

PERSONAL INFORMATION PROTECTION ACT (PIPA)

BC Rhythmic Sportive Gymnastics Federation (BCRSGF) Directors, Employees and Coaches to comply with, where applicable, the *Personal Information Protection Act* (PIPA). BCRSGF will hold in strict confidence and keep confidential all confidential information obtained by BCRSGF from any Member. BCRSGF will use its best efforts to ensure that only those of its employees, directors whose duties require them to know confidential information of the membership will have access thereto and will instruct such individuals to treat the same as confidential and to employ at least the same methods and degree of care as the receiving party employs to prevent the disclosure of its own confidential information.

PRIVACY POLICY AND PROCEDURES

1.0 PRIVACY STATEMENT. The collection, use, disclosure and retention of personal information are all regulated by law in British Columbia. BCRSGF collects and uses personal information primarily to enable provision of the programs, services, products and information for members of BCRSGF. PIPA defines personal information as information about an identifiable individual such as name, address, email, phone or image.

1.1 Principles of Privacy At BCRSGF, we value our relationship with our members and respect their privacy according to the following principles.

1.1.1 Accountability BCRSGF is accountable and responsible for the safeguarding of personal information in our custody or under our control. BCRSGF has appointed a Privacy Officer/Current President who is responsible for privacy issues within BCRSGF. BCRSGF has implemented procedures for the handling of personal information and has developed a complaint process for members with personal information concerns.

1.1.2 Purposes for Which Information is Collected BCRSGF collects personal information only for the following purposes:

- a. to establish and maintain a responsible relationship with our members and to provide ongoing service to all areas of gymnastics within British Columbia;
- b. to support and assist our member clubs in delivering programs and services at the local level;
- c. to support and assist Gymnastics Canada Gymnastique in delivering programs and services at the national and international levels;

1.1.3 Limits on Collection BCRSGF will limit the amount and type of personal information collected to that which is reasonable and necessary to fulfill its stated purposes.

1.1.4 Limits on Use and Disclosure BCRSGF uses personal information only for the purposes for which it is collected. Personal information may also be disclosed by BCRSGF for the following reasons:

- a. We may disclose a member's personal information to a person who, in the reasonable judgment of BCRSGF, is seeking the information as an agent of that member;
- b. We may disclose a member's personal information to a public authority or agent of a public authority if, in the reasonable judgment of BCRSGF, it appears that there is imminent danger to life or property, which could be avoided or minimized by disclosure of the information;
- c. In conjunction with special offers or programs, we may disclose members' personal information to our partners and associates or to third-party agents responsible for administering

such offers or programs. Any such disclosure is made with the member's consent and on a confidential basis and is limited to the information needed for the stated purpose;

1.1.5 Retention of Information BCRSGF will keep personal information used to make a decision about an individual for a minimum of one year. After one year, BCRSGF will destroy, erase or render anonymous personal information as soon as retention is no longer necessary.

1.1.6 Openness GBC is open about the policies and procedures it uses to protect your personal information. Information about our policies and procedures is available in writing and electronically.

1.1.7 Recourse BCRSGF has developed a complaint handling process. GBC will investigate all complaints received and take appropriate measures to correct information and handling practices as required. Individuals may appeal any BCRSGF decision to the Information and Privacy Commissioner of British Columbia.

1.2 Questions or Concerns If you have any questions or concerns about our privacy policy, please call us at (604) 333-3484 Otherwise, we will assume that we have your consent to continue to collect, use and disclose your personal information for the purposes identified above.

2.0 PRIVACY OFFICER

2.1 Privacy Officer The BCRSGF Privacy Officer is the current president.

The Privacy Officer is the person within BCRSGF whose job it is to:

- a. encourage compliance with provisions of the Personal Information Protection Act;
- b. respond to requests for access to and correction of personal information and general issues concerning personal information;
- c. manage BCRSGF's complaint process.

Duties The Privacy Officer may request delegation of duties to another individual, but approval must come in writing from the Board of Directors before such delegation can be made.

3.0 APPLICATION OF THE PRIVACY POLICY

3.1 Consent BCRSGF will make all reasonable effort to ensure that the purposes for personal information collection are stated at the time collection takes place.

3.1.1 Forms BCRSGF will include a statement of purpose on all appropriate forms as well as a provision for an individual to opt out of providing some personal information. This includes written and electronic forms.

3.1.2 Communications Materials Consent is not required to disclose information (including photos and videos) obtained by observation at a public event in which an individual voluntarily participates. However, as a courtesy, BCRSGF will endeavour to obtain consent to use personal information in its publications such as Layout, in communications materials such as posters and press releases and on its web site.

3.2 Sharing Information BCRSGF is responsible for personal information that we have collected and transferred to another organization. This may be a member club, Gymnastics Canada Gymnastique (GCG), partner, associate, sponsor, agent, or service contractor. In all cases, when transferring information, BCRSGF will clearly state what requirements must be met to comply with the legislation and with GBC's personal information management policy.

3.3 Handling Complaints about Personal Information

3.3.1 Initiating a Complaint Complaints about BCRSGF's management of personal information may be submitted in writing and should be directed to the BCRSGF Privacy Officer. The complaint must be submitted using the BCRSGF Complaint Form to ensure that the concern is documented thoroughly and with all relevant details. Initial complaints may be directed to members of staff, management, or to a representative of the Board of Directors who will pass them to the Privacy Officer or Assistant Privacy Officer as appropriate.

3.3.2 Investigating a Complaint Complaints may not be investigated by any person who may be named in the complaint.

a. The Privacy Officer (the "Investigator") will investigate all complaints received. The Investigator will acknowledge receipt of the complaint promptly, and may contact the individual to clarify the complaint if necessary.

b. The Investigator will be given access to all records, employees and others who handled the personal information or access request.

c. Where the complaint is justified, the Investigator will take appropriate measure to rectify the situation, including correcting information handling practices and policies where necessary and communicating those changes to relevant staff and volunteers. The Investigator will follow up to verify that the required changes have been implemented.

d. The Investigator will notify individuals of the results of an investigation clearly and promptly, informing them of relevant steps taken.

e. The Investigator will record all decisions to ensure consistency in applying the Act.

3.3.3 Requesting a Review Should an individual not be satisfied with the handling of their complaint, the Privacy Officer will inform them of the recourse they have to request a review by the Information and Privacy Commissioner of British Columbia. The Privacy Officer will provide the required contact information to a complainant wishing a review.

3.4 Security of Personal Information Personal information in BCRSGF custody or under BCRSGF control will be safeguarded with the appropriate level of security, according to whether the information is regarded as -low sensitivity," -medium sensitivity," or -high sensitivity." Security measures may include locked file cabinets, restricted access to offices, safety deposit boxes, and for computers: user ids and password-protected electronic files.

3.5 Retention of Personal Information The Act requires GBC to hold personal information for one year. For various legal purposes, BCRSGF holds all personal information for a minimum of two years. During that period, an individual has access to his or her personal information through the Privacy Officer and may correct errors of fact or lodge a complaint through BCRSGF's standard personal information complaint procedures. Selected personal information may be retained indefinitely. All retained personal information is subject to the rules and regulations of the Act regarding use, security and disclosure. Personal information may be retained indefinitely in the form of statistics for purposes of research and program and organizational development, and to support and assist partners and associates in their development programs. Personal information may also be retained indefinitely in the form of anonymous anecdotal information for research, training and organizational development.

3.6 Destruction of Personal Information Personal information no longer necessary to the purposes of BCRSGF will be destroyed, erased, or rendered anonymous.

a. BCRSGF will periodically clear its files of personal information that no longer needs to be retained. Written records or documentation containing personal information to be destroyed

will be shredded or burnt. Computer files containing personal information to be destroyed will be erased, and a file search conducted to ensure that all copies of the information are erased.

3.10 Collecting Information Without Consent According to the Act, BCRSGF may collect, use or disclose personal information without the consent of the individual for limited reasons. BCRSGF will waive obtaining consent on the following occasions.

- a. When collecting or disclosing the information clearly benefits you or is necessary for medical treatment and your consent cannot be obtained in a timely way.
- b. When the information is needed for a proceeding or an investigation and getting consent might compromise the availability or accuracy of the information.
- c. When the information is used for journalistic purposes and for no other purpose
- d. When the information is collected by observation at a competition or another public event in which the individual voluntarily participates
- e. When the information is necessary to determine the individual's suitability to receive an honour or award or be selected for an athletic purpose.