

Sandwich West Turtle Club Privacy Policy

BACKGROUND

Turtle Club is a community organization consisting of adult volunteers, whose primary purpose is the administration of baseball and softball activities for the youth of the town of LaSalle.

Turtle Club programming involves governing amateur baseball/softball Leagues, teams and games including training of coaches, trainers and umpires, determining players eligibility for specific divisions and establishing appropriate rules and regulations for competition within the League.

To maintain the current programs, information is collected by the League, for the purposes of certifying team officials and umpires; registering players; determining if boundary regulations may apply; gauging the success of certain programs in order to improve upon them; facilitating emergency contact; providing educational opportunities and/or career opportunities; researching and facilitating electronic updates/contacts; maintaining a membership list of the League for the purpose of determining membership status and voting eligibility .

PURPOSE OF THIS POLICY

The League has developed this Privacy Policy for implementation beginning January 1, 2004. This Policy describes the way in which the League collects, uses, retains, safeguards, discloses and disposes of the personal information of prospective members, members, and others including players, parents, managers, coaches, umpires, volunteers and employees.

This Policy describes the way that the League will, subject to applicable legal requirements, adhere to all relevant federal and provincial legislative privacy requirements. The Policy follows the 10 Canadian Standards Association (CSA) principles identified in the federal Personal Information Protection and Electronic Documents Act (PIPEDA). The Policy describes each principle and the method of implementing each. The League will strive to meet or exceed federal and provincial legislative requirements and will ensure that it remains current with changing technologies and laws.

The League reserves the right in its sole discretion to make whatever changes to its Privacy Policy it deems necessary and expedient. Any and all such changes will immediately be posted to the League web site (www.turtleclubbaseball.com). A copy of the League Privacy Policy is available on the League website.

1. Accountability

- 1.1. The League shall designate a Privacy Officer for the League who will report to the League President and they are jointly accountable to the League Board of Directors for compliance with this Policy. The Privacy Officer will be responsible for the League's compliance with PIPEDA privacy principles and for responding to access requests, corrections and complaints in accordance with this Policy.
- 1.2. The name(s) of the individual(s) listed as the Privacy Officer(s) for the League and member Associations shall be made available upon request.
- 1.3. The League's Privacy Officer will ensure that the League is accountable for all personal information in its possession including that, which may be transferred to a third party. Third party organizations that handle information on behalf of the League shall be contractually obligated to adhere to the standards of the League Privacy Policy.
- 1.4. The League will implement internal policies, which will facilitate adherence to the Privacy Policies including but not limited to the following:
 - Security measures at all levels designed to protect personal information in its possession.
 - Procedures designed to respond to complaints and/or inquiries
 - Volunteer training in all facets of information management, including awareness of the League's Privacy Policy and subsequent policies and procedures developed in accordance with the Policy.

2. Identifying Purposes

- 2.1. The League shall only collect information necessary to conduct baseball/softball programming and fulfill our membership registration requirement as per the League Constitution and By-Laws. Access to our Privacy Policies and procedures will be readily available. Similarly, the process by which challenges may be made to the League's compliance and/or adherence to the legislation in question shall be readily available.
- 2.2. The League shall collect personal information for the purpose of providing baseball/softball programming, which endeavours to meet the individual needs of each participant (Table1).
- 2.3. The League recognizes that in the sports of baseball and softball by its nature injuries are to a certain extent, inherent in the game. Medical records, medical history and medical forms of the individual may be of assistance in an emergency situation and as such may be requested. While participants are under no obligation whatsoever to supply this information and may refuse to do so without penalty, the League will consider receipt of this information as consent for its subsequent use in an emergency medical situation.

- 2.4. The League will request individual permission for the use of any data collected which is extraneous to that which has been identified below in Table 1, unless said usage is authorized or required by law.
- 2.5. The information will be collected via an oral and/or written (electronic) agreement to allow the individual submitting information an opportunity to opt-out or opt-in to the use of personal information for third parties.
- 2.6. All information is kept for the duration of twelve (12) years or as long as required to fulfill the purposes identified, unless permission is obtained from the member providing the information to hold it for a different length of time.
- 2.7. The League will endeavour to advise potential registration candidates of the purpose for the collection of their data at the time of registration. This information will be made available by reference to the League websites or Constitution. The League will further endeavour to ensure that all collectors of the personal information are familiar with the potential use of the data. Any other purpose of collection will be stated at time of collection.
- 2.8. All data collected by the League shall be maintained in the League office.
- 2.9. The League may also use information about user access to secure areas of the League website. Information you are asked to provide during your use of the League web site may include your name, address, e-mail address, age, sex and will be treated within the same parameters as other personal information collected through other means. It will always remain your choice to provide information in certain fields.

Table 1

Type of Personal Information	Purpose of Collecting
A participant's name, gender, place of residence and date of birth.	To determine that the participant's geographical, division and level of play information are consistent with League regulations.
Historical information concerning past teams played for.	To determine if any transfer regulations apply.
A participant's skill and development level and feedback on programs, honours and awards received.	To measure the success of our programs and maintain governance.
A participant's parents (if applicable); name, address, telephone number(s), email addresses and fax.	To facilitate emergency contact information and to ensure compliance with residency regulations and League membership.
Educational information	To ensure all residency regulations have been adhered to.
E-mail addresses and fax	To facilitate membership communication.
Skill levels, ability, emergency contacts and health concerns	To ensure our activities are carried out in a safe and secure environment.
Resumes/coaching applications	To identify potential future coaches, managers, volunteers or individuals running for League positions.
Registration information	To administer the League. To conduct research studies including but not necessarily limited to baseball demographic type research. To be made available to related organizations, branches, associations, Leagues and/or third party service providers.
Appeal Information	To administer appeals and any related proceedings, and the Rules, Regulations and By-Laws of the League.

3. Consent

- 3.1. The League will use the personal information for the uses specified in section 2.
- 3.2. All members of the League have the ability to consent to the use of their personal information on a yearly basis at registration. A member of the League agrees that the act of registering constitutes implied consent to such use of their personal information by the League.
- 3.3. During registration, members will have the opportunity to choose whether information other than name, address, birth date, and information concerning registration, discipline, and honours and awards received may be kept for a longer period than otherwise mentioned.

- 3.4. If at any time you wish to withdraw your consent to the use of your information for any purposes, you may do so by contacting the League Privacy Officer at any time, subject to legal or contractual restrictions and by providing reasonable written notice. Previous consent will be removed from the League database upon receipt of a written request and that request will be communicated to all Member Partners and their Associations within 10 business days.
- 3.5. The League may collect personal information without consent where reasonable to do so and where permitted by law.

4. Limiting Collection

- 4.1. The League shall only collect personal information in a fair and lawful manner as set forth in this Privacy Policy.
- 4.2. The League shall not indiscriminately collect information. The amount and type of information collected shall be limited to that which is required to fulfill its identified purposes.
- 4.3. The League will not use any form of deception in gaining personal information from its members.

5. Limiting Use, Disclosure and Retention

- 5.1. The League shall limit the use of personal information collected to purposes that are listed in Section 2 (Identifying Purposes) and 3 (Consent) and will not disclose the information for other purposes except as authorized or required by applicable law.
- 5.2. Prior to enlisting the services of third party organizations, the League will contractually commit those parties to treat your personal information in a manner consistent with this Privacy Policy.
- 5.3. The League may disclose your personal information to a government authority that has asserted its lawful authority to obtain the information or where the association has reasonable grounds to believe the information could be useful in the investigation of an unlawful activity, or to comply with a subpoena or warrant or an order made by the court, person, or body with jurisdiction to compel the production of the information or otherwise as authorized or required by applicable law.
- 5.4. The League may at its discretion release personal information for the purposes of collecting debts, which may be owed to the League.
- 5.5. The League shall retain documents concerning registration, performance activities, discipline, events and honours and awards received for specific periods of time dependant upon necessity or destroyed accordingly when it is deemed appropriate. More specifically:
 - 5.5.1. Registration data will be retained for a three-year period after an individual has left the League programs in the event that an individual chooses to return to the League programs after leaving.
 - 5.5.2. Parental/Family information will be maintained for a similar three-year period after a member has left our programs.
- 5.6. Other personal information will be retained by the League for regulated timeframes as requested by legislation governing its operation and/or the information provided, after, which time (unless consent is given to keep information for a longer period) the information will be destroyed in a secure manner.
- 5.7. If there is no legislative requirements to retain other information it will be kept for a minimum of 24 months from the time it was provided.

6. Accuracy

- 6.1. The League shall strive to ensure to the extent that it can, that the information entrusted to it is maintained in an accurate manner. Members will have the ability to view and review data provided on their application for membership at any time through the League database. The League shall attempt to maintain the privacy interests of the individual and attempt to ensure that decisions are not made for or about an individual based on personal information that may be flawed.
- 6.2. The League shall only update information if a request is made in writing.

7. Safeguards

- 7.1. Security safeguards will be implemented to ensure your personal information is protected from theft as well as unauthorized use or access, disclosure, copying, or modification thereof.
- 7.2. All information collected by the League (as per Section 2) will be considered highly sensitive. As such, a high level of security will be practiced at all times.
- 7.3. Methods of protection and safeguards to be employed shall include but in no way be necessarily limited to locked files, offices and storage areas, security clearances and need to know access as well as technological measures such as passwords and encryption.
- 7.4. Information that no longer serves a purpose to the League, will be destroyed in an appropriate manner so as to ensure against unauthorized access.
- 7.5. These measures will be subject to yearly reviews by the League and its Privacy Officer to ensure the best methods possible are being utilized to maximize effectiveness.

8. Openness

- 8.1. The League publicly discloses the methods by which personal information is handled. This information is readily available through its Privacy Policy, on its website or upon request by contacting the League Privacy Officer.
- 8.2. The information available includes:
 - 8.2.1. The name address and phone number of the League Privacy Officer.
 - 8.2.2. The forms to access your information or change your information.
 - 8.2.3. A description of the type of personal information and our general uses thereof (review chart in section 2 for more details).
- 8.3. If any participant shall have a question regarding the personal information collected, the investigation may be initiated to the League Privacy Officer.

9. Individual Access

- 9.1. Upon request by the individual concerned, subject to applicable legislation, the League shall disclose whether or not it actually holds personal information on an individual. The League shall disclose the source of this information when requested and provide an account of third parties to whom the information may have been disclosed.
- 9.2. The League may request sufficient information to confirm your identity before releasing any personal information to you.
- 9.3. Subject to applicable legislation, the League shall endeavour to provide this information within 30 days of receipt of the request for information and only charge nominal fees for the purpose of satisfying its expenses incurred in the supply of requested information. This information shall be in format understandable to you.
- 9.4. A member may challenge the accuracy and completeness of the information through written request and any inaccurate information, which may be so validated, shall be corrected and any third parties shall be notified of the corrections as per Section 3(Consent).

10. Challenging Compliance

- 10.1. The League has established a set of procedures for the resolution of grievances in the administration of its Privacy Policy.
- 10.2. Prospective members and staff may challenge the League's compliance with this Policy by contacting the League President and/or Privacy Officer. Upon receipt of a complaint the League shall make available the complaint procedures, which will be simple and easy to access.
- 10.3. The League shall investigate all complaints received. If the complaint is deemed justified, the League shall take the appropriate steps to ensure that compliance is achieved and will make any necessary changes to its policies to allow for compliance in the future.
- 10.4. All complaints shall be addressed to the League Privacy Officer. League policies and procedures must be adhered to in order to have the challenge dealt with in an appropriate and timely fashion.

Turtle Club Protection of Personal Information Agreement

Team/Organization: _____ Name of Requestor _____
Address: _____ City/Town: _____
Postal Code _____ Phone: _____
eMail Address: _____ Date: _____

Purpose of Disclosure of Turtle Club Member Personal Information:

Name of Third Party receiving information:

Team/Organization: _____ Name of Receiver: _____
Address: _____ City/Town: _____
Postal Code _____ Phone: _____
eMail Address: _____

I hereby acknowledge that I am receiving sensitive personal information collected confidentially from members of the Sandwich West Turtle Club Corporation. This information is being transferred to the said individual/company for a purpose that is in the best interest of, or for conducting normal baseball/softball operations of, the League and it’s members. Any use, transfer or distribution of this information to any other party than the one indicated above or for any other purpose other than that indicated above, is strictly prohibited; and failure to comply with this stipulation is in direct violation of the *Personal Information Protection and Electronic Documents Act (PIPEDA)* and known violation of this policy will be pursued to the full extent of the law. Furthermore, it is understood that the individual/company entrusted with this information will take reasonable steps to protect the information from use or disclosure by unintended parties, and will also render the information useless and illegible once the intended use is complete.

I, having the authority to do so, hereby accept these conditions relating to the receipt of this personal information.

Signature _____ Print Name: _____
Date _____