

# Privacy Policy



**March 10, 2017**

### **1. POLICY STATEMENT**

This Policy describes the way JUDO CANADA collects, uses, retains, safeguards, discloses and disposes of personal information, and states JUDO CANADA's commitment to collecting, using and disclosing personal information responsibly. This Policy is based on the standards required by PIPEDA, and JUDO CANADA's interpretation of these responsibilities.

Privacy of personal information is governed by the Personal Information Protection and Electronics Documents Act ("PIPEDA") and applicable provincial legislation governing personal information. A copy of JUDO CANADA's Privacy Policy is to be provided to any member upon request.

### **2. APPLICATION**

This Privacy Policy shall apply to all members of JUDO CANADA Board of Directors, Committee Members, staff, suppliers, contractors and decision makers of JUDO CANADA.

### **3. PERSONAL INFORMATION**

Personal information is information that can identify an individual either directly or through reasonably available information. 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 information which is not protected by applicable privacy legislation.

### **4. CONSENTING TO TERMS OF PRIVACY POLICY**

By providing personal information to JUDO CANADA, individuals are consenting to the use of the information for the purposes identified in this Policy. JUDO CANADA 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.

### **5. PURPOSES**

Personal information will be collected by JUDO CANADA to meet and maintain the highest standard of organizing, running, promoting and programming the sport of Judo. JUDO CANADA collects personal information of the nature and for such uses and purposes set forth below:

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- Name, address, phone number, cell phone number, fax number and e-mail address for communicating information from JUDO CANADA relating to programs, events, promotions, sponsorship, programs and events.
- Athlete information including height, uniform size, shoe size, feedback from coaches and trainers, performance results and biography information for outfitting uniforms, media relations, and components of team selection.
- 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 out-of-competition doping testing.
- NCCP number, education, resumes and experience for database entry at the Coaching Association of Canada to determine level of certification and coaching qualifications.
- Credit card information for purchasing equipment and for registration at leagues and tournaments and other events.
- Date of birth and athlete biography for media releases and to determine age group.
- Banking information and social insurance number for JUDO CANADA payroll.
- Personal health information including provincial health card numbers (in very limited instances), allergies, emergency contact and past medical history for use in the case of medical emergency.
- Marketing information including attitudinal and demographic data on individual members to determine membership demographic structure, and program wants and needs.
- Advertisements - Individuals providing their addresses or e-mail addresses to JUDO CANADA shall receive advertisements from JUDO CANADA, an alumni letter, a news-letter and donation request for fundraising.
- Detecting and protecting against fraud and error, negligence, breach of contract, theft and other illegal activity, and where necessary to meet our insurance requirements.
- Personal information reasonably necessary for purposes of determining suitability of team selection.
- Personal information reasonably necessary for purpose of determining suitability for carding allocation;
- Personal Information reasonably necessary for responding to emergencies at tournaments, training and other JUDO CANADA sponsored events.
- Communicating with our insurers and professional advisors;
- For employees of JUDO CANADA, we will maintain your Personal Information in an employee file, which will be collected and used for the purposes of decision making regarding your hiring, duties, transfer, training, discipline, evaluation, promotion and retention; recording and determining your eligibility for participation in various benefit plans offered by JUDO CANADA to employees, communicating this information to agents in the course of the performance of a contract or otherwise in our relationship with you;
- Personal information reasonably necessary to respond to your questions or concerns, as submitted by you;
- Personal information reasonably necessary to allow JUDO CANADA to provide such information reasonably required by Sport Canada, the International Judo Federation (IJF), the Canadian Olympic Committee, Own the Podium and other government

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funded organizations for purposes of determining funding, sanctions, discipline and other purposes within the mandate of the foregoing organizations; and

- Personal information as permitted by, and to comply with, applicable legal or regulatory requirements.

Our successors and assigns may collect, use and disclose personal information for substantially the same purposes as described in this Privacy Policy.

### **6. ACCOUNTABILITY**

The CEO, or his or her designate (which needs to hold a high-ranking position within JUDO CANADA) is the Privacy Officer and is responsible for the monitoring information collection and data security, and ensuring that all staff receives 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 by contacting JUDO CANADA's main phone number.

### **7. PERSONAL INFORMATION COLLECTED**

JUDO CANADA may collect the following personal information: Personal registration information shall include name, address, date of birth, gender, club affiliation, aboriginal declaration (if applicable), address, e-mail addresses and telephone numbers. Personal performance information shall include medical history, allergies, injury history, current medications and anthropometric data. Such other personal information as set forth in this Privacy Policy. Personal registration and performance information is entered electronically into electronic databases that seek to maintain accuracy, security and restricted access. Hard copy lists are also kept in a restricted access location at the JUDO CANADA offices.

Registration and results/rankings databases will be maintained by JUDO CANADA or a contracted third party for athlete registration and athlete results and rankings. Each club's registrar will have access to the data only as it pertains to its own club members.

Each provincial section registrar will have access to the data only as it pertains to its provincial registered members. JUDO CANADA as the parent organization will be able to access the collected personal information of all its registered members. JUDO CANADA staff access is restricted to the JUDO CANADA Registrar and information is made available to JUDO CANADA staff members only pursuant to the purposes listed above.

Provincial Sections or Provincial Sports Organizations in Canada (PSO) are subsidiaries of JUDO CANADA for reporting purposes under this Policy. Because PSOs have a more direct relationship with members, PSOs shall obtain the consent of members to collect, and disclose to JUDO CANADA, personal information solely for the purposes identified above.

## **8. LIMITING COLLECTION**

JUDO CANADA shall collect, use and disclose the least sensitive personal information reasonably possible to achieve the purposes. All personal information will be collected fairly, by lawful means and JUDO CANADA will not use any form of deception to obtain personal information.

## **9. LIMITING USE, DISCLOSURE AND RETENTION**

Personal information will not be used or disclosed by JUDO CANADA for purposes other than those for which it was collected as described herein, except with the consent of the individual or as otherwise permitted or required by law.

Personal information will be retained only that period necessary to achieve the purposes and to otherwise comply with JUDO CANADA's legal and regulatory requirements.

Personal information that is used to decide 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.

JUDO CANADA may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where JUDO CANADA 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.

Documents will be destroyed in a secured manner.

JUDO CANADA shall use reasonable means to ensure that any third party to whom it discloses personal information shall not use the personal information other than as authorized by JUDO CANADA and to otherwise protect such information in a manner consistent with the terms set forth herein.

## **10. ACCURACY**

JUDO CANADA 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 decide about an individual safeguard.

## **11. SECURITY**

Personal information is protected by security safeguards appropriate to the sensitivity of the information against loss or theft, unauthorized access, disclosure, copying, use or modification. Methods of protection and safeguards include, but are not limited to, locked filing cabinets, restricted access to offices, security clearances, need-to-know access and technological measures including the use of passwords, encryption and firewalls.

### **12. OPENNESS**

JUDO CANADA will publicize information about its policies and practices relating to the management of personal information. This information shall be on JUDO CANADA's web site or upon request by contacting the Privacy Officer,

The information available to the public includes:

- The name or title, address and telephone number of JUDO CANADA's Privacy Officer.
- The forms that may be used to access personal information or change information.
- A description of the type of personal information held by JUDO CANADA, including a general statement of its approved uses.

### **13. INDIVIDUAL ACCESS**

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

Requested information will be disclosed to the individual within thirty (30) days of receipt of the written request (unless there are reasonable grounds to extend the time limit) at no cost to the individual, or at nominal costs relating to photocopying expenses.

If personal information is inaccurate or incomplete, it will be amended as required.

An individual may be denied access to his or her personal information in accordance with applicable laws. Upon refusal, JUDO CANADA will inform the individual the reasons for the refusal.

### **14. CHALLENGING COMPLIANCE**

An individual may challenge JUDO CANADA's compliance with this Policy and PIPEDA, by submitting a challenge in writing to our Privacy Officer.

Upon receipt of a written complaint, JUDO CANADA 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 JUDO CANADA personnel or an independent investigator, who will have the skills to conduct a fair and impartial investigation,

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and 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 twenty-five (25) days of receipt of the complaint, the investigator will submit a written report to Judo Canada.
- (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 thirty (30) days of receipt of the complaint.

*Approved by Board on March 10, 2017*