



Policy Title:	Privacy Policy	Policy No: SSO 1-16
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Related documents:	<i>Code of Conduct and Ethics</i> <i>Confidentiality Policy</i> <i>Discipline and Complaints Policy</i>	

Definitions

The following term has this meaning in this Policy:

“Members” - The Regional Training Centre – Ontario and any Competitive, Recreational, Scholastic, University synchronized swimming club or Trillium awards program provider

Purpose

Synchro Swim Ontario (“SSO”) 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. We also recommend that you review this document periodically as it may be altered or updated from time to time.

SSO 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.¹

Application of This Policy

This policy applies to SSO and its Members as well as all individuals employed by, or engaged in activities with, SSO including, but not limited to, any director, officer, committee member, volunteer, coach, current and prospective athlete or alumni, official, referee, manager and member within SSO or its Members.

Personal information

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

¹ SSO 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.



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

- Name and contact information, including telephone number, residential address and e-mail address;
- Emergency contact information;
- Athlete information and history, including date of birth, citizenship, Trillium and competitor levels, feedback from coaches, and scores and competition results;
- Athlete health information including Ontario Health Insurance Plan ("OHIP") number, allergies, doctor's notes and past medical history;
- Passport number;
- Credit card number or other banking information;
- Photographs, video footage and recorded comments;
- Employee, coach and volunteer information including name and contact information, Social Insurance Number, banking information, coach eligibility information such as National Coaching Certification Program ("NCCP") number and level, judge or referee level, and resume information including experience and qualifications; and
- Criminal records check and personal reference information, as required, for coaches, volunteers and board members.

Use and disclosure

We may use your personal information for the following purposes:

- To tell you about SSO programs, events and activities;
- To provide you with news, event information and opportunities from SSO and Synchro Canada;
- To communicate within and between members, volunteers including officials, board members, et al.;
- For athlete, coach, volunteer and board member registration;
- For record-keeping including posting results;
- To determine coach eligibility and coaching qualifications;
- To determine athlete eligibility, age category and appropriate level of competition;
- For the safety of our athletes and for use in the case of medical emergencies;
- 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;
- For training, educational and promotional purposes;
- To process payroll, source deductions, insurance and other benefits for our employees, athletes, coaches and volunteers; and
- For our internal purposes, including administration and to comply with legal and regulatory requirements.

We may disclose your personal information, to the extent necessary, to our members, volunteers such as meet managers, scorers, referees and officials, other provincial associations, Synchro Canada, the Coaches Association of Ontario, Coaching Association of Canada and other organizations, volunteers and programmers who require it to allow registration and continued participation within the sport. We may also disclose your personal information to these organizations to allow communication with and between athletes, coaches, board members, et al., and for the promotion of the sport more generally.



We may use third party service providers to process or handle personal information on our behalf and to assist us with various services such as event photography, printing and marketing. We do 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 SSO 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 member, coach, volunteer, employee or board member.

Before deciding what form of consent is appropriate, SSO will consider the type of personal information it needs, the reason for its use, as well as the individual's reasonable expectations. SSO 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

SSO takes steps to ensure that coaches, volunteers, employees and board members are aware of the importance of maintaining the security and confidentiality of any personal information in our 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 us at any time to stop using information about you by contacting the Executive Director (subject to legal and contractual restrictions and reasonable notice). We will comply with your request as quickly as possible but there may be certain uses of personal information that we may not be able to stop immediately.

How to reach us

The Executive Director is accountable for SSO'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 Executive Director.