

## SPORT FOR LIFE SOCIETY POLICY

<b>TITLE: PRIVACY AND SENSITIVE INFORMATION</b>	
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### 1. PURPOSE

- 1.1. Sport for Life Society is committed to protecting the privacy and ensuring the security of the information provided. Sport for Life Society will not sell, rent, lease or disclose customer information to third parties unless required by law or unless consent to such a disclosure is provided.
- 1.2. Sport for Life Society is committed to a safe, welcoming, and inclusive environment. Information obtained related to self-disclosure of identity will be used in an anonymous, aggregated reporting format and will protect the individual from any bias that such disclosure can lead to.
- 1.3. Privacy of personal information is governed by the Personal Information Protection and Electronics Documents Act ("PIPEDA"). This policy describes the way that Sport for Life Society collects, uses, safeguards, discloses and disposes of personal information, and states Sport for Life Society's commitment to collecting, using and disclosing personal information responsibly. This policy is based on the standards required by PIPEDA and Sport for Life Society's interpretation of these responsibilities.
- 1.4. The Privacy and Sensitive Information policy is utilized on Sport for Life websites, Campus, and embedded within the PLAYBuilder Terms of Use statement.

### 2. DEFINITIONS

- 2.1. "Act" – Personal Information Protection and Electronic Documents Act ("PIPEDA")
- 2.2. "Personal Information" – any identifying information about an individual including information that relates to their personal characteristics including, **but not limited to**, gender, date of birth, age, income, home address or phone number, ethnic background, family status, health history and health conditions, National Coach Certification Program (NCCP) number, education, resumes, fitness results, credit card or banking information, athlete history, birth certificate, performance results, certifications, awards, height, weight, uniform size, shoe size, feedback from coaches and trainers, video footage, photographs, banking information, social insurance number, criminal records check, reference checks, beneficiaries, passport numbers, frequent flyer numbers, and discipline results. Personal information, however, does not include business information (e.g. an individual's business address and telephone), which is not protected by PIPEDA.

- 2.3. "Sport for Life Representative" – Any individual employed by or engaged in activities on behalf of Sport for Life Society, including employees, contractors, volunteers, researchers, Directors of the Board, Members, committee members, and administrators.

### **3. COLLECTION AND CONSENT OF PERSONAL INFORMATION**

- 3.1. When you engage in activities on Sport for Life Society's website(s) and/or various platforms, a Sport for Life Representative may ask you to provide Sport for Life Society with personal information.

By choosing to enter and submit the requested personal information when prompted, you are consenting to Sport for Life's collection, use, and disclosure of such personal information for the purposes of providing the services to you as outlined herein.

- 3.2. Any time you are on our website, it uses cookies. A cookie is a small piece of information that is sent to a user's computer when they access a website. The Sport for Life Society utilizes a session cookie which is stored temporarily in a user's computer's memory and allows one to remain logged in while using the website – i.e., a user is not required to continuously log in as one navigates the pages on the website because these cookies are used. A session cookie is destroyed as soon as a user closes the browser.
- 3.3. Sport for Life Society uses Google Analytics to track and report our sites' engagement. For more information about Google Analytics, its privacy and terms, including how to opt-out from having your information collected through Google Analytics, visit <https://policies.google.com/technologies/partner-sites?hl=en-CA>.
- 3.4. You have the right to withdraw consent at any time by providing reasonable notice to the Sport for Life Representative at [info@sportforlife.ca](mailto:info@sportforlife.ca). If a request to withdraw consent requires that Sport for Life delete an individual's registration information, Sport for Life will no longer be able to provide the communication for which an individual has subscribed. Cancellation will be subject to the terms and conditions of the registration or services provided, as applicable, and subject to the terms of this policy.
- 3.5. Sport for Life Society only collects the information that is necessary for the purposes outlined in this policy.

### **4. PRINCIPLES**

- 4.1. Sport for Life Society's Privacy and Sensitive Information Policy is designed to comply with applicable privacy legislation in Canada. It incorporates the following principles:
  - i. Accountability
  - ii. *Identifying Purpose* means that Sport for Life Society must clearly identify the purposes for which personal information is collected, either before or at the time of collection.
  - iii. Consent
  - iv. *Limiting Collection* means that Sport for Life Society will only collect as much information as is required for the intended purposes of said collection.

- v. Limiting Use, Disclosure and Retention
- vi. Accuracy of Personal Information
- vii. Safeguarding Personal Information
- viii. Openness
- ix. Access to Personal Information
- x. Challenging Compliance
- xi. Prudent Information Retention

4.2 If changes to the policy are required, those changes will be provided in writing through updates and communicated according to Section 11 of this policy.

4.5. It is Sport for Life Society's intent that participants will always know what information it collects, how Sport for Life Society uses it and how Sport for Life Society protects it.

4.6. When personal information that has been collected is to be used for a purpose not previously identified, the new purpose will be identified to the specific participant or to the group of which that participant is a member prior to use and consent sought for that use.

## **5. HOW SPORT FOR LIFE SOCIETY USES PERSONAL INFORMATION**

5.1. Any personal contact information collected will be used only by Sport for Life Representatives to communicate with those who provided it in the form of newsletters and notices if Sport for Life Society has been given permission to do so. Sport for Life Representatives use personal information and/or e-mail addresses for internal purposes only and do not sell, lease or rent information to third parties. This policy outlines how Sport for Life Representatives will treat the personal information in order to comply with the Act.

5.2. Personal information is shared with external service providers only to the extent required for the provision of such services. Furthermore, Sport for Life Society does not sell personal information to any third-party organizations. External service providers are required to keep any information shared confidentially, use it only for the purpose requested, and destroy it when it is no longer required.

5.3. Sport for Life Society also collects personal information for the purposes of tracking trends and reporting. The information that is collected is collated in an anonymous reporting format and individuals are not matched to their identifying information in this reporting. Additionally, Sport for Life Society will take precautions to protect individuals from bias that such disclosure can lead to. It is important to understand that asking a person to self-declare their culture, ancestry, gender, or ability does not violate any human rights codes, provided it is made clear that the choice to declare is completely voluntary.

## **6. SPORT FOR LIFE SOCIETY WEBSITE AND E-NEWSLETTERS**

6.1. Providing personal information for the purpose of receiving e-newsletters or accessing specific sections of the Sport for Life Society website will be optional and required only to engage in certain activities. Additional personal information requested when

engaging in other activities on Sport for Life Society website(s) and platforms will enable Sport for Life Society to better understand users and continue to provide improved services.

- 6.2. Sport for Life Society uses Constant Contact<sup>®</sup> to communicate relevant information with its subscribers. Sport for Life Society is in compliance with the Canadian Anti-Spam Legislation (CASL).
  - i. Subscribers are encouraged to update their personal information as changes occur to enable continued communication from the Sport for Life Society. To update personal information, contact [info@sportforlife.ca](mailto:info@sportforlife.ca).

## **7. SPORT FOR LIFE SOCIETY E-COMMERCE**

### **7.1. SQUARE**

- i. Sport for Life Society's online store is managed and operated by Square Canada, Inc. Square Canada, Inc. provides Sport for Life Society with an online e-commerce platform to sell its products and services.
- ii. Personal data is stored through Square Canada, Inc.'s data storage, databases and the general Square Canada, Inc. application, on a secure server behind a firewall.

### **7.2. EVENTBRITE**

- i. Sport for Life Society's online ticketing and registration platform is managed and operated by Eventbrite, Inc., and is responsible for adopting its own Privacy and Sensitive Information policy. Eventbrite, Inc. provides Sport for Life Society with an online ticketing and registration platform that sells event tickets.
- ii. Personal data is stored through Eventbrite, Inc.'s data storage, databases and the general Eventbrite, Inc. application, on a secure server behind a firewall.

### **7.3. CAMPUS**

- i. Sport for Life Campus is managed by Momentum IT Group and follows the Sport for Life's Privacy and Sensitive Information Policy.
- ii. Payment information is managed and operated through Stripe, Inc.

### **7.4. PAYMENTS**

- i. Direct payment information processed by Square Canada, Inc., Eventbrite, Inc., Stripe, Inc., Interac e-Transfer, and Intuit Inc., is encrypted and stored through the Payment Card Industry Data Security Standard (PCI-DSS). Purchase transaction data is stored only as long as is necessary to complete a purchase transaction. After that is complete, the information is deleted.
- ii. All direct payment gateways adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover.

### **7.5. DISCLOSURE**

- i. Sport for Life Society may disclose your personal information if we are required by law to do so or if an individual violates Sport for Life Society's Terms of Service.

## **8. SECURITY OF YOUR PERSONAL INFORMATION**

- 8.1. Sport for Life Representatives take the protection of the personal information very seriously. Internal data is shared through secured transmissions and maintained in secured databases.
- 8.2. Sport for Life Society may hire certain outside contractors to perform services or functions (such as web development and graphic design). These companies will only be provided an individual's personal information that is needed to complete the desired service. These companies are not permitted to use personal information for any other purpose and are obligated to keep personal information confidential.

## **9. PRIVACY ISSUES AND CONCERNS & ALTERING OR CORRECTING INFORMATION**

- 9.1. At any time, an individual may review, alter or remove any personal information, including the permitted uses of personal information, by contacting Sport for Life Society at:

Sport for Life Society  
c/o Saanich Commonwealth Place  
100-4636 Elk Lake Drive  
Victoria, British Columbia  
V8Z 5M1

Any questions or concerns regarding the Privacy and Sensitive Information Policy, as well as requests to withdraw consent to the provision of personal information, should be sent to [info@sportforlife.ca](mailto:info@sportforlife.ca).

## **10. REVIEW AND APPROVAL**

- 10.1. The Sport for Life Society's Board of Directors and CEO shall review this Privacy and Sensitive Information Policy every two years at a minimum.
- 10.2. The Privacy and Sensitive Information Policy and any amendments to it require approval by the Board of Directors prior to its coming into force.

## **11. COMMUNICATION OF THE POLICY**

- 11.1. The Privacy and Sensitive Information Policy will be posted to the public on the Sport for Life Society's website(s).