



Privacy Policy			
Reviewed:	February 8, 2022	Effective:	February 8, 2022
Next Review:	February 2023	Approval:	Board of Directors

Central Toronto Athletic Club (CTAC) is subject to the Personal Information Protection and Electronic Documents Act (PIPEDA) (“the Act”). PIPEDA requires Canadian not-for-profits to adhere to ten (10) privacy principles to ensure fair information practices that in turn form the ground rules for the collection, use and disclosure of personal information.

In accordance with the Act, CTAC is responsible for the protection of personal information and the fair handling of it at all times both throughout the organization and in dealings with third parties.

#### APPLICATION

- (a) This policy provides direction on how personal information is collected, used and disclosed within CTAC.
- (b) CTAC will comply fully with the principles and exceptions set out in the Act.
- (c) CTAC adheres to policies that are substantially similar to the Athletics Ontario (AO) Privacy Policy.

#### PRINCIPLES OF FAIR INFORMATION PRACTICES

##### 1. Responsibility and Accountability

CTAC is responsible for maintaining and protecting all personal information that it collects.

The CTAC President has the primary responsibility for ensuring compliance with the AO Privacy Policy as set out herein and has the authority to intervene on privacy issues that relate to any of CTAC’s operations. As such, the President is responsible for:

- (a) Collecting, using and disclosing of personal information;
- (b) Responding to requests and general inquiries for personal information;
- (c) Responding to requests for correction to personal information;
- (d) Responding to complaints about the collection, use and disclosure of personal information by CTAC;
- (e) Explaining the purpose(s) for the collection, use and disclosure of personal information;
- (f) Explaining the procedure to withdraw consent and the consequences, if any, of such a withdrawal.

The President may delegate any responsibilities set out herein to another CTAC employee or to an individual approved by the CTAC Board. All CTAC club administrators, coaches, officials and employees, or any individual approved by the Board to handle any responsibilities set out herein, are required to understand and adhere to the AO Privacy Policy.

## **2. Identifying Purposes**

The purposes for which personal information is collected shall be identified by or on behalf of CTAC at or before the time the information is collected. This includes the reason(s) for collecting the information and how it will be used. If the reason(s) for collecting the information and/or how it will be used changes after the information is collected, CTAC will inform the affected individual(s) and obtain consent before the information is used.

## **3. Consent**

CTAC requires an individual's consent for the collection, use, or disclosure of personal information:

- (a) Before or when any personal information is collected by or on behalf of CTAC, or when the reason(s) for collecting the information and/or how it will be used changes, CTAC will obtain consent from the individual whose personal information is collected, used or disclosed.
- (b) For an individual who is a minor, seriously ill, or mentally incapacitated, consent may be obtained from a legal guardian, or person having power of attorney.
- (c) Consent may be obtained in person, by phone, by fax, by mail, by email or by internet, or by any other reasonable method, whether express or implied.

Personal information may be collected from more than one source and combined.

## **4. Limiting Collection**

CTAC limits the information it collects to what is needed for specific purposes identified by the association at the time the personal information is collected. Information is collected by fair and lawful means.

## **5. Limiting Use, Disclosure, and Retention**

CTAC will limit the use and disclosure of the personal information it has collected to the purpose(s) for which it was collected, unless the individual otherwise consents or the use or disclosure is authorized by law.

Where possible, CTAC will use contracts or other agreements to ensure the protection of personal information that has been collected by CTAC and that is transferred to a third party (i.e., Athletics Ontario) for use, including but not limited to:

- (a) The personal information transferred to a third party will be limited to what is needed by and for the purposes necessary for the third party to fulfil the contract or agreement.
- (b) The third party will be required to refer to CTAC any requests for access to or complaints about the information provided.
- (c) When the personal information is no longer required by the third party, the third party will be required to either return the information to CTAC or dispose of it in a manner acceptable to CTAC.

Personal information collected by or on behalf of CTAC will be retained only as long as necessary to satisfy the purpose(s) for which it was collected. Any personal information collected by or on behalf of CTAC that is no longer required for an identified purpose or a legal requirement will be destroyed, erased or rendered anonymous in a manner that will prevent improper access.

6. **Accuracy**

CTAC will make efforts to keep the personal information collected as accurate, complete and up-to-date as is necessary, taking into account the purpose(s) for which the information is collected and the interests of the individual.

7. **Safeguards**

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

CTAC will make efforts to protect the personal information collected with appropriate safeguards and security measures:

- (a) Information may only be accessed by approved officials or employees, or by other persons designated as such by CTAC, and only to the extent necessary for the identified purpose(s).
- (b) Personal information will only be disclosed to a third party when:
  - i. reasonable steps are taken to identify the individual requesting the personal information;
  - ii. the individual requesting the information is able to establish his/her right to access the personal information requested; and
  - iii. the proposed use of the personal information requested is consistent with the consent given with respect to the collection, use and/or disclosure of the personal information.
- (c) Personal information may only be stored, modified or deleted by the President or his/her delegate as set out herein.
- (d) Physical safeguards include restricted physical access to CTAC offices and secure storage facilities.
- (e) Technological safeguards include restricted file access, computer passwords, firewalls, and file encryption procedures.

8. **Openness**

CTAC shall make readily available to individuals specific information about its policies and practices relating to the management of personal information. Any requests or enquiries about this policy can be directed to the CTAC President.

8. **Individual Access**

Any individual that has provided personal information to CTAC shall have access to that personal information collected, used or disclosed by or on behalf of CTAC. An individual may review, amend or update the personal information collected about him/her.

If CTAC refuses access to an individual to their personal information collected, CTAC will provide to the individual the reason(s) for the refusal and any recourse available.

Where possible, a response to a request for access to personal information by an individual will be made within 30 days of the request.

CTAC will make every effort to provide access of any individual to his/her personal information at minimal or no cost. If a cost is anticipated to provide the information requested, CTAC will advise of the cost prior to disclosing the information.

10. **Challenging Compliance**

An individual shall be able to address a challenge concerning compliance with the above principles to the President or his/her delegate as set out herein for the Association's compliance.

CTAC will investigate and respond to all concerns about any aspect of the collection, use and disclosure of personal information, in a timely manner. Where necessary, an individual will be advised of available avenues of complaint, including the Office of the Privacy Commissioner of Canada.

CTAC will take appropriate measures to correct any inaccurate personal information that is identified or to modify policies or procedures where necessary.

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