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| Policy Title:  | Privacy Policy     |
| Approval Authority:  | Board of Directors |
| Adopted:   | 2004               |
| Current Version Approved:  | December 2019      |
| <p>This Policy has been prepared by Ontario Artistic Swimming (OAS) and is applicable to OAS and its Members. This document cannot be modified by an OAS Member without consultation with and approval by OAS.</p> |                    |

## Definitions

1. The following terms have these meanings in this Policy:
  - a. *“Activity”* – All business and activities of the Organization;
  - b. *“CAS”* – Canada Artistic Swimming;
  - c. *“Coach”* – Any person who instructs figures or routines on a regular basis and includes Instructor, which is a specific level of coach who teaches the AquaGO! or other recreational programming;
  - d. *“Including”* – Including but not limited to;
  - e. *“Individuals”* – Any Organization or individual that has fulfilled the requirements of registration as required by OAS as well as all individuals engaged in Activity with OAS or its Members;
  - f. *“Member”* – Any Competitive, Recreational, Scholastic, University artistic swimming club or AquaGO! or Trillium awards program provider registered with OAS;
  - g. *“Minor”* – A person under the age of 18 years;
  - h. *“Officials”* – All judges including practice judges, referees and scorers;
  - i. *“OAS”* – Ontario Artistic Swimming;
  - j. *“Organization”* – The organization to which the Policy applies and includes OAS and its Members;
  - k. *“Parents”* – Parents or guardians;
  - l. *“Person in Leadership”* – The Executive Director of OAS or President of an OAS Member;

- m. "PTSO" – A Provincial or Territorial Sport Organization that is responsible for the management of artistic swimming within its provincial or territorial boundaries; and
- n. "Vulnerable person" – A person who, because of age, disability, or other circumstances, whether temporary or permanent is in a position of dependence on others or is otherwise at a greater risk than the general population of being harmed by a person in a position of authority or trust relative to them including minors and people with physical, developmental, or other disabilities.

## Purpose

- 2. OAS is committed to keeping your personal information confidential and secure and has developed this Privacy Policy as part of this commitment. Please take the time to familiarize yourself with this Privacy Policy as it sets out what type of information is collected, how this information is used, and with whom the information is shared. We also recommend that you review this document periodically as it may be altered or updated from time to time.
- 3. OAS has taken a policy decision to align its privacy program with the ten privacy principles set out in the Canadian Standards Association (CSA) Model Code for the Protection of Personal Information.<sup>1</sup>

## Application

- 1. This Policy applies to all Individuals.
- 2. This Policy applies at all times, wherever an Activity takes place, which includes the Organization's offices as well as external locations in Canada and abroad.

## Personal information

- 3. OAS and its Members will only collect personal information to achieve the highest standard of organizing and programming in the sport of artistic swimming.
- 4. OAS and its Members may collect personal information from you and about you such as:
  - a. CAS number;

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<sup>1</sup> OAS and its Members are also governed by the *Personal Information Protection and Electronic Documents Act* in matters involving the collection, use and disclosure of personal information during commercial activities, such as when advertising space is sold in event programs.

- b. Name and contact information, including telephone number, residential address and email address;
- c. Emergency contact information;
- d. Athlete information and history, including date of birth, citizenship, competitor levels, physical evaluation, feedback from coaches, and scores and competition results;
- e. Athlete medical information including Ontario Health Insurance Plan (“OHIP”) number, medical, psychological and nutritional evaluations and past medical history including any Incident Reports and Bye Requests;
- f. Passport number;
- g. Credit card number or other banking information;
- h. Photographs, video footage and recorded comments;
- i. Employee, coach and volunteer information including name and contact information, Social Insurance Number, banking information, coach eligibility information such as National Coaching Certification Program (“NCCP”) number and level, official eligibility information such as judge or referee level, and resume information including experience and qualifications; and
- j. Police record checks and other background checks and personal reference information, as required by the CAS *Screening Policy*.

## Use and disclosure

5. OAS and its Members may use your personal information for the following purposes:
    - a. To communicate the Organization’s programs, events and activities;
    - b. To provide you with news, event information and opportunities from CAS, OAS and OAS Members;
    - c. To communicate within and between Members and Individuals;
    - d. To register Members and other registrants and to collect any fees associated with registration
    - e. For record-keeping including posting results;
    - f. To determine eligibility and qualifications of coaches;
    - g. To determine eligibility and qualifications of officials;
    - h. To determine athlete eligibility, age category and appropriate level of competition;
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- i. For use in the case of medical emergencies;
  - k. For the safety of our athletes and to identify adverse trends or specific issues that require remedial action;
  - l. To ensure insurance compliance;
  - m. To process registration fees and for other payment-related purposes such as registration at workshops, travel administration and to purchase equipment or uniforms;
  - n. To process sponsorships and to engage in sponsor recognition activities;
  - o. To report to sponsors, partners, funders and donors;
  - p. For training, educational and promotional purposes;
  - q. To process payroll, source deductions, insurance and other benefits for our employees, athletes, coaches and volunteers; and
  - r. For our internal purposes, including administration and to comply with legal and regulatory requirements.
6. We may disclose your personal information, to the extent necessary, to other OAS Members and registrants, volunteers such as meet managers and officials, CAS, other PTSOs, the Coaches Association of Ontario, Coaching Association of Canada and other organizations, volunteers and programmers who require it to allow administration and continued safe participation within the sport. We may also disclose your personal information to these organizations to allow communication with and between athletes, coaches, officials, board members, et al., and for the promotion of the sport more generally.
7. We may use third party service providers to process or handle personal information on our behalf and to assist us with various services such as event photography, printing and marketing. We do not use sell, rent, trade or otherwise disclose any of your personal information to any third parties, except as described in this Privacy Policy or as permitted or required by law.

## Consent

8. You may give express consent in writing, orally or electronically. You can also imply consent through action or inaction. For example:
- a. By completing and signing a registration form or other OAS or OAS Member materials;

- b. Orally, when personal information is provided in person or over the telephone;
  - c. Electronically, when personal information is provided by email or through social media sites such as Facebook and Twitter; or
  - d. By voluntarily disclosing personal information to OAS or an OAS Member, coach, official, volunteer, employee, or board member.
9. Before deciding what form of consent is appropriate, OAS or the OAS Member, as appropriate, will consider the type of personal information it needs, the reason for its use, as well as the Individual's reasonable expectations. OAS or the OAS Member will generally seek express consent when the information is likely to be considered sensitive.
10. You may also give consent through an authorized representative, such as a parent. This is necessary for minors or other vulnerable Persons. For Individuals aged 13, 14 and 15, consent will typically be obtained from the teenager, however a parent will also be asked to provide consent prior to the use or disclosure of any sensitive personal information.

## Safeguards

11. OAS and its Members take steps to ensure that coaches, volunteers, employees and board members are aware of the importance of maintaining the security and confidentiality of any personal information in our control. Reasonable physical and procedural safeguards have been put in place designed to protect this information.

## Your choices

12. You may access and update your personal information at any time. You may also tell us at any time to stop using information about you by contacting a Person in Leadership (subject to legal and contractual restrictions and reasonable notice). OAS or the OAS Member will comply with your request as quickly as possible but there may be certain uses of personal information that the Organization may not be able to stop immediately.

## Communication

13. OAS and OAS Members will ensure that this Policy is well publicized, including on Organization websites.
14. OAS and OAS Members will ensure that this Policy is communicated to those who will be responsible for upholding it as well as those who will be responsible for its implementation.

## Review

15. OAS will conduct a review of this Policy every four (4) years or as decided by the Executive Director or OAS Board.