

# **VOLLEYBALL ALBERTA - WEB PRIVACY POLICY**

## **Purpose of this Policy**

1. Privacy of personal information is governed by the *Personal Information Protection and Electronics Documents Act* (“PIPEDA”). This policy describes the way that Volleyball Alberta collects, uses, retains, safeguards, discloses and disposes of personal information, and states Volleyball Alberta’s commitment to collecting, using and disclosing personal information responsibly. This policy is based on the standards required by PIPEDA, and Volleyball Alberta’s interpretation of these responsibilities.

## **Background**

2. Our organization, Volleyball Alberta, is the governing body for the sport of Volleyball in Alberta, and provides these services to members and the public:
  - a) Arrange and organize volleyball competitions;
  - b) Regulation and officiating of the sport of volleyball;
  - c) Development and accreditation of coaches;
  - d) Support and development of individual athletes and teams;
  - e) Fair and equal access to participate in competition, coaching and officiating;
  - f) Provide leadership opportunities for athletes to develop and grow;
  - g) Seeks affiliation with other organizations with a view to the promotion of the game of volleyball; and
  - h) Encourages and promotes proficiency and excellence by Canadians in all aspects of the game of volleyball.

## **Personal Information**

3. Personal information is 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 business information (e.g., an individual’s business address and telephone number), which is not protected by privacy legislation.

## **Accountability**

4. Terry Gagnon is the Privacy Officer and is responsible for the monitoring of 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 may be contacted at the following address:

Volleyball Alberta  
Bay #6, 135 Commercial Drive  
Calgary, AB. T3Z 2A7  
Tel. (587) 273-1513  
tgagnon@volleyballalberta.ca

## **Purpose**

5. Personal information will only be collected by Volleyball Alberta to meet and maintain the highest standard of organizing and programming the sport of volleyball. Volleyball Alberta collects personal information from prospective members, coaches, referees, participants, managers and volunteers for purposes that include, but are not limited to, the following:
  - a) Name, address, phone number, cell phone number, fax number and e-mail address for the purpose of receiving information from Volleyball Alberta.
  - b) NCCP number, education, resumes and experience for database entry at the Coaching Association of Canada to determine level of certification and coaching qualifications.
  - c) Credit card information for registration at events, clinics, camps, conferences, and for purchasing equipment, coaching manuals and other resources.
  - d) Date of birth and athlete biography for media releases and to determine age group.
  - e) Banking information, social insurance number, criminal records check, resume, and beneficiaries for Volleyball Alberta's payroll, company insurance and health plan.
  - f) Personal health information including provincial health card numbers, allergies, emergency contact and past medical history for use in the case of medical emergency.
  - g) Athlete information including height, uniform size, shoe size, feedback from coaches and trainers, performance results, biography information for required registration forms, outfitting uniforms, media relations, publishing results and components of selection.
  - h) Individual measurements for adjusting equipment.
  - i) Marketing information including attitudinal and demographic data on individual members to determine membership demographic structure, and program wants and needs.
  - j) Individuals providing their addresses or e-mail addresses to Volleyball Alberta will receive email notices regarding programs and events and may receive advertisements from Volleyball Alberta sponsors.
6. If a purpose has not been identified herein, Volleyball Alberta will seek consent from individuals when personal information is used for a purpose not already consented to. This consent will be documented as to when and how it was received.

## **Consent**

7. Consent is required to be obtained by lawful means from individuals at the time of collection, prior to the use or disclosure of the personal information. If the consent to the collection, use or disclosure was not obtained upon receipt of the information, consent will be obtained prior to the use or disclosure of that information. Volleyball Alberta may collect personal information without consent where reasonable to do so and where permitted by law.
8. By providing personal information to Volleyball Alberta, individuals are consenting to the use of the information for the purposes identified in this policy.
9. In determining the form of consent to use, Volleyball Alberta will consider the sensitivity of the information.
10. Volleyball Alberta will not, as a condition of a product or service, require an individual to consent to the collection, use or disclosure of information beyond that required to fulfill the specified purpose.
11. An individual may withdraw consent to the collection, use or disclosure of personal information at any time, subject to legal or contractual restrictions, provided the individual gives one week's notice of such withdrawal to Volleyball Alberta. The Privacy Officer will advise the individual of the implications of such withdrawal.

## **Limiting Collection**

12. All personal information will be collected fairly, by lawful means and for the purposes as specified in this policy. Volleyball Alberta will not use any form of deception to obtain personal information.

## **Limiting Use, Disclosure and Retention**

13. Personal information will not be used or disclosed by Volleyball Alberta for purposes other than those for which it was collected as described herein, except with the consent of the individual or as required by law.
14. Information disclosed to a third party with consent from the individual will be protected by a third-party agreement to limit use and disclosure.
15. Personal information will be retained for certain periods of time in accordance with the following:
  - a) Registration data and athlete information will be retained for a period of three years after an individual has left the program in the event that the individual chooses to return to the program;
  - b) Parental/family information will be retained for a period of three years after an individual has left the program in the event that the individual chooses to return to the program;
  - c) Credit Card information will be destroyed immediately upon completion of a financial transaction.
  - d) Information collected by coaches will be retained for a period of three years after an individual has left the program in the event that the individual chooses to return to the program, and in order to communicate program and conference dates;
  - e) Employee information will be retained for a period of seven years in accordance with Canada Customs and Revenue Agency requirements;
  - f) Personal health information will be immediately destroyed in the event that the individual chooses to leave the program;
  - g) Marketing information will be immediately destroyed upon compilation and analysis of collected information.
  - h) As otherwise may be stipulated in federal or provincial legislation.
16. 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.
17. Volleyball Alberta may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where Volleyball Alberta 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 or otherwise as permitted by applicable law.
18. Documents will be destroyed by way of shredding and electronic files will be deleted in their entirety. When hardware is discarded, Volleyball Alberta will ensure that the hard drive is physically destroyed.

## **Accuracy**

19. Volleyball Alberta will use accurate and up-to-date information 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 an individual.

## **Safeguards**

20. Personal information is protected by security safeguards appropriate to the sensitivity of the information against loss or theft, unauthorized access, disclosure, copying, use or modification.
21. Methods of protection and safeguards include, but are not limited to, locked filing cabinets, restricted access to offices, security clearances, need-to-know access and technological measures including the use of passwords, encryption and firewalls.
22. 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 are 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 Volleyball Alberta with appropriate privacy assurances.

## **Openness**

23. Volleyball Alberta will publicize information about its policies and practices relating to the management of personal information. This information is available through this policy, on Volleyball Alberta's web site or upon request by contacting the Privacy Officer, Terry Gagnon at [tgagnon@volleyballalberta.ca](mailto:tgagnon@volleyballalberta.ca) or by phone at (587) 273-1513.
24. The information available to the public includes:
  - a) The name or title, address and telephone number of Volleyball Alberta's Privacy Officer.
  - b) The forms that may be used to access personal information or change information.
  - c) A description of the type of personal information held by Volleyball Alberta, including a general statement of its approved uses.

## **Individual Access**

25. Upon written request, and with assistance from Volleyball 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. 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.

26. Requested information will be disclosed to the individual within 30 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.
27. If personal information is inaccurate or incomplete, it will be amended as required.
28. 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.
29. Upon refusal, Volleyball Alberta will inform the individual the reasons for the refusal and the associated provisions of PIPEDA.

### **Challenging Compliance**

30. An individual may challenge Volleyball Alberta's compliance with this policy and PIPEDA, by submitting a challenge in writing.
31. Upon receipt of a written complaint, Volleyball Alberta will:
  - a) Record the date the complaint is received;
  - b) Notify the Privacy Officer who will serve in a neutral, unbiased capacity to resolve the complaint;
  - c) Acknowledge receipt of the complaint by way of telephone conversation and clarify the nature of the complaint within three days of receipt of the complaint;
  - d) Appoint an investigator using Volleyball Alberta personnel or an independent investigator, who will have the skills necessary to conduct a fair and impartial investigation, and who will have unfettered access to all files and personnel, within ten days of receipt of the complaint.
  - e) Upon completion of the investigation and within 25 days of receipt of the complaint, the investigator will submit a written report to Volleyball Alberta.
  - f) Notify the complainant of the outcome of the investigation and any relevant steps taken to rectify the complaint, including any amendments to policies and procedures, within 30 days of receipt of the complaint.
32. An individual may appeal a decision made by Volleyball Alberta under this Policy, in accordance with Volleyball Alberta's policies for appeals.

### **IP Address**

When the user's web browser requests a web page from another computer on the Internet, it automatically gives that computer the address where it should send the information. This address is called the computer's "IP address."

Volleyball Alberta does not collect, use or disclose IP Addresses.

### **Cookies**

Cookies are small text files that a Web browser transfers to and from your hard drive for record keeping purposes. Cookies make life easier for you by saving your passwords, purchases, and preferences while you're at our site. The use of cookies is an Internet standard, and you'll find cookies at most major Web sites.

The use of cookies is an industry standard and many major browsers are initially set up to accept them. You can reset your browser to either refuse to accept all cookies or to notify you when you have received a cookie. However, if you refuse to accept cookies, you may not be able to use some of the features available on websites.

Volleyball Alberta does not use cookies to identify specific individuals.

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### **Applicable Law**

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