



## **RICHMOND JETS MINOR HOCKEY ASSOCIATION**

### **PRIVACY POLICY**

## PURPOSE OF THIS POLICY

This Policy describes the way that Richmond Jets Minor Hockey Association (“RJMHA”) collects, uses, retains, safeguards, discloses and disposes of the personal information of prospective members, members, and others including players, coaches, referees, managers and volunteers (“Individuals”). This Policy describes the way that RJMHA will, subject to applicable legal requirements, adhere to all relevant federal and provincial legislative privacy requirements. The Policy follows the 10 Canadian Standards Association (CSA) principles identified in the federal Personal Information Protection and Electronic Documents Act (PIPEDA). This Policy describes each principle and the method of implementing each.

### 1. ACCOUNTABILITY

a) The Secretary of RJMHA or her nominee (the “Privacy Officer”) will be responsible for the implementation and monitoring of the RJMHA Privacy Policy. This person will also be responsible for responding to access requests in accordance with this Policy. The Privacy Officer will report to the President, or designate and the ultimate responsibility for Privacy issues will rest with the RJMHA Board of Directors.

b) The RJMHA Privacy Officer will ensure that RJMHA manages all personal information in its possession in accordance with this Policy including that which may be transferred to a third party. Third party organizations who handle information on behalf of RJMHA shall be contractually obligated to adhere to the standards of RJMHA.

### 2. PURPOSES, TYPE OF INFORMATION COLLECTED AND WEBSITE

a) RJMHA will only collect Individual’s personal information reasonably necessary to carry out our purposes as stated in our constitution and operating policies, and to comply with applicable rules and regulations of Hockey Canada (HC), the British Columbia Amateur Hockey Association (BC Hockey), and Pacific Coast Amateur Hockey Association (PCAHA) (collectively “Hockey Programming”). Specifically:

- A player’s name, address and date of birth are collected to determine that the player’s geographical, division of play and level of play information are consistent with HC, BC Hockey, and PCAHA regulations.
- Historical information concerning past teams played for is collected in order to determine if any of the RJMHA transfer regulations may apply.

- Medical information concerning a player will be collected in order to ensure proper care in the event of a medical emergency.
- Information concerning an Individual's skill level and development and feedback on programs is collected to measure the success of our programs in order that we may better plan future programs.
- Information as to a player's parents' name, address, telephone numbers and email addresses may be collected in order to facilitate emergency contact information as well as to ensure compliance with the RJMHA residency regulations.
- Educational information may be collected in order to ensure all RJMHA residency regulations have been adhered to.
- E-mail addresses may be collected for the purposes of facilitating membership communication related to upcoming events and programs.
- Information about skill levels, ability, emergency contacts and health to ensure our activities are carried out in a safe and secure environment.
- Personal information collected for the purposes of hockey registrations may also be used for hockey specific research purposes including but not necessarily limited to hockey demographic type research.
- Certain personal information may be provided to third party service providers, including those who host hockey related clinics or programs for Individuals to ensure proper communication of events or programs, and to ensure such activities are carried out in a safe and secure environment.
- Affiliates. RJMHA is associated with many other hockey organizations, including, but not limited to HC, BC Hockey, PCAHA, Major Midgets, Vancouver Canucks, Canadian Inter-University Sport, Vancouver Giants, Richmond Sockeyes, and other provincial and local associations and leagues. RJMHA may disclose the personal information described above to all of these organizations in order to facilitate Hockey Programming and ensure compliance with rules and regulations.

b) RJMHA will endeavor to advise potential registration candidates of the purpose for the collection of the data requested at the time of registration or by reference to our web site at [www.richmondjetsmha.com](http://www.richmondjetsmha.com). We will further endeavor to ensure that all collectors of the personal information are familiar with the potential use of the personal data. All personal data collected by RJMHA shall be maintained by the responsible director or with our Privacy Officer.

c) RJMHA will request Individual permission for the use of any personal data collected which is extraneous to that which has been identified above, unless said usage is authorized by law.

d) RJMHA may also use information about an individual who accesses secure areas of our web site. Information you are asked to provide during your use of our web site will be treated within the same parameters as other personal information collected by RJMHA through other means. It is always your choice to provide information in certain fields although failure to complete certain sections may inhibit your ability to fully access all areas of our web site. Our web site also collects non-identifiable information about users such as the users IP address, the sections of the web site visited and the information downloaded. RJMHA may use this non-identifiable information and disclose it to service providers, for system administration purposes and to improve the web site.

### 3. CONSENT

a) RJMHA will use the personal information for the uses specified above in this document. By consenting to provide your information to RJMHA, you are deemed to consent to our use of the information for the purposes of Hockey Programming listed in this Privacy Policy and to disclosure of the information to other associated organizations or third parties for the same purpose.

b) In addition to using personal information for Hockey Programming purposes, RJMHA may from time to time wish to use member name, address and contact information for the purposes of providing promotional opportunities, including by providing the information to third parties who RJMHA believes provide services or goods that may be of interest to you. RJMHA and any such third parties may contact you to with promotions or to provide further hockey specific communications and information updates. If you wish to opt out of this use of information, you may do so by contacting RJMHA.

c) RJMHA recognizes that hockey by its nature is a contact sport and injuries are to a certain extent inherent in the game. We believe medical records, medical history and medical forms of the individual may be of assistance in an emergency situation and therefore we may request them. While our members and prospective members are under no obligation whatsoever to supply this information and may refuse to do so without penalty, RJMHA will consider receipt of this information as consent for its subsequent use in an emergency medical situation.

d) If at any time you wish to withdraw your consent to the use of your information for any purposes, you may do so by contacting the Privacy Officer. We will do our best to accommodate your request in a timely fashion without diminishing the services we provide to you. We will explain to you the impact of your withdrawal on any services we provide to you.

e) RJMHA may collect personal information without consent where reasonable to do so and where permitted by law.

#### 4. LIMITING COLLECTION

a) All information shall be collected fairly and lawfully within the criteria as set forth in our Privacy Policy.

b) RJMHA shall not indiscriminately collect information. The amount and type of information we collect shall be limited to that which is required to fulfill our identified purposes.

c) RJMHA will not use any form of deception in gaining personal information from its members.

#### 5. LIMITING USE, DISCLOSURE AND RETENTION

a) Subject to applicable legislation, RJMHA shall limit use of personal information it collects to purposes that we have disclosed in Sections 2 (Purposes) and 3 (Consent).

b) RJMHA shall maintain documents for certain periods of time dependent upon necessity. More specifically:

We will normally maintain registration data for a three-year period after an Individual has left our programs in the event that an Individual chooses to return to our programs after leaving.

- Parental/family information will be normally maintained for a similar three-year period after a member has left our programs.
- RJMHA may from time to time enlist the services of third party vendors or service providers in order to provide hockey programs, technical and support services. Prior to enlisting the services of these firms we will contractually commit them to treat your personal information consistent with our Privacy Policy.
- RJMHA may at some point be involved in the sale, merger, transfer or reorganization of its activities. We may disclose personal information to the other party in such a transaction. RJMHA will ensure that we contractually obligate the other party to treat his information in a manner consistent with our Privacy Policy.
- RJMHA may disclose your personal information to a government authority that has asserted its lawful authority to obtain the information or where the association has reasonable grounds to believe the information could be useful in the investigation of an unlawful activity, or to comply with a subpoena or warrant or an order made by the court, person, or body with jurisdiction to compel the production of the information or otherwise as permitted by applicable law.
- RJMHA may at its discretion release personal information for the purposes of collecting debts that may be owed to RJMHA.

c) Certain documents may be subject to legislated retention periods either federally or provincially and these will be respected at all times by RJMHA

## 6. ACCURACY

a) RJMHA shall strive to ensure to the extent we can that the information entrusted to us is maintained in an accurate manner.

b) RJMHA will only update information in the event new information is provided by the Individual, by way of new registration or otherwise.

## 7. SAFEGUARDS

a) RJMHA will use its best efforts to ensure your personal information is protected from theft as well as unauthorized access, disclosure, copying, use or modification thereof.

b) Methods of protection and safeguards to be employed shall include but in no way be necessarily limited to off-site storage of information, and need to know access as well as technological measures such as passwords.

## 8. OPENNESS

a) RJMHA publicly discloses the methods by which we handle your personal information. This information is readily available through obtaining a copy of this Privacy Policy, on our web site, or upon request by contacting the RJMHA Privacy Officer.

## 9. INDIVIDUAL ACCESS

a) Subject to applicable legislation, upon request by an Individual concerned, RJMHA shall disclose whether or not it actually holds personal information on that Individual. We will disclose the source of this information when requested and provide an account of third parties to whom the information may have been disclosed.

b) RJMHA may request sufficient information to confirm an Individual's identity before releasing personal information to that Individual.

c) Subject to applicable legislation, RJMHA shall endeavor to provide this information within 10 days of receipt of the information requested and only charge nominal fees for the purpose of offsetting its expenses incurred in supplying the requested information. This information shall be provided in an understandable format at the time you make a request.

d) Any inaccurate information that is brought to our attention shall be corrected by RJMHA as quickly as possible and any pertinent third parties shall be apprised of the corrections in due course.

## 10. CHALLENGING COMPLIANCE

Any grievance in the administration of our Privacy Policy should be made in writing to the Privacy Officer. The Privacy Officer, in conjunction with the RJMHA President and/or the RJMHA board of directors will investigate all complaints. If the complaint is deemed justified RJMHA shall take the appropriate steps to ensure that compliance is achieved and will make changes to its policies to allow for compliance in the future.

## 11. CONDITIONS AND ASSUMPTIONS

This Privacy Policy is subject to the following conditions and assumptions:

- a) RJMHA is a volunteer, not-for-profit society, with limited means to continually review and monitor personal information on behalf of its members and Individuals affected by it.
- b) That all Individuals providing personal information or executing documents on behalf of themselves or on behalf of another Individual have been duly authorized to do so and that such personal information is accurate, such documents have been validly executed, contain no false information or misrepresentations.
- c) The authenticity and completeness of all original documents or information provided to us and the conformity to original documents of all certified copies, photocopies, electronically transmitted copies and facsimiles provided to us.
- d) RJMHA and its Board of Directors will use their reasonable efforts to ensure compliance with the terms of this Privacy Policy, but cannot and will not be personally liable for any breach or event of non-compliance, unless resulting from intentional disregard or negligence.