers or an external investigator, who will have the skills necessary to conduct a fair and impartial investigation and will have unfettered access to all necessary files.
- e. Upon completion of the investigation and within thirty (30) days of receipt of the complaint, the investigator will submit a written report to Ringette Alberta.
- f. Notify the complainant the outcome of the investigation and any relevant steps taken to rectify the complaint, including any amendments to policies and procedures.

10.3 Whistle-blowing – Ringette Alberta will not dismiss, suspend, demote, discipline, harass or otherwise disadvantage any Ringette Alberta Representative, and other decision-makers within Ringette Alberta or deny that person a benefit because the individual, acting in good faith and on the basis of reasonable belief:

- a. Disclosed to the commissioner that Ringette Alberta has contravened or is about to contravene the *Act*;
- b. Has done or stated an intention of doing anything that is required to be done in order to avoid having any person contravene the *Act*; or
- c. Has refused to do or stated an intention of refusing to do anything that is in contravention of the *Act*.

SECTION 11 COPYRIGHT AND LEGAL DISCLAIMER: Related to the RAMP Registration website

11.1 The RAMP web site is a product of Ringette Alberta. The information on this web site is provided as a resource to those interested in Ringette Alberta. Ringette Alberta disclaims any representation or warranty, express 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 Ringette Alberta is not responsible or liable for any claim, loss or damage arising from the use of this information. Reference to specific products, processes or services does not constitute or imply recommendation or endorsement by Ringette Alberta. Ringette Alberta also reserves the right to make changes at any time without notice.

11.2 Links made available through this website may allow you to leave Ringette Alberta site. Please be aware that the internet sites available through these links are not under the control of Ringette Alberta. Therefore, Ringette Alberta does not make any representation to you about these sites or the materials available there. Ringette Alberta is providing these links only as a convenience to you, and in no way guarantees these links and the material available there. Ringette Alberta is not responsible for privacy practices employed by other companies or websites.

SECTION 12 APPLICABLE LAW

14.1 This site is created and controlled by Ringette Alberta in the province of Alberta. As such, the laws of the province of Alberta will govern these disclaimers, terms and conditions.

SECTION 13 APPROVAL and REVIEW

15.1 This Policy was approved by the Board of Directors of Ringette Alberta.