



## **Personal Information Protection and Electronic Document Act(PIPEDA)**

Halton Hawks FC are committed to keeping the personal information of its membership accurate, confidential, secure and private. This privacy policy has been designed to inform players, coaches, coaching staff, referees and parents of our commitment and recognition to our obligation to meet the spirit and terms of the federal Personal Information Protection and Electronic Documents Act.

### **POLICY:**

This Privacy Policy describes the principles the Halton Hawks FC will use to protect the privacy of personal information in its possession. It addresses the reasons why such information is collected, how it is used, how its confidentiality is protected and outlines the membership's rights in respect of this information.

This Privacy Policy incorporates and expands the 10 principles for the protection of personal information, as devised by the Canadian Standards Association (CSA). This Privacy policy does not apply to information regarding achievements of individuals or teams within the confines of the game of soccer.

REFERENCES: Personal Information Protection and Electronic Documents Act(PIPEDA)

<https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/>

## PERSONAL INFORMATION PROTECTION PRINCIPLES

### **Accountability:**

Halton Hawks FC is accountable for the protection of all personal information within the organization's possession or control, including any personal information that has been transferred to a third party for processing purposes. Halton Hawks FC will require a comparable level of protection of this information from its third-party relations.

### **Identifying Purposes:**

Personal information that Halton Hawks FC collects from its members includes:

- Name, age and sex of participate
- Address, telephone number(s) and email address of participate(s) including parents.
- Medical information to be used in case of emergency care.
- Participates past involvement within organized soccer including levels of play, seminars, clinics and levels of achievement recognized.

Halton Hawks FC's sole purpose for collecting this information is to insure the following criteria are met:

- All participants are identified via proper registration forms which may or may not include photo I.D.
- Participants can be assured other members of his or her team meet the age limits as predefined for the participants
- All participants in a position of instructor, referee, trainer or any other deemed necessary has been properly identified, qualifications provided and has been sanctioned by the ORSC Board of Directors.

**Consent:**

Halton Hawks FC will obtain consent before or when it collects, uses or discloses personal information about an individual. An individual can provide consent to the collection, use and disclosure of personal information about them expressly or implicitly. Halton Hawks FC will collect, use or disclose personal information without an individual's consent only in limited circumstances as permitted by law. Subject to certain legal and contractual restrictions and reasonable notice, an individual can refuse or withdraw their consent to the collection, use or disclosure of personal information about them at any time. Additional reference can be found on the reverse side of the Halton Hawks FC's registration form, under Section A (Consent for Use of Personal Information).

**Limiting Collection:**

Halton Hawks FC limits the amount and type of personal information it collects to that which is necessary for the business of the Leagues of Play Halton Hawks FC participates in. Each affiliate of Halton Hawks FC will be responsible for its own collection, use and disclosure of information, with exception to Ontario Soccer and Canada Soccer. Personal Information will be collected using procedures which are fair, transparent and lawful.

**Limiting Use, Disclosure and Retention:**

Halton Hawks FC will only use the personal information for the purpose for which it was collected as identified in principle #2, unless consent is given by the individual to use or disclose it for another purpose (i.e. newspaper articles). Under certain exceptional circumstances, Halton Hawks FC may have a legal duty or right to disclose personal information without the individual's knowledge or consent. Halton Hawks FC does not disclose this information to public bodies or individuals except as authorized by law. Halton Hawks FC keeps the information only for the length of time necessary to fulfil the purpose(s) for which it was collected. Currently Ontario Soccer requires that all registration data, and all data resulting from a game (game sheets, discipline reports, exhibition games, etc.) must be retained for 7 years after the end of the season, after which the personal information will be destroyed or made anonymous.

**Accuracy:**

In order to ensure accountability, all personal information will be kept accurate, complete and up to date. Individuals may challenge the accuracy and completeness of personal information about them and have it amended, as appropriate.

**Safeguards:**

In executing its responsibilities with respect to the confidentiality of personal information, Halton Hawks FC will employ a number of safeguards, appropriate to the sensitivity of the information, to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Such safeguards will include physical measures, organizational measures and technological measures, for example locked filing cabinets, restricted access to files, limiting access on a “need to know” basis, and securing member related information in a centrally-located, network secured storage medium, including any off site backup copies.

**Openness:**

Halton Hawks FC will make this policy relating to the protection of personal information available to all its members.

**Individual Access:**

Any member of Halton Hawks FC can have access to the personal information about them that is in Halton Hawks FC possession or control.

Any member may request that their personal information be amended for purposes of accuracy and completeness. Members can make their requests directly to **Halton Hawks FC** by:

**Telephone:** 416 618 1695 or **Email:** info@hhfc-academy.com

**Challenging Compliance:**

Any member of the Halton Hawks FC may challenge its compliance with this Privacy Policy by contacting the academy owner directly. Halton Hawks FC will develop policies and procedures to receive, investigate and respond to individuals' complaints and questions. If the individual(s) are not satisfied with the way Halton Hawks FC has responded to a complaint, the customer can contact the Privacy Commissioner of Canada. ([www.privcom.gc.ca](http://www.privcom.gc.ca))

Response to an individual's request will be made in a timely and efficient manner.