



Policy title:	Privacy Policy		
Adopted:			
Current version approved by Board of Directors:	September 7, 2017	Pages: 4	

## Definitions

The following terms have these meanings in this Policy:

- a. "CASSA" the Canadian Amateur Synchronized Swimming Association, also known as Synchro Canada or SC;
- b. "CEO" means the SC Chief Executive Officer;
- c. "Club" means an organized group of registered persons associated for competitive or recreational synchronized swimming;
- d. "Including" means including but not limited to;
- e. "Member" means any Provincial or Territorial Section registered with CASSA;
- f. "Provincial or Territorial Section" means a provincial or territorial organization that is responsible for the management of synchronized swimming within its provincial or territorial boundaries;
- g. "Registrant" means any Club or individual that has fulfilled the requirements of registration as required by CASSA and has paid any associated registration fees to CASSA. A complete list of Registrant categories can be found in the SC *Bylaws* and related SC *Registration Policy*;
- h. "SC Activity" means all SC business and activities over which SC has jurisdiction; and
- i. "SC Participants" means all persons engaged in any paid or volunteer capacity with SC or otherwise under the jurisdiction of SC.

## Application

This Policy applies to all SC Participants and any individual whose personal information is managed by SC. SC Participants include:

- All SC Members or Registrants;
- SC directors, officers, committee members and volunteers;

- SC employees and persons under contract with SC;
- All athletes eligible for selection to, or forming part of, any team participating in competitions or events over which SC has jurisdiction; and
- All persons working with those teams or athletes, including coaches, medical and paramedical personnel and other support persons.

## **Purpose**

SC is committed to keeping your personal information confidential and secure, and has developed this Privacy Policy as part of this commitment. Please take the time to familiarize yourself with this Privacy Policy as it sets out what type of information is collected, how this information is used, and with whom the information is shared. SC also recommends that you review this document periodically as it may be altered or updated from time to time.

SC has taken a policy decision to align its privacy program with the ten privacy principles set out in the Canadian Standards Association (CSA) Model Code for the Protection of Personal Information.<sup>1</sup>

## **Personal Information**

Personal information will only be collected by SC to achieve the highest standard of organizing and programming the sport of synchronized swimming.

SC may collect personal information from you and about you such as:

- CASSA number;
- Name and contact information, including telephone number, residential address and e-mail address;
- Emergency contact information;
- Athlete information and history, including date of birth, gender, citizenship, competitor levels, physical evaluation, feedback from coaches, and scores and competition results;
- Athlete medical information including medical, psychological and nutritional evaluations, past medical history and health insurance plan number;
- Passport number;
- Credit card number or other banking information;
- Photographs, video footage and recorded comments;
- Employee, coach, official and volunteer information including name and contact information, Social Insurance Number, banking information, coach eligibility information such as National Coaching

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<sup>1</sup> SC is also governed by the *Personal Information Protection and Electronic Documents Act* in matters involving the collection, use and disclosure of personal information during commercial activities, such as when advertising space is sold in event programs.

Certification Program (“NCCP”) number and level, official eligibility information such as judge or referee level, and resume information including experience and qualifications; and

- Police records check, vulnerable sector screening and personal reference information, as required, for coaches, officials, volunteers and board members.

## **Use and disclosure**

SC may use your personal information for purposes including:

- To communicate SC programs, events and activities;
- To provide you with news, event information and opportunities from SC;
- To register Members and Registrants and to collect any fees associated with registration;
- To communicate within and between SC Participants;
- For record-keeping including posting results;
- To determine eligibility and qualifications of coaches;
- To determine eligibility and qualifications of officials;
- To determine athlete eligibility, age category and appropriate level of competition;
- For use in the case of medical emergencies;
- For the safety of athletes and to identify adverse trends or specific issues that require remedial action;
- To ensure insurance compliance;
- To process registration fees and for other payment-related purposes such as registration at workshops, travel administration and to purchase equipment or uniforms;
- To process sponsorships and to engage in sponsor recognition activities;
- To report to sponsors, partners, funders and donors;
- For training, educational and promotional purposes;
- To process payroll, source deductions, insurance and other benefits for employees, athletes, coaches, officials and other SC Participants; and
- For internal purposes, including administration and to comply with legal and regulatory requirements.

SC may disclose your personal information, to the extent necessary, to SC Participants including officials, referees, meet managers and scorers, the Coaching Association of Canada and other organizations, volunteers and programmers who require it to allow administration and continued safe participation within the sport. SC may also disclose your personal information to these organizations and individuals to allow communication with and between athletes, coaches, officials, board members and other SC Participants, and for the promotion of the sport more generally.

SC may use third party service providers to process or handle personal information on its behalf and to assist with various services such as event photography, printing, marketing and technology support. SC does not use sell, rent, trade or otherwise disclose any of your personal information to any third parties, except as described in this Privacy Policy or as permitted or required by law.

## **Consent**

You may give express consent in writing, orally or electronically. You can also imply consent through action or inaction. For example:

- By completing and signing a registration form or other SC materials;
- Orally, when personal information is provided in person or over the telephone;
- Electronically, when personal information is provided over by e-mail or through social media sites such as Facebook and Twitter; or
- By voluntarily disclosing personal information to a SC Participant.

Before deciding what form of consent is appropriate, SC will consider the type of personal information it needs, the reason for its use, as well as the individual's reasonable expectations. SC will generally seek express consent when the information is likely to be considered sensitive.

You may also give consent through an authorized representative, such as a parent or legal guardian. This is necessary, for example, in the case of athletes who are minors. For athletes aged 13, 14 and 15, consent will typically be obtained from the teenager, however a parent or legal guardian will also be asked to provide consent prior to the use or disclosure of any sensitive personal information.

## **Safeguards**

SC takes steps to ensure that coaches, volunteers, employees, board and Committee members and other SC Participants are aware of the importance of maintaining the security and confidentiality of any personal information in SC's control. Reasonable physical and procedural safeguards have been put in place designed to protect this information.

## **Your Choices**

You may access and update your personal information at any time. You may also tell SC at any time to stop using information about you by contacting the CEO (subject to legal and contractual restrictions and reasonable notice). SC will comply with your request as quickly as possible but there may be certain uses of personal information that SC may not be able to stop immediately.

## **How to Reach Us**

The CEO is accountable for SC's compliance with this Privacy Policy. If you have a general question about this Privacy Policy or would like to update your personal information or preferences, please contact the CEO.