PRIVACY & CONFIDENTIALITY POLICY

Purpose:

To ensure that all employees are informed of the expectations and parameters of applying Privacy & Confidentiality in and beyond the workplace.

People:

This policy applies to all employees, volunteers, board members, contractors and visitors to any worksite, office or other location that Pacific Sport Regional Centre – Vancouver Island is operating from.

Procedure Summary:

The following procedures outlines the Privacy & Confidentiality to ensure that they are aligned with the British Columbia's *Personal Information Protection Act* (PIPA or the "Act"). PSVI is committed to providing Clients and Stakeholders with exceptional service. Where providing this service involves the collection, use and disclosure of some personal information about Clients and Stakeholders, protecting their personal information is one of PSVI'S highest priorities.

Procedures:

- 1. All staff will inform Clients and Stakeholders of:
 - a. why and how PSVI collects, uses, and discloses their personal information,
 - b. obtain their consent where required, and;
 - c. only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.
- 2. PSVI's privacy commitment will include:
 - a. ensuring the accuracy, confidentiality, and security of Clients' and Stakeholders' personal information, and;
 - b. allowing Clients and Stakeholders to request access to, and correction of, their personal information.
 - c. such access will be granted upon a 30-day notice requesting access to review one's own personal information and an authorized staff member must be present for the duration of the review.
- 3. Information will only be collected from Clients and Stakeholders as is necessary to fulfill the following purposes:
 - a. Verify identity
 - b. Establish pertinent baseline performance data to assist coaching decisions in a provincial team competitive or training setting
 - c. Report non-identifying, demographic and participation statistics to funders, sponsors and other authorized third parties
 - d. Make direct contact with registrants, volunteers, and staff as necessary for the operation of PSVI
 - e. Determine if a Stakeholder ability to pass a Criminal Record Check for the purposes of working with Vulnerable Adults and Children
 - f. Confirm employment and personal information for recruiting for employment and volunteer positions
 - g. financial information for enrolment and registration collections

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- 4. PSVI will obtain consent from Clients and Stakeholders to collect, use or disclose personal information (except where, as noted below, PSVI is authorized to do so without consent).
 - a. Consent can be provided electronically, or;
 - b. it can be implied when it is considered obvious that the Client or Stakeholder voluntarily provides personal information for that purpose.
 - c. Consent may also be implied where a Client or Stakeholder is given notice and a reasonable opportunity to opt-out of PSVI using their personal information, and does not do so.
- 5. A Client's or Stakeholder's decision to withhold or withdraw their consent to certain uses of personal information may restrict PSVI's ability to provide a particular service. If so, PSVI will explain the situation to assist the Client or Stakeholder in making the decision.
- 6. PSVI may collect, use or disclose personal information without the consent of the Client or Stakeholder in the following limited circumstances or as laid out in Sections 12, 15 and 18 of the Act:
 - a. When the collection, use or disclosure of personal information is permitted or required by law,
 - b. In an emergency that threatens an individual's life, health, or personal security,
 - c. When the personal information is available from a public source (e.g., a telephone directory),
 - d. When PSVI requires legal advice from a lawyer,
 - e. For the purposes of collecting a debt,
 - f. To protect ourselves from fraud,
 - g. To investigate an anticipated breach of an agreement or a contravention of law
- 7. PSVI may use or disclose personal information where personal information collected from or on behalf of another organization without the consent of the individual to whom the information relates, if
 - a. the individual consented to the use of the personal information by the other organization, and;
 - b. the personal information is used by PSVI solely for the purposes for which the information was previously collected, and to assist that organization to carry out work on behalf of the other organization.
- 8. PSVI will only use or disclose personal information where necessary to fulfill the purposes identified at the of collection or within this Policy.
- 9. PSVI will not use or disclose personal information:
 - a. for any additional purpose unless PSVI obtains consent to do so,
 - b. sell Client lists or personal information to other parties
- 10. If member's personal information is used to make a decision that directly affects the member, PSVI will retain that personal information for at least one year, to provide the member reasonable opportunity to request access to it. Otherwise, personal information will be kept as long as necessary to fulfill the identified purposes or a legal or business purpose.
- 11. The following security measures will be followed to ensure that personal information is appropriately protected, by:
 - a. physically securing offices where personal information is held,
 - b. the use of user IDs, passwords, encryption, firewalls,
 - c. restricting employee access to personal information as appropriate
 - d. destroying member's personal information such as shredding documents and deleting electronically stored information.

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STAKEHOLDER CONSENT FORM For Use Of PRIVATE AND CONFIDENTIAL PERSONAL INFORMATION

- 1. I ______, (insert name) authorize PSVI to collect and use personal information about me for the purposes described in the *Privacy Policy*.
- 2. In addition to the purposes described in the *Privacy Policy*, I authorize PacificSport Regional Centre Vancouver Island (PSVI) to:
 - a) Distribute my information between PSVI and ______ (insert the name of the club or other organizations)
 - b) Photograph and/or record my image and/or voice and use this material to promote the sport through social media and traditional media such as newsletters, websites, television, film, radio, print and/or display form. I understand that I waive any claim to remuneration for use of audio/visual materials used for these purposes
 - c) Other: _____
- 3. I understand that I may withdraw such consent at any time by contacting the Privacy Officer. The Privacy Officer will advise the implications of such withdrawal.

My signature below indicates that I am authorising PacificSport Regional Centre – Vancouver Island to collect, use, store and dispose of my personal information as set out in their Privacy & Confidentiality Policy. I further acknowledge that I have read and understand the PSVI Privacy & Confidentiality Policy.

Signature

Date

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