

# Lawn Bowls Association of Alberta

## Protection of Personal Information Policy

### Policy Statement

The Lawn Bowls Association of Alberta (LBAA) is committed to safeguarding the personal information entrusted to us by our members.

### Background

Privacy of personal information is governed by the Personal Information Protection and Electronics Documents Act ("PIPEDA"). This policy describes the way that LBAA collects, uses, safeguards, discloses and disposes of personal information, and states LBAA's commitment to collecting, using and disclosing personal information responsibly. This policy is based on the standards required by PIPEDA, and LBAA's interpretation of these responsibilities.

### Purpose

The purpose of this policy is to govern the collection, use and disclosure of personal information in the course of commercial activities in a manner that recognizes the right to privacy of individuals with respect to their personal information and the need of LBAA to collect, use or disclose personal information.

### Definitions

**Personal information:** any information about an identifiable individual including information that relates to their personal characteristics including, but not limited to, gender, age, income, home address or phone number, ethnic background, family status, health history and health conditions.

**Representatives:** Directors, officers, volunteers, coaches, athletes, officials, and members of LBAA.

**Stake holders:** organizations which fund the LBAA or are connected by membership.

**The Act:** Personal information Protection and Electronic Documents Act (PIPEDA).

**Consent:** may be written or implied. In determining the form of consent to use, LBAA will take into account the sensitivity of the information, as well as the individual's reasonable expectations.

**Use of Personal information:** is what the LBAA will do with the information

**Disclosure of Personal Information:** who is allowed to be given the personal information stored with the LBAA.

**Commercial Activity:** any particular transaction, act or conduct that is of a commercial character.

**Access:** is who can see or alter information held with the LBAA.

**Input Officer:** a person designated by the member club to have access to the specific club member information to input and/or correct individual affiliated member information.

## **1. Collection of personal information**

- a. Personal information is collected from application for membership forms sent in to the LBAA office by member clubs and
- b. Registration of members to compete in Lawn Bowls competitions.

## **2. Consent for the collection, use or disclosure of personal information**

- a. LBAA will obtain consent by lawful means from individuals at the time of collection and prior to the use or disclosure of this information. LBAA may collect personal information without consent where reasonable to do so and where allowable by law.
- b. Consent to collect, use and disclose personal information is implied when an application form for membership in a member club is completed. By providing personal information to LBAA, individuals are consenting to the use of the information for the purposes identified in this policy.
- c. In determining the form of consent to use, LBAA will take into account the sensitivity of the information, as well as the individual's reasonable expectations.

## **3. Withdrawal or variation of personal information**

An individual may withdraw consent in writing, to the collection, use or disclosure of personal information at any time, subject to legal or contractual restrictions. LBAA will inform the individual of the implications of such withdrawal.

Individuals who wish to withdraw or vary information gathered by LBAA may do so using the correction of personal information section of the policy.

## **4. Accuracy of personal information**

Accuracy of information held by LBAA may be checked by a verified Input Officer of the member clubs.

## **5. Access to personal information**

Access to personal information held by LBAA is limited to:

- a. staff and contactors of LBAA, in fulfilling their duties;
- b. officers of LBAA board, through the Executive Director in fulfilling their duties; and
- c. the verified Input Officer of the individual's club.

## **6. Correction of personal information**

- a. To correct personal information maintained by LBAA a verified Input Officer of the member club must correct information online at the LBAA website.
- b. If incorrect information is discovered by the Executive Director adjustment to the personal information will be made and LBAA will advise the person whose information has been changed and what the changes were.

## **7. Protection of personal information**

- a. LBAA will protect personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure, copying, modification, destruction or disposal.

- b. Methods of protection and safeguards include, but are not limited to, locked filing cabinets, restricted access to offices, need-to-know access and technological measures including the use of passwords, encryption, and firewalls.
- c. Employees will be made aware of the importance of maintaining personal information confidential and may be required to sign confidentiality agreements.
- d. Codes and passwords used to protect personal information will remain confidential and copies of these will be retained in a secure place by the Privacy Officer.

## **8. Retention of personal information**

Personal information will be retained for one year after collection and then archived. Archived material will remain secure until the LBAA Board of Directors instructs the Executive Director to destroy the information. Paper documents will be destroyed by shredding and electronic records will be permanently deleted if not applicable to membership archived membership lists.

## **9. Use of personal information**

- a. For grant reporting purposes the LBAA submit and maintain membership lists that include name, gender and address. LBAA also report numbers of members in categories of coaches, officials, leaders and those with disabilities;
- b. Categories of ages are used for different reports and surveys therefore raw data is needed to extrapolate these;
- c. Birthdates are needed for bowlers competing in Bowls Canada Boulingrin juniors, under 25 championships and for players over sixty playing in senior events as well as provincial events leading to those championships;
- d. Individual information is used to report to Stake holders the participation levels of members ie athletes, none athlete, coach, umpires, draw masters, years of involvement and those in leadership roles;
- e. To receive communications from LBAA in regards to E-news, newsletters, programs, events and activities;
- f. Database entry to the National Coaching Certification Program Locker to maintain accurate records of coaches and their completion of courses;
- g. Database entry to maintain accurate records of officiating certification and qualifications;
- h. Determination of eligibility, gender, age group for appropriate level of competition;
- i. In case of a medical emergency;
- j. Athlete registration, outfitting uniforms, and various components of athlete and team selection;
- k. Canadian Centre for Ethics in Sport inquiries for the purposes of out-of competition drug testing;
- l. Determination of membership demographics and program wants and needs.

## **10. Consent of Individuals**

LBAA will seek consent from individuals for posting photographs where they are identified and when personal information is requested for commercial purposes not previously identified.

Consent will not be obtained for the following:

- i. If LBAA has reasonable grounds to believe the information could be useful when investigating a contravention of a federal, provincial or foreign law and the information is used for that investigation;
- ii. For an emergency that threatens an individual's life, health or security;

- iii. For statistical or scholarly study or research;
- iv. If it is publicly available as specified in the Act;
- v. If the use is clearly in the individual's interest and consent is not available in a timely way; or
- vi. If knowledge and consent would compromise the availability or accuracy of the information and collection was required to investigate a breach of an agreement or contravention of a federal or provincial law.

#### **11. Disclosure of personal information**

LBAA may disclose personal information without the individual's knowledge or consent only:

- a. To a lawyer representing LBAA;
- b. To collect a debt the individual owes to LBAA;
- c. To comply with a subpoena, a warrant or an order made by a court or other body with appropriate jurisdiction;
- d. To a government institution that has requested the information, identified its lawful authority and indicated that disclosure is for the purpose of enforcing, carrying out an investigation, or gathering intelligence relating to any federal, provincial or foreign law; or that suspects that the information relates to national security or the conduct of international affairs; or is for the purpose of administering any federal or provincial law;
- e. To an investigative body named in the Act or government institution on LBAA's initiative when LBAA believes the information concerns a breach of an agreement, or a contravention of a federal, provincial, or foreign law, or suspects the information relates to national security or the conduct of international affairs;
- f. To an investigative body for the purposes related to the investigation of a breach of an agreement or a contravention of a federal or provincial law;
- g. In an emergency threatening an individual's life, health, or security (LBAA must inform the individual of the disclosure);
- h. For statistical, scholarly study or research, summary data will be disclosed;
- i. To an archival institution;
- j. 20 years after the individual's death or 100 years after the record was created;
- k. If it is publicly available as specified in the regulations; or
- l. If otherwise required by law.

#### **12. Privacy Officer** will be the Executive Director of the LBAA and will:

- a. Implement procedures to protect personal information;
- b. Maintain security codes and passwords in a safe place;
- c. Establish procedures to receive and respond to complaints and inquiries;
- d. Record all persons having access to personal information;
- e. Ensure any third party providers abide by this policy; and
- f. Train and communicate to staff and contractors information about LBAA's policies and practices.

#### **13. Security Audit**

When directed to by the Board of Directors a board member will instigate a privacy audit to ensure the policy on Protection of Personal Information is followed.

#### **14. Security breach**

In the event that the LBAA becomes aware of a security breach relating to the personal information collected, used, disclosed or stored the LBAA will immediately notify the member clubs of the breach.

#### **15. Additional Obligations**

In addition to fulfilling all requirements of the Act, LBAA and its Representatives will also fulfill the additional requirements of this Policy:

Representatives of LBAA will not,

- a) Disclose personal information to a third party during any business or other transaction unless such business, transaction or other interest is properly consented to in accordance with this Policy;
- b) Knowingly place themselves in a position where they are under obligation to any organization to disclose personal information;
- c) In the performance of their official duties, disclose personal information to family members, friends or colleagues, or to organizations in which their family members, friends or colleagues have an interest;
- d) Derive personal benefit from personal information that they have acquired during the course of fulfilling their duties with LBAA; and
- e) Accept any gift or favor that could be construed as being given in anticipation of, or in recognition for, the disclosure of personal information.