

# PRIVACY POLICY

The Privacy Policy describes the way in which the Association collects, uses, retains, safeguards, discloses and disposes of the personal information of prospective members, members, and others including players, parents, trainers, coaches, referees, managers, volunteers and employees.

This Policy describes the way that the Association will, subject to applicable legal requirements, adhere to all relevant federal and provincial legislative privacy requirements. The Policy follows the ten Canadian Standards Association (CSA) principles identified in the federal Personal Information Protection and Electronic Documents Act (PIPEDA). The Policy describes each principle and the method of implementing each. The Association shall strive to meet or exceed federal and provincial legislative requirements and will ensure that it remains current with changing technologies and laws.

The Association reserves the right in its sole discretion to make whatever changes to its Privacy Policy it deems necessary and expedient. Any and all such changes will be posted to the Association web site.

The Association shall designate a Privacy Officer who will report to the Executive Committee and they are jointly accountable to the Association Directors for compliance with this policy. The Privacy Officer will be responsible for the Association's compliance with PIPEDA privacy principles and for responding to access requests, corrections and complaints in accordance with this Policy.

The Association's Privacy Officer will ensure that the Association is accountable for all personal information in its possession including that, which may be transferred to a third party. Third party organizations that handle information on behalf of the Association shall be contractually obligated to adhere to the standards of the Association Privacy Policy.

The Association shall implement internal policies, which will facilitate adherence to the Privacy Policies including but not limited to the following:

- Security measures at all levels designed to protect personal information in its possession;
- Procedures designed to respond to complaints and/or inquiries; and
- Staff training in all facets of information management, including awareness of the Association's Privacy Policy and subsequent policies and procedures developed in accordance with the Policy.

The Association shall only collect information necessary to conduct hockey programming. Access to our Privacy Policies and procedures will be readily available. Similarly, the process by which challenges may be made to the Association's compliance and/or adherence to the legislation in question shall be readily available

The Association recognizes that hockey, by its nature, is a contact sport and injuries are to a certain extent, inherent in the game. Medical records, medical history and medical forms of the individual may be of assistance in an emergency situation and as such may be requested. While participants are under no obligation whatsoever to supply this information and may refuse to do so without penalty, the Association will consider receipt of this information as consent for its subsequent use in an emergency medical situation

The Association will request individual permission for the use of any data collected which is extraneous to that which has been identified below, unless said usage is authorized or required by law.

Type of Personal Information	Purpose of Collecting
A participant's name, gender, place of residence and date of birth	To determine that the participant's geographical, division and level of play information are consistent with Association, Hockey Nova Scotia, and Hockey Canada regulations.
Historical information concerning past teams played for.	To determine if any Hockey Canada transfer regulations apply.
A participant's skill and development level and feedback on programs, honours and awards received.	To measure the success of our programs and maintain governance.
A participant's parents (if applicable); name, address, telephone number(s), email addresses and fax.	To facilitate emergency contact information and to ensure compliance with Hockey Canada residency regulations.
Educational information	To ensure all Hockey Canada residency regulations have been adhered to.
E-mail addresses and fax	To facilitate membership communication.
Skill levels, ability, emergency contacts and health concerns	To ensure our activities are carried out in a safe and health concerns secure environment.
Resumes	To identify potential future employment candidates (i.e. coaches, officials, etc.).
Registration information	To conduct research studies including but not necessarily limited to hockey demographic type research and To be made available to related organizations, Branches, associations, leagues and/or third party service providers.
Appeal Information	To administer appeals and any related proceedings, and the Rules, Regulations and By Laws of the Association, Hockey Nova Scotia, and Hockey Canada.

All information is kept for the duration of seven years or as long as required to fulfill the purposes identified, unless permission is obtained from the member providing the information to hold it for a different length of time. The Association will endeavour to advise potential registration candidates of the purpose for the collection of their data at the time of registration. This information will be made available by reference to the Association's website.

The Association will further endeavour to ensure that all collectors of the personal information are familiar with the potential use of the data. Any other purpose of collection will be stated at time of collection.

All data collected by the MMHA shall be maintained in the Association office and/or secured files. The Association may also use information about user access to secure areas of the Association website or the on-line registration website. Information you are asked to provide during your use of the Association website or the on-line registration website may include your name, address, e-mail address, age, sex and will be treated within the same parameters as other personal information.

## Consent

All members of the Association have the ability to consent to the use of their personal information on an annual basis. A member of the Association agrees that the act of registering constitutes implied consent to such use of their personal information by the Association, Hockey Nova Scotia, and Hockey Canada. The Association may collect personal information without consent where reasonable to do so and where permitted by law.

## Limiting Collection

The Association and its member Partners shall only collect personal information in a fair and lawful manner as set forth in this Privacy Policy. The Association shall not indiscriminately collect information. The amount and type of information collected shall be limited to that which is required to fulfill its identified purposes. The Association will not use any form of deception in gaining personal information from its members.

## Limiting Use, Disclosure and Retention

The Association shall limit the use of personal information collected to purposes that are listed in 'Identifying Purposes' and 'Consent' and will not disclose the information for other purposes except as authorized or required by applicable law. Prior to enlisting the services of third party organizations, the Association will contractually commit those parties to treat your personal information in a manner consistent with this Privacy Policy. The Association may disclose your personal information to a government authority that has asserted its lawful authority to obtain the information or where the association 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, person, or body with jurisdiction to compel the production of the information or otherwise as authorized or required by applicable law. The Association may at its discretion release personal information for the purposes of collecting debts, which may be owed to the Association. The Association shall retain documents concerning registration, performance activities, discipline, events and honours and awards received for specific periods of time dependant upon necessity or destroyed accordingly when it is deemed appropriate. More specifically:

- Registration data will be retained for a three-year period after an individual has left the Association programs in the event that an individual chooses to return to the Association programs after leaving; and
- Parental/Family information will be maintained for a similar three-year period after a member has left our programs.

Other personal information will be retained by the Association for regulated timeframes as requested by legislation governing its operation and/or the information provided, after, which time (unless consent is given to keep information for a longer period) the information will be destroyed in a secure manner. If there are no legislative requirements to retain other information it will be kept for a minimum of 24 months from the time it was provided.

## Accuracy

The Association shall strive to ensure to the extent that it can, that the information entrusted to it is maintained in an accurate manner. Members will have the ability to view and review data provided on their application for membership at any time by contacting the Privacy Officer. The Association shall attempt to maintain the privacy

interests of the individual and attempt to ensure that decisions are not made for or about an individual based on personal information that may be flawed. The Association shall only update information if a request is made in writing.

## Safeguards

Security safeguards will be implemented to ensure your personal information is protected from theft as well as unauthorized use or access, disclosure, copying, or modification thereof. All information collected by the Association will be considered highly sensitive. As such, a high level of security will be practiced at all times. Methods of protection and safeguards to be employed shall include but in no way be necessarily limited to locked files, offices and storage areas, security clearances and need to know access as well as technological measures such as passwords and encryption. These measures will be subject to yearly reviews by the Association and its Privacy Officer to ensure the best methods possible are being utilized to maximize effectiveness.

## Openness

The Association publicly discloses the methods by which personal information is handled. This information is readily available through its Privacy Policy, on its website or upon request by contacting the Association Privacy Officer. The information available includes:

- The name address and phone number of the Association Privacy Officer;
- The requests to access your information or change your information; and
- A description of the type of personal information and our general uses thereof.

If any participant shall have a question regarding the personal information collected, the investigation may be initiated to the Association Privacy Officer.

## Individual Access

Upon request by the individual concerned, subject to applicable legislation, the Association shall disclose whether or not it actually holds personal information on an individual. The Association shall disclose the source of this information when requested and provide an account of third parties to whom the information may have been disclosed. The Association may request sufficient information to confirm your identity before releasing any personal information to you. Subject to applicable legislation, the Association shall endeavour to provide this information within thirty days of receipt of the request for information and only charge nominal fees for the purpose of satisfying its expenses incurred in the supply of requested information. This information shall be in format understandable to you. A member may challenge the accuracy and completeness of the information through written request and any inaccurate information, which may be so validated, shall be corrected and any third parties shall be notified of the corrections as per (Consent).

## Challenging Compliance

The Association has established a set of procedures for the resolution of grievances in the administration of its Privacy Policy. Prospective members and staff may challenge the Association's compliance with this Policy by contacting the Association's President or/and Privacy Officer. Upon receipt of a complaint the Association shall make available the complaint procedures, which will be simple and easy to access. The Association shall investigate all complaints received. If the complaint is deemed justified, the Association shall take the appropriate steps to ensure that compliance is achieved and will make any necessary changes to its policies to allow for compliance in the future. All complaints shall be addressed to the Association Privacy Officer. Association policies and procedures must be adhered to in order to have the challenge dealt with in an appropriate and timely fashion.