



## Purpose

1. Privacy of personal information is governed by the *Personal Information Protection Act* (“PIPA”). This information provided describes the way that Synchro Alberta collects, uses, retains, safeguards, discloses and disposes of personal information, and states Synchro Alberta’s commitment to collecting, using and disclosing personal information responsibly. This information is based on the standards required by PIPA and Synchro Alberta’s interpretation of these responsibilities.
2. A copy of Synchro Alberta’s Policy is provided to any member on request to Synchro Alberta.

## Background

3. Our organization, Synchro Alberta, is the governing body for the sport of synchronised swimming in Alberta, and provides these services to members and the public:
  - a) Synchronized swimming competitions within Alberta;
  - b) Regulation and officiating of the sport of synchronized swimming within Alberta;
  - c) Development and accreditation of coaches;
  - d) Support and development of athletes and teams;
  - e) Fair and equal access to participate in competition, coaching and officiating;
  - f) Leadership opportunities for athletes to develop and grow; and
  - g) Affiliation with other organizations with a view to the promotion of synchronized swimming;

## Personal Information

4. Personal information is information about an identifiable individual. Personal information includes information that relates to their personal characteristics (e.g., gender, age, income, home address or phone number, ethnic background, family status), their health (e.g., health history, health conditions, health services received by them) or their activities and views (e.g., religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information, however, does not include business or employee information (e.g., an individual’s business address and telephone number), which is not protected by privacy legislation.

## Accountability

5. Jennifer Luzia is the Privacy Officer and is responsible for the monitoring of information collected and data security, and ensuring that all staff receives appropriate training on privacy issues and their responsibilities. The Privacy Officer also handles personal information access requests and complaints. The Privacy Officer may be contacted at the following address:

Synchro Alberta  
11759 Groat Road  
Edmonton, Alberta. T5M 3K6  
Tel. (780) 415 1789  
Fax (780) 415-0056  
Jennifer Luzia - [jluzia@synchroalberta.com](mailto:jluzia@synchroalberta.com)

## Purpose

6. Personal information will only be collected by Synchrono Alberta to meet and maintain the highest standard of organizing and programming the sport of synchronized swimming. Synchrono Alberta collects personal information from prospective members, coaches, referees, participants, managers and volunteers for purposes that may include, but are not limited to, the following:
  - a) Name, address, phone number, cell phone number, first language, fax number and e-mail address for the purpose of receiving information from Synchrono Alberta.
  - b) Nationality for statistics as required by Sport Canada.
  - c) NCCP number, education, resumes and experience for database entry at the Coaching Association of Canada to determine level of certification and coaching qualifications.
  - d) Credit card information for registration at conferences, purchasing equipment, coaching manuals and other resources.
  - e) Date of birth and athlete biography for media releases and to determine appropriate age group.
  - f) Banking information, social insurance number, criminal records check, resume, and beneficiaries for Synchrono Alberta's payroll, company insurance and health plan.
  - g) Personal health information including provincial health card numbers, allergies, emergency contact and past medical history for use in the case of medical emergency.
  - h) Personal health information for individuals with a disability in order to determine eligibility to compete and classification.
  - i) Athlete information including category/level, height, dietary supplements taken, uniform size, shoe size, feedback from coaches and trainers, performance results, biography information and Synchrono Alberta registration number for required registration forms, outfitting uniforms, media relations, publishing results and components of selection.
  - j) Athlete whereabouts information including sport/discipline, training times and venues, training camp dates and locations, travel plans, competition schedule, and disability, if applicable, for Canadian Centre for Ethics in Sport inquiries for the purpose of out-of-competition doping testing.
  - k) Individual measurements for adjusting equipment.
  - l) Body weight, mass and body fat index to monitor physical response to training and to maintain an appropriate weight for competition.
  - m) Marketing information including attitudinal and demographic data on individual members to determine membership demographic structure, and program wants and needs.
  - n) Passport numbers and Aeroplan/frequent flyer number for travel purposes.
  - o) Addresses or e-mail addresses to Synchrono Alberta may receive advertisements from Synchrono Alberta sponsors, an alumni letter, a news-letter and donation requests for the purpose of fundraising.
  - p) Determining eligibility for certain events or activities.
7. If a purpose has not been identified herein, Synchrono Alberta will seek consent from individuals when personal information is used for a purpose not already consented to. This consent will be documented as to when and how it was received.

## Consent

8. Consent is required to be obtained by lawful means from individuals at the time of collection, prior to the use or disclosure of the personal information. If the consent to the collection, use or disclosure was not obtained upon receipt of the information, consent will be obtained prior to the use or disclosure of that information. Synchrono Alberta may collect personal information without consent where reasonable to do so and where permitted by law.
9. By providing personal information to Synchrono Alberta, individuals are consenting to the use of the information for the purposes identified in this paragraph 6.

10. In cases where information is collected prior to January 1, 2004, Synchro Alberta assumes consent to use and, where applicable, disclosure for the purpose for which the information was collected.
11. In determining the form of consent to use, Synchro Alberta will take into account the sensitivity of the information.
12. Synchro Alberta will not, as a condition of a product or service, require an individual to consent to the collection, use or disclosure of information beyond that required to fulfill the specified purpose.
13. An individual may withdraw consent to the collection, use or disclosure of personal information at any time, subject to legal or contractual restrictions, provided the individual gives one week's written notice of such withdrawal to Synchro Alberta. The Privacy Officer will advise the individual of the implications of such withdrawal.

### **Limiting Collection**

14. All personal information will be collected fairly, by lawful means and for the purposes as specified in this policy. Synchro Alberta will not use any form of deception to obtain personal information.

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

15. Personal information will not be used or disclosed by Synchro Alberta for purposes other than those for which it was collected as described herein, except with the consent of the individual or as required by law.
16. Information disclosed to a third party with consent from the individual will be protected by a third party agreement to limit use and disclosure.
17. Personal information will be retained for certain periods of time in accordance with the following:
  - a) Registration data and athlete information will be retained for a period of three years after an individual has left the program in the event that the individual chooses to return to the program;
  - b) Parental/family information will be retained for a period of three years after an individual has left the program in the event that the individual chooses to return to the program;
  - c) Competitive results which includes athlete's names, levels and placements will be retained indefinitely for historical purposes;
  - d) Credit Card information will be destroyed immediately upon completion of a financial transaction.
  - e) Information collected by coaches will be retained for a period of three years after an individual has left the program in the event that the individual chooses to return to the program, and in order to communicate program and conference dates;
  - f) Employee information will be retained for a period of seven years in accordance with Canada Customs and Revenue Agency requirements;
  - g) Personal health information will be immediately destroyed in the event that the individual chooses to leave the program;
  - h) Personal health information of paralympic athletes will be retained for a period of three years after an individual has left the program in the event that the individual chooses to return to the program;
  - i) Coaches and officials certification information will be retained for a period of ten years after an individual has left the program in the event that the individual chooses to return to the program or until such time as the individual indicates they will not be returning to the sport in that capacity;

- j) Marketing information will be immediately destroyed upon compilation and analysis of collected information.
  - k) As otherwise may be stipulated in federal or provincial legislation.
18. Personal information that is used to make a decision about an individual will be maintained for a minimum of one year of time to allow the individual access to the information after the decision has been made.
19. Documents will be destroyed by way of shredding and electronic files will be deleted in their entirety. When hardware is discarded, Synchro Alberta will ensure that the hard drive is physically destroyed.

### **Accuracy**

20. Synchro Alberta will use accurate and up-to-date information as is necessary for the purposes for which it is to be used, to minimize the possibility that inappropriate information may be used to make a decision about an individual.

### **Safeguards**

21. Personal information is protected by security safeguards appropriate to the sensitivity of the information against loss or theft, unauthorized access, disclosure, copying, use or modification.
22. Methods of protection and safeguards include, but are not limited to, locked filing cabinets, restricted access to offices, security clearances, need-to-know access and technological measures including the use of passwords, encryption and firewalls.
23. The following steps will be taken to ensure security:
- a) Paper information is either under supervision or secured in a locked or restricted area.
  - b) Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers.
  - c) Paper information is transmitted through sealed, addressed envelopes or in boxes by reputable courier/delivery companies.
  - d) Electronic information is transmitted either through a direct line or is encrypted.
  - e) The office staff is trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with this policy.
  - f) External consultants and agencies with access to personal information will provide Synchro Alberta with appropriate privacy assurances.

### **Individual Access**

24. Upon written request, and with assistance from Synchro Alberta, an individual may be informed of the existence, use and disclosure of his or her personal information and will be given access to that information. As well, an individual is entitled to be informed of the source of the personal information along with an account of third parties to whom the information has been disclosed.
25. Requested information will be disclosed to the individual within 45 days of receipt of the written request at no cost to the individual, or at nominal costs relating to photocopying expenses, unless there are reasonable grounds to extend the time limit.
26. If personal information is inaccurate or incomplete, it will be amended as required.

27. An individual may be denied access to his or her personal information and provided a written explanation as to why if the information:
- a) is protected by any legal privilege;
  - b) would reveal confidential information that is of a commercial nature;
  - c) was collected for an investigation or legal proceeding;
  - d) might result in that type of information no longer being provided to Synchro Alberta when it is reasonable that that type of information would be provided;
  - e) was collected by a mediator or arbitrator or was created in the conduct of a mediation or arbitration for which the mediator or arbitrator was appointed to act under an agreement, enactment or court; or
  - f) relates to or may be used in the exercise of prosecutorial discretion.
28. An individual will be denied access to his or her personal information and provided a written explanation as to why if the information:
- a) could reasonably be expected to threaten the life or security of another individual;
  - b) would reveal personal information about another individual; or
  - c) would reveal the identity of an individual who has in confidence provided an opinion about another individual and the individual providing the opinion does not consent to disclosure of his or her identity.
29. Upon refusal, Synchro Alberta will inform the individual the reasons for the refusal and the associated provisions of PIPA.

### **Challenging Compliance**

30. An individual may challenge Synchro Alberta's compliance PIPA, by submitting a challenge in writing.
31. Upon receipt of a written complaint, Synchro Alberta will:
- a) Record the date the complaint is received;
  - b) Notify the Privacy Officer who will serve in a neutral, unbiased capacity to resolve the complaint;
  - c) Acknowledge receipt of the complaint by way of telephone conversation and clarify the nature of the complaint within three days of receipt of the complaint;
  - d) Appoint an investigator using Synchro Alberta personnel or an independent investigator, who will have the skills necessary to conduct a fair and impartial investigation, and who will have unfettered access to all files and personnel, within ten days of receipt of the complaint.
  - e) Upon completion of the investigation and within 25 days of receipt of the complaint, the investigator will submit a written report to Synchro Alberta.
  - f) Notify the complainant of the outcome of the investigation and any relevant steps taken to rectify the complaint, including any amendments to policies and procedures, within 30 days of receipt of the complaint.

### **IP Address**

When the user's web browser requests a web page from another computer on the Internet, it automatically gives that computer the address where it should send the information. This address is called the computer's "IP address."

Synchro Alberta does not collect, use or disclose IP Addresses.

### **Cookies**

Cookies are small text files that a Web browser transfers to and from your hard drive for record keeping purposes. Cookies make life easier for you by saving your passwords, purchases, and preferences while you're at our site. The use of cookies is an Internet standard, and you'll find cookies at most major Web sites.

The use of cookies is an industry standard and many major browsers are initially set up to accept them. You can reset your browser to either refuse to accept all cookies or to notify you when you have received a cookie. However, if you refuse to accept cookies, you may not be able to use some of the features available on websites.

Synchro Alberta does not use cookies to identify specific individuals.

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### **Applicable Law**

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