

## **CALGARY UNITED SOCCER ASSOCIATION PRIVACY POLICY**

### **PURPOSE OF THIS POLICY**

CUSA is committed to maintaining the accuracy, confidentiality and security of personal information. The Personal Information Protection and Electronics Documents Act (PIPEDA, Government of Canada), the principals of the Personal Information Protection Act (PIPA, Government of Alberta) and the ten principles of the Canadian Standards Association (CSA) Model Code for the Protection of Personal Information govern privacy of personal information. This policy describes the way that CUSA collects, uses, retains, safeguards, discloses and disposes of personal information, and states CUSA's commitment to collecting, using and disclosing personal information responsibly. This policy is based on the standards required by PIPEDA, PIPA, and CUSA's interpretation of these responsibilities.

### **BACKGROUND**

In order to organize and operate the amateur soccer league, the business of CUSA includes:

- Representing CUSA members in the various organizing bodies such as Calgary Soccer Federation, Alberta Soccer Association and their related committees.
- Establishing, maintaining and enforcing the Rules and Regulations, Discipline Code and the Bylaws, which govern CUSA Members.
- Provide and maintain facilities for the administration and the playing of the game of soccer.
- Identify and capitalize on innovations and opportunities, which enhance the game and the organization for the benefit of CUSA members.
- Act in a fiduciary capacity in administering the finances of CUSA to ensure that members receive fair value for their fees and that their organization remains financially secure.
- Provide an environment conducive to equitable competition in the spirit of fair play.
- Provide the opportunity for high performance players and teams to pursue provincial and national competition.

### **WHAT IS PERSONAL INFORMATION?**

For the purposes of this Privacy Policy, personal information is any information about an identifiable individual, other than the person's business title or business contact information when used or disclosed for the purpose of business communications. Personal information does not include anonymous or non-personal information, i.e., information that cannot be associated with or traced back to a specific individual.

### **APPLICATION OF PRIVACY PRINCIPLES**

As part of the commitment to maintaining the accuracy, confidentiality, and security of personal and financial information, CUSA has adopted the Ten Privacy Principles to govern actions as they relate to personal information.

## **PRINCIPLE 1 - ACCOUNTABILITY**

CUSA has appointed a Privacy Officer who is accountable for ensuring compliance with the CUSA Privacy Policy and Guidelines. Accountability rests with the Privacy Officer even though other individuals within the CUSA may take responsibility for the day-to-day collection and processing of personal information. The Privacy Officer for CUSA is the Executive Director while the person (s) responsible for the day-to-day collection and processing of personal information are CUSA staff members.

CUSA is responsible for all personal information in its possession or control, including information that has been transferred to a third party for processing. CUSA will use contracts or other means to provide an appropriate level of protection when a third party processes information on behalf of the association.

CUSA will, from time to time, establish procedures to implement its commitment to privacy, including:

- Procedures to protect personal information;
- Procedures to receive and respond to complaints and inquiries;
- Communications and training programs to provide information to the CUSA's staff about privacy policies and practices.

## **PRINCIPLE 2 - IDENTIFYING PURPOSES FOR COLLECTION, USE AND DISCLOSURE**

CUSA identifies the purposes for which personal information is collected at or before the time the information is collected, and documents those purposes.

CUSA collects only that information necessary for the purposes that have been identified.

CUSA specifies, verbally, electronically or in writing, and explains the identified purposes(s) to the individual at or before the personal information is collected. When personal information is collected for a purpose not previously identified, the new purpose is communicated to the individual prior to use. In such cases, the consent of the individual is required before the information is re-used.

CUSA collects personal information from individuals in order to meet and maintain the highest standard of organizing and programming the sport of soccer. CUSA collects personal information from prospective members, coaches, referees, participants, managers, employees and volunteers for purposes that include, but are not limited to, the following:

- Screen individuals for employment, volunteer or contracting suitability;
- Manage and administer personnel, including performance appraisal, security and access control and discipline;
- Manage and administer compensation and benefits programs;
- Administer payroll;
- Administer occupational health and safety programs;
- Monitor and track skills and competency development;

- Meet legal and regulatory requirements, i.e. Employment Standards legislation, provincial gaming legislation, Canada Customs and Revenue Agency reporting requirements;
- Credit card information for registration including league, events, clinics, conferences and for purchasing equipment, coaching manuals and other resources;
- Facilitate CUSA audits when required to do so.

CUSA may share personal information with other parties but only in the following circumstances:

- In order to administer the services CUSA provides to individuals, the association may share information organizations such as data storage providers or companies that provide insurance or registration services;
- We may share information with other teams you play with;
- We may disclose incidents to authorities;
- Take disciplinary actions resulting from incidents;
- To comply with legal and insurance requirements;
- To provide referee coordinators with names of possible referees;
- To register you with the Alberta Soccer Association;
- Provide contact information of CUSA employees and volunteers to CUSA's insurers.
- Individuals providing their addresses or e-mail addresses to CUSA will receive email notices regarding programs and events and may receive advertisements from CUSA sponsors.
- We may utilize photographs, videotapes or digital recordings from CUSA programs, competitions and courses or clinics for media relations and promotions including the CUSA website.

We may request that participants provide such information as required for administration of CUSA programs:

- To identify individuals;
- To identify individual for program related actions, i.e. team or club contact, game participation, scoring or discipline;
- To register individual in soccer leagues, tournaments or clinics;
- Marketing information including attitudinal and demographic data on individual members to determine membership demographic structure, and program wants and needs;
- Athlete and coach information for media relations, publishing results and components of selection;

We will not sell individual personal information to any organization for any purpose.

### **PRINCIPLE 3 – CONSENT FOR THE COLLECTION, USE OR DISCLOSURE**

CUSA uses reasonable efforts to ensure that individuals understand how their personal information will be used. CUSA obtains consent as required for the collection, use and disclosure of personal information, except where inappropriate.

CUSA will not collect, use or disclose the personal information of a person without the individual's knowledge and consent, except in certain limited circumstances permitted by law, such as where immediate health of a person is at risk, or in connection with the breach of an agreement or a law.

CUSA will obtain consent, either express or implied, for the use or disclosure of personal information at the time of the collection of the information. In certain circumstances, consent with respect to use or disclosure will be sought after the information has been collected but before use, particularly if CUSA wants to use the information for a purpose not previously identified to the individual.

CUSA is committed to obtaining meaningful consent to the collection, use and disclosure of personal information. To achieve this aim, the purposes for which the information will be used, if not obvious, will be explained in such a manner that the individual can reasonably understand how the information will be used or disclosed.

CUSA will not, as a condition of the supply of a product or service, unreasonably require an individual to consent to the collection, use, or disclosure of information beyond what is required in the circumstances.

The way in which CUSA seeks consent may vary, depending on the circumstances and the type of information collected. In determining the type of consent that may be required, CUSA will consider the nature of the information, the use to which the information will be put, applicable laws and the type of interaction in which the information is provided.

Consent may be express or implied, given orally, electronically or in writing and provided by an action or inaction. Consent may be given through a legally appointed representative or a legal guardian.

An individual, subject to legal or contractual limitations, may withdraw his or her consent at any time on sufficient notice to CUSA. Withdrawal of consent may result in CUSA becoming unable to provide or continue to provide the person with certain services, or membership and the individual will be given notice of the implications of the withdrawal of his or her consent.

#### **PRINCIPLE 4 - LIMITING COLLECTION**

CUSA limits the amount and type of personal information collected to that which is necessary for the identified purpose.

CUSA collects information by fair and lawful means.

CUSA may collect the following information from employees and contractors:

- Demographic and contact information including home address and telephone number, date of birth, social insurance number, Email address and gender;
- Education and employment history;
- Banking or financial information;
- Health information;

- Security background checks, as required.

CUSA may collect the following personal information from board members and other volunteers:

- Demographic and contact information including home address and telephone number, date of birth, Email address, business name, address and telephone number;
- Education and employment history;
- Areas of interest and expertise;
- History of community involvement;
- Criminal records check, Canadian Police Security Clearance.

CUSA may collect the following personal information from members of the CUSA:

- Criminal records check, Canadian Police Security Clearance.
- Names and contact information, including home address, Email address, date of birth and telephone numbers;
- Individual photograph for membership card identification;
- Demographic information about membership, including coaching certification, interest in programs or facilities, for program planning purposes;
- Limited medical information for members participating in sporting activities;
- Athlete information including feedback from coaches and trainers, performance results, biography information for required registration forms, media relations, publishing results and components of selection.

CUSA may collect personal information through the following means:

- Solicited and unsolicited resumes and correspondence;
- Completed application forms, paper or on-line format, for employment, benefits, grants and bursaries, volunteer opportunities, sports and other program registrations, etc.;
- In person and through telephone interviews;
- On-line forms through the website.

#### **PRINCIPLE 5 - LIMITING USE, DISCLOSURE AND RETENTION**

CUSA does not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law.

Notwithstanding the above, CUSA may disclose personal information without consent:

- To a lawyer representing CUSA;
- To a company or individual employed by CUSA to perform functions on its behalf, i.e. outsourced information processing function, administration of health services plan;
- In order to collect a debt owed by the individual to CUSA;
- To comply with a subpoena, warrant, or court order;
- As required or authorized by law, i.e. Employment Standards legislation;
- When the information is publicly available, i.e. telephone directory information;
- To a public authority in the event of imminent danger to any individual.

CUSA obtains consent for all other disclosures of personal information for purposes other than those for which the information was initially collected, i.e. to provide references regarding current or former employees. CUSA does not require consent to confirm an individual's employment record, i.e. confirm years of employment, and position held.

Only CUSA employees or volunteers with a business need-to-know, or whose duties so require, are granted access to personal information.

CUSA has developed guidelines and implemented procedures with respect to the retention of personal information. CUSA retains personal information only as long as it is necessary for the identified purpose, or as required by law. Where personal information is used to make a decision about an individual, CUSA retains the information, or the rationale for making the decision; long enough to allow the individual access to the information after the decision has been made.

Personal information that is no longer required to fulfill the identified purposes or required by law to be retained is destroyed, erased or made anonymous.

#### **PRINCIPLE 6 - ACCURACY**

CUSA ensures that personal information collected, used and disclosed is as accurate, complete and up-to-date as necessary for the intended purpose.

Personal information is kept sufficiently accurate, complete and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about the subject individual.

CUSA updates personal information as and when necessary to fulfill the identified purpose or upon notification by the individual who is the subject of the information.

#### **PRINCIPLE 7 – SAFEGUARDING INFORMATION**

CUSA protects personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, regardless of the format in which it is held.

CUSA has developed and implemented information security policies and procedures that outline physical, organizational, and technological measures in place to protect personal information as appropriate to the sensitivity of the information.

CUSA protects personal information disclosed to, or processed by third parties by contractual agreements, which address the following as necessary:

- Identifying the types of records provided, collected, created, or maintained in order to deliver the service, and specifying any applicable privacy legislation;
- Stipulating the confidentiality of the information and the purposes for which it is to be used, requiring the third party provides at least the same level of protection that CUSA does;
- Identifying the organization(s) having custody and control of the records, including the responsibility and process for handling requests for access to information;

- Ensuring that third parties and their employees having access to CUSA's information assets are aware of, and understand their responsibility to adhere to CUSA's information handling and security policies, including maintaining the confidentiality of personal information;
- Ensuring that CUSA has access to information produced, developed, recorded or acquired by third parties as a result of the contract, including timely access in response to requests for information, and specifying that third parties shall not deny access to, or retain custody of, personal information because of late or disputed payment for services;
- Requiring third parties to report breaches of confidentiality and privacy to CUSA's Privacy Officer within 48 hours of knowing that the breach occurred;
- Addressing disaster recovery and backup of any information assets and systems in the custody of the third party;
- Addressing the disposition, i.e. destruction or return, of all of CUSA's information assets, i.e. records, hardware, system documentation, upon termination of the contract;
- Specifying any audit or enforcement measures that CUSA will undertake to ensure that third parties comply with information handling and security provisions outlined in contractual agreements, for example, non-disclosure agreements, audit trails, regular review of third party access requirements, inspection of third party premises.

CUSA ensures that all employees and volunteers are aware of its privacy policies and procedures, and understand the importance of maintaining the confidentiality of personal information.

Care shall be taken in the disposal or destruction of personal information to prevent unauthorized parties from obtaining access to the information.

#### **PRINCIPLE 8 - OPENNESS**

Upon request, CUSA makes available specific information about its policies and practices relating to the management of personal information, including:

- The means of gaining access to personal information held by CUSA;
- Identification of personal information held by CUSA, and a general account of its use;
- A copy of any brochures or other information explaining CUSA's Privacy Policy, Guidelines and related procedures;
- Reference to the statement of CUSA Privacy Policy on the CUSA website, if applicable.

To make an inquiry or lodge a complaint about CUSA's personal information handling policies and procedures, contact:

CUSA Privacy Officer  
 Unit 19 1915 32 Ave NE  
 Calgary, AB, T2E 7C8  
 (403) 270-0363  
[privacyofficer@cusa.ab.ca](mailto:privacyofficer@cusa.ab.ca)

## **PRINCIPLE 9 - INDIVIDUAL ACCESS**

Upon request, CUSA provides individuals with access to their personal information held by the association. Individuals have the right to challenge the accuracy and completeness of their personal information held by CUSA, and to have it amended as appropriate.

All requests by individuals, i.e. members, employees, volunteers, contractors, to access their personal information held by CUSA, or to correct or amend their personal information, should be directed to the designated Privacy Officer. Such requests shall be in writing.

CUSA responds to written requests for access to personal information within 30 business days.

In order to safeguard personal information, CUSA may request sufficient information from the individual to verify that person's identity.

CUSA may charge a reasonable fee to cover its cost of providing the information, provided that CUSA will inform the individual of the approximate cost of providing the information prior to doing so and will afford the individual the opportunity to withdraw his or her request.

CUSA provides individuals access to their personal information subject to limited and specific exceptions. The CUSA will refuse access to personal information if:

- CUSA has disclosed information to a government institution for law enforcement or national security reasons;
- It would reveal personal information about a third party unless there is consent or a life-threatening situation;
- Doing so could reasonably be expected to threaten the life or security of another individual;
- The disclosure would reveal confidential commercial information; or
- The information is protected by solicitor-client privilege.

If access to information is refused, CUSA shall, in writing, inform the individual of the refusal, the reason(s) for the refusal, and any recourse the individual may have to challenge CUSA's decision.

CUSA corrects or amends personal information as required when an individual successfully demonstrates the inaccuracy or incompleteness of the information. Amendment may involve the correction, deletion, erasure, or addition to any personal information found to be inaccurate or incomplete.

Any unresolved differences as to accuracy or completeness shall be noted in the individual's file. Where appropriate, CUSA shall inform any third parties having access to the personal information in question as to any amendments, or the existence of any unresolved differences between the individual and CUSA

## **PRINCIPLE 10 – HANDLING COMPLAINTS AND SUGGESTIONS**

CUSA investigates all complaints concerning compliance with its Privacy Policy, Guidelines and practices, and responds within 30 days of receipt of a complaint. If a complaint is found to be justified, CUSA takes appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. Individuals shall be informed of the outcome of the investigation regarding their complaint.

Complainants may address inquiries or complaints concerning compliance with these policies or guidelines by contacting the CUSA Privacy Officer as set out in these Guidelines under Principle 8 -Openness.

A complaint may also be addressed in writing to either:

Privacy Commissioner of Canada	Office of the Information and Privacy Commissioner of Alberta
112 Kent Street	#410 – 9925 – 109 <sup>th</sup> Street
Ottawa, ON. K1A 1H3	Edmonton, AB, T5K 2J8
	780-422-6860 <a href="http://www.oipc.ab.ca">www.oipc.ab.ca</a> .

## **REVISIONS**

Any changes to our privacy policy and information handling practices shall be acknowledged in this policy in a timely manner. We may add, modify or remove portions of this policy when we feel it is appropriate to do so.

## **INTERPRETATIONS OF THIS POLICY**

Any interpretation associated with this Privacy Policy will be made by the Privacy Officer. This Privacy Policy includes examples but is not intended to be restrictive in its application to such examples, therefore where the work 'including' is used, it shall mean 'including without limitation.' This Privacy Policy does not create or confer upon any individual any rights, or impose upon CUSA any rights or obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and Canada's federal and provincial privacy laws, as applicable, this Privacy Policy shall be interpreted, in respect to that case, to give effect to, and comply with, such privacy laws.