



Kelowna Aquajets (KAJ)

Personal Information Protection Policy

Section: KAJ Social Policies

Date of Approval: June 21st, 2023

Approved by: KAJ Board of Directors

Policy Statement

Kelowna Aquajets ("KAJ") is committed to providing our members with exceptional service. Where 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 KAJ has 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 or the "Act"). PIPA sets out the ground rules for how B.C. businesses and organizations may collect, use, and disclose personal information.

KAJ 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.

Scope of this Policy

This Personal Information Protection Policy applies to KAJ and its membership as defined by the KAJ bylaws. This policy also applies to any service providers collecting, using, or disclosing personal information on behalf of KAJ.

1. Definitions

The following terms have these meanings in this Policy:

KAJ – Kelowna Aquajets

- a) Personal Information – means information about an identifiable individual. Personal information does not include contact information (described below).
- 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) Member – means a registered swimmer, swimmers' parent, coach, official, or volunteer, and/or as defined under KAJ By-laws.

2. Collecting Personal Information

a) 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.

b) We will only collect member information that is necessary to fulfill the following purposes: • To verify identity,

- For registration with a member for KAJ, Swim BC and Swimming Canada,
- To ensure swimmers compete in age-appropriate environments,
- To make travel arrangement for team travel and meet registration, which may include relevant medical information for coaches and chaperones,
- To establish athlete eligibility for selection to teams, whether by way of coaching decisions for selection to KAJ club groupings, competition and meet selection or via selection to different levels of competition within Swim BC, Swimming Canada, SNC, FINA, etc.
- To establish pertinent baseline performance data to assist coaching decisions in a provincial team competitive or training setting,
- To report non-identifying, demographic and participation statistics to funders, sponsors and other authorized third parties,
- To report and publishing athletes' names, genders, ages, club affiliations on KAJ and/or Swim BC web pages or in results, news releases and ranking reports,
- To make direct contact with registrants, volunteers, and staff as necessary for the operation of the KAJ,
- To send out KAJ membership information,
- To meet Swimming Canada requirements,
- To process financial payments and transactional information, and as governed by various websites KAJ uses to provide its services and process transactions (for example: Team Unify (SportsEngine), OnDeck (by NBC), and any other provider that the club may use to assist in providing its services. For specific privacy policy, terms of use and service of each respective system or website and/or app the club uses and how those sites collect and use our members information, please consult the privacy policy and terms of use of each respective website and/or app.

3. Consent

a) KAJ will obtain member consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent). This consent will also be required by the various websites and/or apps KAJ uses to provide its services, to which, KAJ members will also be required provide consent to the terms of use and privacy policy of the respective websites and/or apps to which KAJ uses to provide its services, if the member accesses those websites, and as required for KAJ to provide its services to members.

b) Consent can be provided electronically, 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.

c) 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 communications and the member does not opt-out. d) Subject to certain exceptions (e.g., the personal information is necessary to provide the registration and competition entry, and results ranking service, or the withdrawal of consent would frustrate the performance of a legal obligation),

members can withhold or withdraw their consent for KAJ 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. If so, we will explain the situation to assist the member in making the decision.

e) KAJ will not obtain consent from members who are minors, seriously ill, or mentally incapacitated. Consent from these individuals will be obtained from a parent, legal guardian, or a person having a power of attorney.

f) KAJ may collect, use or disclose personal information without the member's consent in the following limited circumstances:

- When the collection, use or disclosure of personal information is permitted or required by law,
 - In an emergency that threatens an individual's life, health, or personal security,
 - When the personal information is available from a public source (e.g., a telephone directory),
 - When we require legal advice from a lawyer,
 - For the purposes of collecting a debt,
 - To protect ourselves from fraud,
 - To investigate an anticipated breach of an agreement or a contravention of law.
- g) KAJ 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
- the individual consented to the use of the personal information by the other organization, and
 - the personal information is used by the organization 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.

4. Using and Disclosing Personal Information

a) KAJ will only use or disclose member personal information where necessary to fulfill the purposes identified at the time of collection or within this policy.

b) KAJ will not use or disclose member personal information for any additional purpose unless we obtain consent to do so.

c) KAJ will not sell member lists or personal information to other parties unless we have consent to do so.

5. Retention, Accuracy and Openness of Personal Information

a) If KAJ uses member 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.

b) Subject to 5 (a) above, we will retain member personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

c) KAJ will make reasonable efforts to ensure that member personal information is accurate and complete where it may be used to make a decision about the member or disclosed to another organization.

d) 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. A request to correct personal information should be made via club website (via Team Unify) and/or forwarded to the Club Registrar, as required.

e) If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and 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 members' correction request in the file.

6. Securing Personal Information

a) KAJ is committed to ensuring the security of member personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks. b) The following security measures will be followed to ensure that member personal information is appropriately protected:

- physically securing offices where personal information is held,
- the use of user IDs, passwords, encryption, firewalls; restricting employee access to personal information as appropriate
- Club registrar, board members, officials and others appointed by the organization will have access to the Swimming Canada Registration Tracking and Results System ("RTR") only as it pertains to our own club registrants. The Swim BC registrar will have access to the database only as it pertains to provincial registrants' members. Swimming Canada will be able to access the collected personal information of all registrants. Information is made available to additional staff members, as required pursuant to the purposes listed above.

c) KAJ will use appropriate security measures when destroying member's personal information such as shredding documents and deleting electronically stored information.

d) KAJ will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

7. Providing Members Access to Personal Information

a) Members have a right to access their personal information, subject to limited exceptions. b) A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.

c) Upon request, we will also tell members how we use their personal information and to whom it has been disclosed if applicable.

d) KAJ 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.

e) 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.