



Synchro Swim Ontario Privacy Policy

Purpose of this Policy

1. Privacy of personal information is governed by the Personal Information Protection and Electronic Documents Act ("PIPEDA"). This policy describes the way that Synchro Swim Ontario collects, uses, retains, safeguards, discloses and disposes of personal information, and states Synchro Swim Ontario's commitment to collecting, using and disclosing personal information responsibly. This policy is based on the standards required by PIPEDA, and Synchro Swim Ontario's interpretation of these responsibilities.

Background

2. Our organization, Synchro Swim Ontario, is the governing body for the sport of synchronized swimming in Ontario, and provides these services to members and the public:
"Synchro Swim Ontario is the sport body that oversees synchronized swimming in Ontario. This includes varsity competition, competitive clubs, community programs, recreational clubs and programs, and scholastic programs. Our mission is to develop, promote, support and regulate synchronized swimming through the implementation of an integrated sports system that is accessible to all Ontarians by providing opportunities for enjoyment and the pursuit of individual goals."

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. Leslie Makins is the Privacy Officer and is responsible for the monitoring information collection and data security, and ensuring that all staff receive 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:

Synchro Swim Ontario
1185 Eglinton Ave. East, Suite 303
Toronto, ON M3C 3C6

Purpose

5. Personal information will only be collected by Synchro Swim Ontario to meet and maintain the highest standard of organizing and programming the sport of synchronized swimming. Synchro Swim Ontario 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 communicating about Synchro Swim Ontario's programs, events and activities.

- b. Name, address, phone number, cell phone number, fax number and e-mail address for the purpose of emergency contacts.
- c. NCCP number, education, resumes and experience for database entry at the Coaching Association of Canada and to determine level of certification and coaching qualifications.
- d. General member numbers, CASSA numbers, NCCP numbers, résumés, length of service/participation, history, details of performance, certifications, awards won, details of participation, background, and bio information for the purpose of award nominations, bio's or published articles.
- e. Credit card or chequing information for registration at workshops, courses, conferences, membership/athlete/club registrations, travel administration and purchasing equipment, coaching manuals and other products, payment, services and resources.
- f. Date of birth, athlete history, Star/Superstar/Trillium levels, Birth Certificate, citizenship, CASSA number, and member club to determine eligibility, age group and appropriate level of play/competition.
- g. Club name, age, participant/coach name, NCCP number, general member number, team listing, events, Star/Tier levels, etc for the ability to compete in events.
- h. Banking information, social insurance number, criminal records check, resume and beneficiaries for Synchro Swim Ontario's payroll, company insurance and health plan.
- i. Criminal records check and related personal reference information for the purpose of implementing Synchro Swim Ontario's volunteer screening program.
- j. Personal health information including provincial health card numbers, allergies, emergency contact, Doctors notes and past medical history for use in the case of medical emergency, byes or reports relating to medical or emergency issues or their reporting.
- k. Athlete information including height, weight, uniform size, shoe size, feedback from coaches and trainers, performance results for athlete registration forms, outfitting uniforms, media relations and various components of athlete and team selection.
- l. Athlete whereabouts information including sport/discipline, training times and venues, training camp dates and locations, travel plans, competition schedule and disability, if applicable, for Canadian Centre for Ethics in sport inquiries for the purposes of out-of-country drug testing.
- m. Body weight, mass and body fat index to monitor physical response to training and to maintain an appropriate weight for competition.
- n. Marketing information including attitudinal and demographic data on individual members to determine membership demographic structure, and program wants and needs.
- o. Passport numbers and Aeroplan/frequent flyer numbers for the purposes of arranging travel.
- p. Name address, phone number, cell phone number, fax number and e-mail address for the purpose of providing insurance coverage, managing insurance claims and conducting insurance investigations.
- q. Club contact person information such as club name, web address, name, phone number and email address for the purpose of relaying and collecting information. Further, this information is used to direct the public to such club and provide easy access for club-to-club communication.
- r. Video footage at competitions for the purpose of technical monitoring, coach/club review, officials training, educational purposes, and sport promotion. In some cases, videos from an event will be available for purchase.
- s. Photos for the purpose of educational training, reporting and marketing of the sport in newsletters, on website, on displays or posters.
- t. Scores and ranking of athletes, coaches and clubs for record keeping, publishing, competing and identifying athletes.
- u. Names, ages and signatures for the purpose of participant agreements, permission where medical treatment is concerned, and collection of waivers.

- v. Name and contact information for the purpose of communication within and between committees, volunteers, Board members, etc.
6. If a purpose has not been identified herein, Synchro swim Ontario will seek consent from the 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. Synchro Swim Ontario may collect personal information without consent where reasonable to do so and where permitted by law.
8. By providing personal information to Synchro Swim Ontario, individuals are consenting to the use of the information for the purposes identified in this policy.
9. The determining the form of consent to use, Synchro Swim Ontario will take into account the sensitivity of the information.
10. Synchro Swim Ontario 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 of notice of such withdrawal to Synchro Swim Ontario. 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. Synchro Swim Ontario 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 Synchro Swim Ontario 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 may be forwarded to volunteers in the association (such as Meet Managers, Scorers, Referees, Officials, Meet volunteers, committee members, Board of Directors, Coaches, session leaders, etc); other provincial associations for the purpose of clinics, competitions, etc.; Coaching Association of Canada; Synchro Canada; ClubLink (database); Coaches Association of Ontario; Award Organizations; or other parties with whom the association deals.
15. Information disclosed to a third party with consent from the individual shall be protected by a third party agreement to limit use and disclosure.
16. Personal information will be retained for certain periods of time in accordance with the following:
 - a. Registration data and athlete information will be retained indefinitely for the sake of historical record and/or in the event that a swimmer requires former numbers if returning to the program;
 - b. Parental/family information will be retained for a period of three years after an individual has left a program of Synchro Swim Ontario, in the event that the individual chooses to return to the program;
 - c. Registration data and coach information will be retained indefinitely for the sake of historical record and/or in the event that a swimmer requires former numbers if returning to the sport.
 - d. Registration data for courses, clinics, workshops, etc. may be retained indefinitely after the event for records purposes.
 - 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 when an individual chooses to leave a program of Synchro Swim Ontario.

- 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.
17. 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.
 18. Synchrono Swim Ontario may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where Synchrono Swim Ontario 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.
 19. Documents will be destroyed by way of shredding and electronic files will be deleted in their entirety.

Accuracy

20. Synchrono Swim Ontario 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

21. Methods of protection and safeguards include, but are not limited to, locked filing cabinets, restricted access to offices, need-to-know access and technological measures including the use of passwords and firewalls.
22. Association volunteers, coaches, etc. who receive personal information in order to carry out the work of the organization, will be notified with regard to safekeeping of such information.
23. Whenever possible, and when appropriate, group email lists will be sent "blind copy".
24. The following steps will be taken to ensure security:
 - a. Paper information is either under supervision or secured in a locked, restricted or private area.
 - b. Electronic hardware is either under supervision or secured in a locked, restricted or private area at all times. Passwords are used on computers.
 - c. Paper information is transmitted by sealed, addressed envelopes or in boxes by reputable courier/delivery companies.
 - d. Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with this policy
 - e. External consultants and agencies with access to personal information will provide Synchrono Swim Ontario with appropriate privacy assurances.

Openness

25. Synchrono Swim Ontario will publicize information about its policies and practices relating to the management of personal information. This information is available through this policy, on Synchrono Swim Ontario's web site or by request by contacting the Privacy Officer.
26. The information available to the public includes:
 - a. The name or title, address and telephone number of Synchrono Swim Ontario's Privacy Policy.
 - 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 Synchrono Swim Ontario, including a general statement of its approved uses.

Individual Access

27. Upon written request, and with assistance from Synchrono Swim Ontario, an individual may be informed of the existence, use and disclosure of his or her personal information and will be given access to 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.

28. 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.
29. If personal information is inaccurate or incomplete, it will be amended as required.
30. 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.
31. Upon refusal, Synchro Swim Ontario will inform the individual the reasons for the refusal and the associated provision of PIPEDA.

Challenging Compliance

32. An individual may challenge Synchro Swim Ontario's compliance with this policy and PIPEDA, by submitting a challenge in writing.
33. Upon receipt of a written complaint, Synchro Swim Ontario 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 Synchro Swim Ontario personnel or an independent investigator, 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 Synchro Swim Ontario.
 - 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.
34. An individual may appeal a decision made by Synchro Swim Ontario

Approvals and Review

35. This Policy was approved by the Board of Directors of Synchro Swim Ontario on June 28, 2004 and will be reviewed annually.

IP Address

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

Synchro Swim Ontario 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.

Synchro Swim Ontario does not use cookies to identify specific individuals.

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Applicable Law

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