

PERSONAL INFORMATION PROTECTION POLICY

Updated: September 24, 2020

PURPOSE

At the British Columbia Freestyle Ski Association, hereafter referred to as Freestyle BC (FBC), we are committed to providing our members with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our members, protecting their personal information is one of our highest priorities.

While we have always respected our members' privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information as a result of British Columbia's *Personal Information Protection Act* (PIPA). PIPA, which came into effect on January 1, 2004, sets out the ground rules for how BC businesses and not-for-profit organizations may collect, use, and disclose personal information.

We will inform our members of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting members' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our members' personal information and allowing our members to request access to, and correction of, their personal information.

DEFINITIONS

1. These terms will have these meanings in this policy:
 - a. **"Personal Information"** – means information about an identifiable individual. For example, but not limited to; name, age, home address and phone number, FIS registration number, medical information, email address, and mobile phone number.
 - b. **"Contact information"** – means information that would enable an individual to be contacted at a place of business and includes name, position name or title,

business telephone number, business address, business email or business fax number. Contact information is not covered by this policy or PIPA.

- c. **“Privacy Officer”** – means the individual designated responsibility for ensuring that Freestyle BC complies with this policy and PIPA.
- d. **“Members”** – all categories of membership within FBC, as well as all individuals engaged in activities with FBC, including but not limited to, athletes, coaches, officials, judges, volunteers, staff, directors, officers, administrators, spectators, team personnel, the integrated services team, contractors, and parents of FBC members.

SCOPE

2. This Personal Information Protection Policy applies to Freestyle BC and its sanctioned clubs. This policy also applies to any service providers collecting, using, or disclosing personal information on behalf of Freestyle BC.

COLLECTING PERSONAL INFORMATION

3. Unless the purposes for collecting personal information are obvious and the member voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
4. We will only collect members’ information that is necessary to fulfill the following purposes:
 - a. To verify identity;
 - b. To identify member preferences;
 - c. To deliver requested programs and services;
 - d. To guarantee a travel or hotel reservation;
 - e. To process a newsletter subscription;
 - f. To enroll the member in a FBC program;
 - g. To enroll the member with a third-party service provider;
 - h. To send out association membership information;
 - i. To contact our members for fundraising and alumni events;
 - j. To ensure a high standard of service to our members;
 - k. To meet regulatory requirements;
 - l. To assess suitability for participation in events;
 - m. To collect and process payments;

CONSENT

5. We will obtain members' consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).
6. Consent can be provided orally, in writing, electronically, through an authorized representative or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the member voluntarily provides personal information for that purpose.
7. Consent may also be implied where a member is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, the marketing of new services or products, fundraising and the member does not opt-out.
8. Subject to certain exceptions (e.g., the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), members can withhold or withdraw their consent for Freestyle BC to use their personal information in certain ways. A member's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the member in making the decision.
9. We may collect, use or disclose personal information without the member's knowledge or consent in the following limited circumstances:
 - a. When the collection is clearly in the interests of the individual and consent cannot be obtained in a timely way;
 - b. When the collection is necessary for the medical treatment of the individual and the individual is unable to give consent;
 - c. If the collection is necessary to determine the individual's suitability (i) to receive an honour, award or similar benefit, including an athletic award, scholarship or bursary, or (ii) to be selected for team or program;
 - d. When the organization may collect personal information from or on behalf of another organization without consent of the individual to whom the information relates;
 - e. To assist that organization to carry out work on behalf of the other organization;
 - f. When the collection, use or disclosure of personal information is permitted or required by law;
 - g. In an emergency that threatens an individual's life, health, or personal security;
 - h. When the personal information is available from a public source (e.g., posted online);
 - i. When we require legal advice from a lawyer;
 - j. For the purposes of collecting a debt;
 - k. To protect ourselves from fraud;

- I. To investigate an anticipated breach of an agreement or a contravention of law.

USING AND DISCLOSING PERSONAL INFORMATION

10. We will only use or disclose the member's personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as:
 - a. To conduct member surveys in order to enhance the provision of our services;
 - b. To contact our members directly about programs and services that may be of interest;
 - c. To publicize select personal information at an event (e.g. age on personal bio at an event, displaying member age on posted scores/results, etc.);
 - d. To facilitate member programs using third party service providers (e.g. transferring member benefits to IST support people, Canadian Sport Institute, CanWest Ski Areas Association, etc.).
11. We will not use or disclose member's personal information for any additional purpose unless we obtain consent to do so.
12. We will not sell member lists or personal information to other parties.

RETAINING PERSONAL INFORMATION

13. If we use member's personal information to make a decision that directly affects the member, we will retain that personal information for at least one year so that the member has a reasonable opportunity to request access to it.
14. We will retain member's personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

ENSURING ACCURACY OF PERSONAL INFORMATION

15. We will make reasonable efforts to ensure that member's personal information is accurate and complete where it may be used to make a decision about the member or disclosed to another organization.
16. Members may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.
17. A request to correct personal information should be forwarded to the Executive Director.

18. If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and if needed send the corrected information to any organization to which we disclosed the personal information in the previous year. If the correction is not made, we will note the member's correction request in the file.

SECURING PERSONAL INFORMATION

19. We are committed to ensuring the security of members' personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
20. The following security measures will be followed to ensure that members' personal information is appropriately protected:
 - a. the use of locked filing cabinets;
 - b. physically securing offices where personal information is held;
 - c. the use of user IDs, passwords, encryption, firewalls;
 - d. restricting employee, contractor, and volunteer access to personal information as appropriate (i.e., only those that need to know will have access; contractually requiring any service providers to provide comparable security measures).
21. We will use appropriate security measures when destroying member's personal information such as:
 - a. shredding documents,
 - b. deleting electronically stored information.
22. We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

PROVIDING MEMBERS ACCESS TO PERSONAL INFORMATION

23. Members have a right to access their personal information, subject to limited exceptions. A full listing of the exceptions to access can be found in section 23 of PIPA.
24. A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought (e.g. for RPA Scores)
25. Upon request, we will also tell members how we use their personal information and to whom it has been disclosed if applicable.
26. We will make the requested information available within 30 business days or provide written notice of an extension where additional time is required to fulfill the request.

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27. A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the member of the cost and request further direction from the member on whether or not we should proceed with the request.
 28. If a request is refused in full or in part, we will notify the member in writing, providing the reasons for refusal and the recourse available to the member.

QUESTIONS AND COMPLAINTS: THE ROLE OF PRIVACY OFFICER OR DESIGNATED INDIVIDUAL

29. The Privacy Officer, Freestyle BC's Executive Director, is responsible for ensuring Freestyle BC's compliance with this policy and the Personal Information Protection Act.
30. Members should direct any complaints, concerns or questions regarding Freestyle BC's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the member may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Freestyle BC's Privacy Officer:

Executive Director
info@freestylebc.ski