

## **TORONTO ISLAND CANOE CLUB**

### **POLICY CONCERNING THE PROTECTION OF PERSONAL INFORMATION**

#### **Introduction**

Toronto Island Canoe Club (TICC) is a not-for-profit amateur sport organization. In the course of providing our programs and services, TICC may collect Personal Information and we have prepared this policy to inform you about TICC's ongoing commitment to ensuring that the Personal Information obtained during the course of our activities remains accurate and confidential.

#### **What is Personal Information?**

We consider "Personal Information" to mean any information, recorded in any form, about an identified individual or an individual whose identity may be inferred or determined from such information, other than business contact information (e.g. name, title, business address). This policy does not cover aggregated data from which the identity of an individual cannot be determined. TICC retains the right to use aggregated data in any way that it determines appropriate.

#### **Why TICC May Collect Personal Information**

TICC may use the Personal Information provided verbally or in writing (including via electronic media) in order to:

- (a) Administer competitions and all matters relating to the sport of paddling
- (b) Track participant information
- (c) Manage our relationships, and communicate, with participants, Clubs, Divisions, Provincial and National affiliates.
- (d) Meet legal and regulatory requirements; and
- (e) Such other purposes consistent with these purposes.

The Personal Information we request will depend upon which services you may wish to obtain.

*Approved by the TICC Board of Directors February 23, 2020*

## **How TICC Collects and Uses Personal Information**

TICC only collects, uses and discloses Personal Information for purposes that would be considered reasonable in the circumstances and only such information as is required for the purposes of providing services or information to participants, Clubs, Divisions, Provincial and National affiliates. We use only fair and lawful methods to collect Personal Information.

Our use of Personal Information is limited to the purposes described in this Policy and TICC does not otherwise sell, trade, barter, exchange or disclose for consideration any Personal Information it has obtained.

## **When TICC May Disclose Your Personal Information**

TICC may disclose your Personal Information to:

- a) Governmental agency funders of TICC;
- b) Print and electronic media in connection with awards and recognition programs;
- c) Individuals or organizations who are our advisers or service providers; and

In the event sensitive Personal Information is provided to TICC, we will not disclose such Personal Information unless it is required in order to provide a participant or partner organization with our services.

Where TICC discloses Personal Information to organizations that perform services on its behalf, we will require those service providers to use such information solely for the purposes of providing services to TICC, participants, partner organizations or the person concerned and to have appropriate safeguards for the protection of that Personal Information.

Please note that there are circumstances where the use and/or disclosure of Personal Information may be justified or permitted or where TICC is obliged to disclose information *without* consent. Such circumstances may include:

- a) Where required by law or by order or requirement of a court;
- b) Where TICC believes, upon reasonable grounds, that such action is necessary to protect the rights, privacy, safety or property of an identifiable person or group;
- c) Where it is necessary to establish or collect monies owing to TICC;
- d) Where it is necessary to permit TICC to pursue available remedies or limit any damages that we may sustain; or
- e) Where the information is already public.

Where obliged or permitted to disclose information without consent, TICC will not disclose more information than is required.

*Approved by the TICC Board of Directors February 23, 2020*

## **Consent**

Unless, permitted by law, no Personal Information is collected, without first obtaining the consent of the individual concerned to the collection, use and dissemination of that information. However, we may seek consent to use and disclose Personal Information after it has been collected in those cases where TICC wishes to use the information for a purpose not identified in this Policy or not previously identified or for which the individual concerned has not previously consented.

**By providing Personal Information to TICC you agree and consent that we may collect, use and disclose your Personal Information in accordance with this Policy.** In addition, where appropriate, specific authorizations or consents may be obtained from time to time.

In most cases and subject to legal and contractual restrictions, any member is free to refuse or withdraw your consent at any time upon reasonable, advance notice. It should be noted that in certain circumstances, certain services can only be offered if you provide Personal Information to TICC. Consequently, if you choose not to provide us with any required Personal Information, we may not be able to offer you the service requested. We will inform you of the consequences of the withdrawal of consent.

## **The Accuracy and Retention of Personal Information**

TICC endeavours to ensure that any Personal Information provided and in its possession is as accurate, current and complete as necessary for the purposes for which we use that information. If we become aware that Personal Information is inaccurate, incomplete or out of date, TICC will revise the Personal Information and, if necessary, use the best efforts to inform third parties which were provided with inaccurate information so that those third parties may also correct their records.

We keep your personal Information only as long as it is required for the reasons it was collected. The length of time we retain information varies, depending on the service and the nature of the information. This period may extend beyond the end of a person's relationship with us but it will be only for so long as it is necessary for us to have sufficient information to respond to issues that may arise at a later date.

When your personal information is no longer required for TICC's purposes, we have procedures to destroy, delete, erase or convert it into an anonymous form.

*Approved by the TICC Board of Directors February 23, 2020*

## **Protection of Personal Information**

TICC endeavours to maintain appropriate physical, procedural and technical security so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of Personal Information. This also applies to our disposal or destruction of Personal Information.

TICC further protects Personal Information by restricting access to it to those employees, volunteers, and individuals that the management of TICC has determined need to know that information in order that TICC may provide our services or information.

If an employee or volunteer of TICC misuses Personal Information, this will be considered as a serious offence for which disciplinary action may be taken, up to and including termination of employment or volunteer service. If any individual or organization misuses Personal Information – provided for the purpose of providing services to or for TICC – this will be considered a serious issue for which action may be taken, up to and including termination of any agreement between TICC and that individual or organization.

## **Access to Your Personal Information**

TICC permits the reasonable right of access and review of Personal Information held by us about an individual and will endeavour to provide the information in question within a reasonable time, generally no later than 30 days following the request. To guard against fraudulent requests for access, we may require sufficient information to allow us to confirm that the person making the request is authorized to do so before granting access or making corrections.

TICC will provide information from our records in a form that is easy to understand. TICC reserves the right not to change any Personal Information but will append any alternative text the individual concerned believes to be appropriate.

TICC reserves the right to decline to provide access to Personal Information where the information requested:

- a) Would disclose Personal Information, including opinions, about another individual or about a deceased individual;
- b) Is subject to solicitor-client or litigation privilege;
- c) Is not readily retrievable and the burden of cost of providing would be disproportionate to the nature or value of the information;
- d) Does not exist, is not held, or cannot be found by TICC;
- e) May harm or interfere with law enforcement activities and other investigative or regulatory functions of a body authorized by law to perform such functions; or
- f) May be withheld or is requested to be withheld under applicable legislation.

Where information will not or cannot be disclosed, the individual making the request will be provided with the reasons for non-disclosure.

TICC will not charge any member for verifying or correcting your information. However, to the extent permitted by applicable law, there may be a minimal charge imposed if you need a copy of records.

## **Resolving Your Privacy Concerns**

In the event of questions about: (i) access to your Personal Information; (ii) our collection, use, management or disclosure of Personal Information; or (iii) this Policy; please contact TICC's Board of Directors by sending an e-mail to [torontoislandcanooclub@yahoo.ca](mailto:torontoislandcanooclub@yahoo.ca).

TICC will investigate all complaints and if a complaint is justified, we will take all reasonable steps to resolve the issue.

*Approved by the TICC Board of Directors February 23, 2020*