

Privacy Policy

General

1. Purpose – The purpose of this policy is to govern the collection, use and disclosure of Personal Information in a manner that recognizes the right of an Individual to have his or her Personal Information protected and the need of Volleyball Alberta to collect, use or disclose Personal Information for purposes that are reasonable. This policy is based on the standards required by the Act, and Volleyball Alberta's interpretation of these responsibilities.
2. Definitions – The following terms have these meanings in this Policy:
 - (a) *"Act"* – *Personal Information Protection Act* (Alberta)
 - (b) *"Business Contact Information"* – means an Individual's name, position name or title, business telephone number, business address, business e-mail address, business fax number and other similar business information.
 - (c) *"Individual"* – means a prospective registrant, registrant, athlete, participant, coach, referee, manager, volunteer, director, officer, employee, committee member, contractor of Volleyball Alberta and other decision-maker with Volleyball Alberta.
 - (d) *"Personal Health Information"* – any health information about an identifiable Individual.
 - (e) *"Personal Information"* – any information about an identifiable individual. Personal information includes information that relates to their personal characteristics (e.g., gender, sex at birth, age, income, e-mail, 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 an individual's Business Contact Information if the collection, use or disclosure, as the case may be, is for the purposes of enabling the individual to be contacted in relation to the individual's business responsibilities and for no other purpose.
 - (f) *"Privacy Officer"* – has the meaning given in Section 6.
 - (g) *"Representatives"* - Directors, officers, employees, committees, registrants, volunteers, coaches, contractors and other decision makers within Volleyball Alberta.
 - (h) *"Service Provider"* – means a parent corporation, subsidiary, affiliate, contractor or subcontractor, that, directly or indirectly, provides a service for or on behalf of Volleyball Alberta.
 - (i) *"Website"* – means www.volleyballalberta.ca
3. Application – This Policy applies to all Individuals.

4. Statutory Obligations – Volleyball Alberta is governed by the Act in matters involving the collection, use and disclosure of Personal Information.
5. Ruling on Policy – Except as provided in the Act, the Board of Directors (or approved designate) of Volleyball Alberta will have the authority to interpret any provision of this Policy that is contradictory, ambiguous, or unclear.

Accountability

6. Privacy Officer – Volleyball Alberta will designate an individual to oversee the implementation and monitoring of this Policy and the security of Personal Information (“**Privacy Officer**”).
7. Duties – The Privacy Officer will:
 - (a) Monitor Personal Information collection and data security;
 - (b) Implement procedures to protect Personal Information;
 - (c) Establish procedures to receive and respond to complaints and inquiries;
 - (d) Train staff and communicate to staff information about Volleyball Alberta’s policies and practices; and
 - (e) Develop information to explain Volleyball Alberta’s policies and procedures to members, registrants and the public.
8. Staff Training – The Privacy Officer will ensure all staff implement the proper procedures to protect Personal Information.
9. Identity – The identity of the Privacy Officer will be made known via Volleyball Alberta’s website and will be publicly accessible.
10. Inquiries – The Privacy Officer will be responsible to respond to all requests and inquiries in regard to Personal Information.
11. Principles – Volleyball Alberta will implement policies and practices to secure all Personal Information during collection, use and disclosure.
12. Information – Information will be made available to the public via Volleyball Alberta’s website explaining privacy policies and procedures.
13. Annual Review – This Policy will be reviewed annually by the Privacy Officer and necessary changes will be made to ensure the protection of Personal Information and compliance with the law.

Collection, Use and Disclosure of Personal Information

14. Collection of Personal Information – Volleyball Alberta may collect a variety of Personal Information from Individuals reasonably necessary for the identified purposes set out in Section 16. Some of the Personal Information that Volleyball Alberta may collect is as follows:
- (a) Individual information such as height, uniform size, shoe size, feedback from coaches, trainers mentors and evaluators, and performance results.
 - (b) Benefit information such as banking information, social insurance number, criminal records check, resume, and beneficiaries.
 - (c) Biographic information such as name, address, date of birth, gender at birth, contact information, including telephone number and email.
 - (d) Experience information such as education, training, screening information and professional background.
 - (e) Financial information such as payment information, banking information, and social insurance number.
 - (f) Personal Health Information such as provincial health card numbers, allergies, emergency contact, insurance and past medical history.
 - (g) Marketing information such as attitudinal and demographic data on Individuals.
 - (h) Video recordings (such as streams of live or recorded events) and photographs of Individuals.
15. How Personal Information is Collected – Except as listed in Section 26, Volleyball Alberta will collect Personal Information directly from the individual in the course of their involvement with Volleyball Alberta.
16. Use of Personal Information – Personal Information will only be used by Volleyball Alberta to meet and maintain the standard of organizing and programming the sport of volleyball. Personal Information may be used by Representatives or Service Providers for reasonable purposes that include, but are not limited to, the following:
- (a) Biographic information for the purpose of receiving information from Volleyball Alberta.
 - (b) Experience information for database entry to determine level of certification and coaching qualifications.
 - (c) Financial information for registration at events, conferences, clinics, camps and for purchasing equipment, coaching manuals and other resources.

- (d) Biographic information and Experience information for media releases and to determine age group.
 - (e) Benefit information for Volleyball Alberta's payment systems, company insurance and health plan.
 - (f) Health information for use in the case of medical emergency.
 - (g) Individual information for required registration forms, outfitting uniforms, adjusting equipment, media relations, publishing results and components of selection.
 - (h) Marketing information to determine membership demographic structure, and program wants and needs.
 - (i) Biographic information for the purpose of receiving email notices regarding programs and events and receiving advertisements from Volleyball Alberta partners and sponsors.
 - (j) Video recordings and photographs for the purposes of streaming or recording events and for general marketing purposes.
17. Identify – Volleyball Alberta will identify, in writing or orally, the purposes for which Personal Information is collected at or before the time of collection. The purposes will be stated in a manner that an Individual can reasonably understand how the information will be used or disclosed.
18. Purposes Not Identified – Volleyball Alberta will seek consent from Individuals when Personal Information is used for a purpose not previously identified. This consent will be documented as to when and how it was received.
19. Disclosure of Personal Information – Personal Information may be disclosed by Volleyball Alberta Representatives for reasonable purposes that include, but are not limited to, the following:
- (a) Activity or event organizers including Volleyball Alberta, Volleyball Canada or another provincial/territorial association for the purposes of activities or events regulated or organized by them;
 - (b) Sponsors of Volleyball Alberta for the purposes of advertising;
 - (c) Service Providers including but not limited to payment services, IT services, insurers, complaint managers, consultants, accountants, legal advisors, financial institutions, tax institutions or government institutions;
 - (d) Employees, officers, and directors of Volleyball Alberta who have a need to know such information;
 - (e) To comply with legal requirements when permitted or required by law.

Consent

20. Consent – Except for as listed in Sections 27 and 28, Volleyball Alberta will obtain consent from Individuals at the time of collection prior to the use or disclosure of Personal Information (including, for greater certainty, when Personal Information is transferred to a Service Provider). If consent of the collection, use or disclosure was not obtained upon receipt of the information, consent will be obtained prior to the use or disclosure of the Personal Information. By providing Personal Information to Volleyball Alberta, Individuals are consenting to the use of the information for the specific purposes identified in this policy.
21. Lawful Means – All Personal Information will be collected fairly, by lawful means and for the purposes as specified in this policy. Consent will not be obtained by deception.
22. No Requirement – 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.
23. Form of Consent – Consent may be written, oral or implied. In determining the form of consent to use, Volleyball Alberta will consider the sensitivity of the information, as well as the Individual's reasonable expectations. Individuals may consent to the collection and specified uses of Personal Information in the following ways:
- (a) By signing an application form;
 - (b) By checking a check off box;
 - (c) By providing written consent either physically or electronically;
 - (d) By consenting orally in person; or
 - (e) By consenting orally over the phone or video conference.
24. Withdrawal – An Individual may withdraw consent to the use or disclosure of Personal Information at any time, subject to legal or contractual restrictions, provided the Individual gives two week's notice of such withdrawal. Volleyball Alberta will inform the Individual of the implications of such withdrawal.
25. 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.
26. Exceptions for Collection – Volleyball Alberta may collect Personal Information without the Individual's knowledge or consent if:
- (a) the collection is clearly in the Individual's interests and consent is not available in a timely way;
 - (b) the collection of information is authorized or required by law;

- (c) the collection is required for an audit or inspection where the audit or inspection is authorized or required by law;
- (d) the collection is reasonable for the purposes of an investigation or a legal proceeding;
- (e) the collection of the information is necessary to determine the Individual's suitability to receive an honour, award or similar benefit;
- (f) the collection of the information is necessary in order to collect a debt owed to Volleyball Alberta;
- (g) the information is collected solely for the purposes of establishing, managing and terminating an employment or volunteer relationship between Volleyball Alberta and the Individual;
- (h) the information is for journalistic, artistic or literary purposes;
- (i) the information is publicly available as specified in the Act;
- (j) the information is for archival or research purposes as specified in the Act; or
- (k) the collection is otherwise authorized in the Act or by law.

27. Exceptions for Use - Volleyball Alberta may use Personal Information without the Individual's knowledge or consent if:

- (a) the use is clearly in the Individual's interests and consent is not available in a timely way;
- (b) the use of information is authorized or required by law;
- (c) the use is required for an audit or inspection where the audit or inspection is authorized or required by law;
- (d) the use is reasonable for the purposes of an investigation or a legal proceeding;
- (e) the use of the information is necessary to determine the Individual's suitability to receive an honour, award or similar benefit;
- (f) for an emergency that threatens the life, health or security of the Individual or the public;
- (g) the use of the information is necessary in order to collect a debt owed to Volleyball Alberta;
- (h) the information is used solely for the purposes of establishing, managing and terminating an employment or volunteer relationship between Volleyball Alberta and the Individual;
- (i) the information is publicly available as specified in the Act;
- (j) the information is for archival or research purposes as specified in the Act; or
- (k) the use is otherwise authorized in the Act or by law.

28. Exceptions for Disclosure – Volleyball Alberta may disclose Personal Information without the Individual's knowledge or consent if:

- (a) the disclosure is clearly in the Individual's interests and consent is not available in a timely way;
- (b) the disclosure of information is authorized or required by law;
- (c) the disclosure is required for an audit or inspection where the audit or inspection is authorized or required by law;
- (d) the disclosure of the information is for the purpose of complying with a subpoena, warrant or order issued or made by a court, person or body having jurisdiction to compel the production of information or with a rule of court that relates to the production of information;
- (e) a governmental authority has asserted its lawful authority to obtain the information or whether Volleyball Alberta has reasonable grounds to believe the information could be useful in the investigation of an unlawful activity;
- (f) the disclosure of the information is to a public body or a law enforcement agency in Canada to assist in an investigation;
- (g) for an emergency that threatens the life, health or security of the Individual or the public;
- (h) the disclosure of the information is for the purposes of contacting the next of kin or a friend of an injured, ill or deceased Individual;
- (i) the disclosure of the information is necessary in order to collect a debt owed to Volleyball Alberta;
- (j) the disclosure of the information is to the surviving spouse or adult interdependent partner or to a relative of a deceased Individual if, in the opinion of the Volleyball Alberta, the disclosure is reasonable;
- (k) the disclosure of the information is necessary to determine the Individual's suitability to receive an honour, award or similar benefit;
- (l) the disclosure is reasonable for the purposes of an investigation or a legal proceeding;
- (m) the disclosure of the information is for the purposes of protecting against, or for the prevention, detection or suppression of fraud;
- (n) the information is disclosed solely for the purposes of establishing, managing and terminating an employment or volunteer relationship between Volleyball Alberta and the Individual; or
- (o) if the information is disclosed for archival or research purposes as specified in the Act;
- (p) the information is publicly available as specified in the Act;

- (q) the disclosure is otherwise authorized in the Act or by law.

Limiting Use, Disclosure and Retention

29. Limiting Use – 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.
30. Retention Periods – Personal Information may be retained for as long as the organization reasonably requires the Personal Information for legal or business purposes. Within a reasonable period of time after Volleyball Alberta no longer reasonably requires Personal Information for legal or business purposes, Volleyball Alberta will destroy records containing the Personal Information or render the Personal Information non-identifying so that they can no longer be used to identify the Individual. Typically, Personal Information will be retained in accordance with the following:
- (a) Registration data and Individual information will be retained for a period of ten years after an Individual has left the program in the event that the Individual chooses to return to the program or for the purposes of addressing Complaints (as defined in the *Discipline and Complaints Policy – Alberta*);
 - (b) Credit card information will be destroyed immediately upon completion of a financial transaction;
 - (c) Employee information will be retained for a period of seven years in accordance with Canada Revenue Agency (CRA) requirements;
 - (d) Personal Health Information will be destroyed at the conclusion of each program;
 - (e) Marketing information will be immediately destroyed upon compilation and analysis of collected information; and
 - (f) As otherwise may be stipulated by law.
31. Process of Document Destruction – Pursuant to Section 30, physical documents will be destroyed by way of shredding and electronic files will be deleted within reasonable means.

Service Providers

32. Disclosure to Service Providers – Volleyball Alberta is responsible for all Personal Information under its custody or control, including information that it may transfer to a Service Provider for processing in order to provide Volleyball Alberta services and programs. Data collected may be transferred to, and/or stored at, a destination outside Canada for processing by a Service Provider contracted by Volleyball Alberta. If an Individual submits Personal Information, they also specifically consent to such transfer, storage, or processing. Volleyball Alberta will take reasonable steps to ensure data is treated securely and in accordance with the same standards of this policy.

33. Service Providers Outside of Canada – Should Volleyball Alberta transfer, store or disclose Personal Information to a Service Provider outside of Canada, the Privacy Officer will publish on Volleyball Alberta's website the following information: (1) a statement confirming that a Service Provider outside of Canada is being used; (2) the country in which the collection, use, disclosure or storage is occurring or may occur; and (3) the purposes for which the Service Provider outside of Canada has been authorized to collect, use or disclose such Personal Information for or on behalf of Volleyball Alberta.
34. Retention – In accordance with Section 30, if Volleyball Alberta no longer reasonably requires Personal Information for legal or business purposes, Volleyball Alberta will take reasonable steps to ensure that the Service Provider in possession of such Personal Information will similarly destroy its records containing such Personal Information.
35. Questions – The Privacy Officer is available to answer any questions that Individuals may have relating to the collection, use, disclosure or storage of Personal Information by Service Providers outside of Canada.

Accuracy

36. Accuracy – Volleyball Alberta will make reasonable efforts to ensure that Personal Information collected, used or disclosed by or on behalf of Volleyball Alberta will be accurate, complete and up to date to the reasonable extent 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.
37. Update – Personal Information will only be updated if it is necessary to fulfill the purposes for which the information was collected unless the Personal Information is used on an ongoing basis.
38. Third Parties – Volleyball Alberta will make reasonable efforts to ensure that Personal Information disclosed to a third party or Service Provider will be accurate and up to date.

Safeguards

39. 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.
40. Sensitivity – The nature of the safeguards will be directly related to the level of sensitivity of the Personal Information collected. The more sensitive the information, the higher the level of security employed.
41. Methods of Protection – 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.
42. Specific Protections – 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) Confidential 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.
43. Exception – Volleyball Alberta strives to protect Personal Information, however no method of transmitting or storing Personal Information online is completely secure. Be aware that:
- (a) there are security and privacy limitations of the Internet which are beyond Volleyball Alberta's control;
 - (b) the security, integrity and privacy of any and all information and data exchanged between an Individual and Volleyball Alberta through its website or email cannot be guaranteed; and
 - (c) any such information and data may be viewed or tampered with in transit by a third party.

Volleyball Alberta endeavors to protect Personal Information, but cannot guarantee the security of information transmitted to Volleyball Alberta, or by Volleyball Alberta, by electronic means.

Openness

44. Openness – Volleyball Alberta will publicize information about its policies and practices relating to the management of Personal Information. This information will be in a form that is generally understandable.
45. Information – The information made available will include:
- (a) the name or title, and the address, of the person who is accountable for the organization's policies 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) the means of withdrawing or varying consent of collection, use or disclosure of Personal Information;
 - (d) a description of the type of Personal Information held by the organization, including a general account of its use;

- (e) a copy of any brochures or other information that explain the organization's policies, standards, or codes; and
- (f) organizations such as the government ministry and Coaches Association of Canada to which Personal Information is made available.

Individual Access

- 46. Individual Access – Upon written request, and with assistance from Volleyball Alberta, an Individual may request that Volleyball Alberta provide the Individual with access to Personal Information about the Individual or provide the Individual with information about the use or disclosure of Personal Information about the Individual.
- 47. Amendment – An Individual will be able to challenge the accuracy and completeness of the Personal Information and have it amended as appropriate. Volleyball Alberta can make the determination not to make a correction, but must annotate the Personal Information under its control with the correction that was requested but not made.
- 48. Denial – An Individual may be denied access to his or her Personal Information and provided a written explanation as to why if:
 - (a) the 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 reasons, and
 - (d) the information is subject to solicitor-client or litigation privilege.
- 49. Contents of Refusal - If Volleyball Alberta determines that the disclosure of Personal Information should be refused, Volleyball Alberta must inform an Individual the following:
 - (a) the reasons for the refusal and the provisions of the Act on which the refusal is based;
 - (b) the name, position title, business address and business telephone number of the Privacy Officer who can answer the applicant's questions; and
 - (c) that the Individual may ask for a review within thirty (30) days of being notified of the refusal.
- 50. Source – Upon request, the source of Personal Information will be disclosed along with an account of third parties to whom the information may have been disclosed.
- 51. Identity – Sufficient information may be required to confirm an Individual's identity prior to providing that Individual an account of the existence, use, and disclosure of Personal Information.

52. Response – Requested information will be disclosed within 45 days of receipt of the request at minimal expense for copying or no cost to the Individual, unless there are reasonable grounds to extend the time limit. The requested information will be provided in a form that is generally understandable.
53. Costs – Costs may only be levied if an Individual is informed in writing in advance of the approximate cost and has agreed to proceed with the request.
54. Inaccuracies – If Personal Information is inaccurate or incomplete, it will be amended as required and the amended information will be transmitted to third parties in due course.
55. Unresolved Complaints – An unresolved complaint from an Individual in regard to the accuracy of Personal Information will be recorded and transmitted to third parties or Service Providers having access to the information in question.

Challenging Compliance

56. Challenges – An Individual will be able to challenge compliance with this Policy and the Act by submitting a challenge in writing to the designated Individual accountable for compliance.
57. Procedures – Upon receipt of a 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 writing and/or a conversation and clarify the nature of the complaint within three (3) 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 will have unfettered access to all files and personnel, within ten (10) days of receipt of the complaint.
 - (e) Upon completion of the investigation and within twenty-five (25) days of receipt of the complaint, the investigator will submit a written report to Volleyball 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 within thirty (30) days of receipt of the complaint.
58. Appeal – An Individual may appeal a decision of Volleyball Alberta in accordance with its *Appeal Policy*.
59. Assistance – Volleyball Alberta will assist an Individual in preparing a request for information.
60. Whistleblowing – Volleyball Alberta must not dismiss, suspend, demote, discipline, harass or otherwise disadvantage an employee of Volleyball Alberta, or deny that employee a benefit because the employee, acting in good faith and on the basis of reasonable belief:

- (a) has disclosed to the Office of the Information and Privacy Commissioner of Alberta that Volleyball 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 these Act;
- (c) has refused to do or stated an intention of refusing to do anything that is in contravention of these Act.

Approved by the Volleyball Alberta Board of Directors [July 21, 2026].