

# Speed Skating Canada

Policy Title: <b>Privacy Policy</b>	Policy No: ADM 600
Approved: February 2016 Review Date:	Pages: <b>11</b>

## 1. OBJECTIVE

- 1.1. The intent of the Speed Skating Canada Privacy Policy is to help individuals understand how their personal information is managed at Speed Skating Canada.
- 1.2. This Policy is designed to comply with applicable privacy legislation in Canada and to be consistent with the stated values of Speed Skating Canada.

## 2. FIELD OF APPLICATION

- 2.1. This Policy applies to, but is not limited to, all Skaters, Supporters, Honourary Skaters, Honourary Supporters and employees of Speed Skating Canada, and any other individual whose personal information is managed at Speed Skating Canada.
- 2.2. This Policy applies only to personal information collected by Speed Skating Canada during the course of Speed Skating Canada related activities.
- 2.3. Should this Policy not address a specific situation, individuals are expected to contact the Speed Skating Canada Chief Privacy Officer for guidance or clarification.
- 2.4. This Policy may be modified by specific terms in the form of Athlete Agreement entered into between Speed Skating Canada and Skaters.
- 2.5. This Policy may be modified by specific terms in the form of any agreement entered into between a Member or a Club and any Participant.

## 3. DEFINITIONS

- 3.1. Any reference to “By-Laws” is a reference to the Speed Skating Canada By-Laws. The term “by-laws” refers to by-laws in place for any Member or Club.
- 3.2. The terms “Skater”, “Honourary Skater”, “Supporter” and “Honourary Supporter” have the meanings described in the By-Laws. In this Policy, these individuals, together with any other individual whose personal information is managed at Speed Skating Canada are collectively referred to as “Participants.”
- 3.3. The term “Member” has the meaning described in the Speed Skating Canada By-Laws, referring to those 13 provincial and territorial speed skating associations.
- 3.4. This Policy also in places refers to these entities, who are not individuals whose information is subject to this Policy:

- 3.4.1. Partner: An organization with which Speed Skating Canada would work in conjunction in conducting the business of the organization or the management of the sport activities (e.g. Calgary Olympic Oval, International Skating Union, Canadian Olympic Committee).
- 3.4.2. Sponsor: An organization or company with which Speed Skating Canada forms a contractual agreement for financial support or goods for the Teams or programs.
- 3.4.3. Funders: A governmental, quasi-governmental or non-governmental non-profit organization which provides funding for high performance and sport programming.
- 3.4.4. Donors: Individuals, organizations and companies that donate funds or property to Speed Skating Canada.
- 3.4.5. Clubs: An association of Participants with an affiliation to or membership in a Member of Speed Skating Canada.

#### **4. PRINCIPLES**

- 4.1. The Speed Skating Canada Privacy Policy is designed to comply with applicable privacy legislation in Canada. It incorporates the following principles:
  - 4.1.1. Accountability
  - 4.1.2. Identifying Purpose
  - 4.1.3. Consent
  - 4.1.4. Limiting Collection
  - 4.1.5. Limiting Use, Disclosure and Retention
  - 4.1.6. Accuracy of Personal Information
  - 4.1.7. Safeguarding Personal Information
  - 4.1.8. Openness
  - 4.1.9. Access to Personal Information
  - 4.1.10. Challenging Compliance
  - 4.1.11. Prudent Information Retention
- 4.2. If changes to the Policy are required in the future, those changes will be provided in writing through updates to this Privacy Policy and communicated according to Section 8 of this Policy.
- 4.3. It is Speed Skating Canada's intent that Participants will always know what information it collects, how Speed Skating Canada uses it and how Speed Skating Canada protects it.
- 4.4. 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. POLICY STATEMENT

5.1. Speed Skating Canada is committed to taking all reasonable steps to protect the privacy of the personal information of Participants from whom it collects personal information for the conduct of Speed Skating Canada activities.

## 6. PROVISIONS

### 6.1. Accountability

6.1.1. Speed Skating Canada is responsible for maintaining and protecting the personal information under its control. Accountability for this function within the organization is held by:

Chief Privacy Officer  
Speed Skating Canada  
850 Industrial Ave. Unit 17F  
Ottawa, ON K1G 4K2  
613-260-3669  
ssc@speedskating.ca

6.1.2. Subject to further designation, the Chief Privacy Officer of Speed Skating Canada is the Chief Executive Officer,

### 6.2. Identifying Purpose

6.2.1. Speed Skating Canada will in this Policy or otherwise identify to an Participant the purposes for which personal information is collected at or before the time the information is collected.

6.2.2. In addition to any other specified purpose identified at that time, Speed Skating Canada collects personal information for the following purposes:

6.2.2.1. registration of Members as defined in the By-Laws and calculation and collection of any fees or charges associated with that;

6.2.2.2. registration of Participants in Canada including Skaters, Supporters Honourary Skaters an Honourary Supporters, as defined in the By-Laws and the calculation and collection of any fees or charges associated with that;

6.2.2.3. to process registrations for competition or other events or activities affiliated with or sanctioned under Speed Skating Canada, and running reports to capture Participant numbers and activities and provide aggregated (non-identifying) information and reports to Funders, Sponsors, Partners and Donors and to the media and community generally;

6.2.2.4. to appoint a Participant to a team or group of Participants representing Speed Skating Canada or being funded by Speed Skating Canada, Sport Canada or any other funding body working with or providing support to Speed Skating Canada, and for the programs and operations of that team or group of Participants;

6.2.2.5. to enable coaches and other professionals to provide coaching, support and assistance to Participants;

- 6.2.2.6. to manage and develop Speed Skating Canada's business and operations, including but not limited to personnel and employment matters and affairs with Partners, Funders and Sponsors;
  - 6.2.2.7. to determine an Participant's entitlement to Speed Skating Canada's services or that Participant's status with Speed Skating Canada or one of its Members or Clubs;
  - 6.2.2.8. to inform Participants about programs, activities and services Speed Skating Canada or one of its Members or Clubs that are believed to be of potential interest or value to them;
  - 6.2.2.9. to better understand a Participant's interests in Speed Skating Canada's products, activities and services or those of its Members or Clubs;
  - 6.2.2.10. to develop, enhance or improve programs, activities and services to better meet the needs of Participants, Speed Skating Canada, Members and Clubs;
  - 6.2.2.11. to report to Sponsors, Partners, Funders and Donors as may be necessary, in aggregate, non-identifiable terms (excepts as concerns Participants in national teams or groups);
  - 6.2.2.12. to permit Members and Clubs to manage their membership lists and carry out their respective operations and activities in a fashion consistent with this Policy and on a basis that provides for compliance with the principles in this Policy;
  - 6.2.2.13. to meet legal and regulatory requirements;
  - 6.2.2.14. to meet the requirements of prudent information retention practices; and
  - 6.2.2.15. to address specific circumstances that require such information to be collected and used as necessary or as appropriate.
- 6.2.3. Speed Skating Canada collects or may collect the following personal information from individuals during the course of normal activities and for membership management:
- 6.2.3.1. participant number
  - 6.2.3.2. previous Participant (formerly member) number
  - 6.2.3.3. first name
  - 6.2.3.4. middle name
  - 6.2.3.5. last name
  - 6.2.3.6. nickname
  - 6.2.3.7. title or rank
  - 6.2.3.8. function or status as a Participant
  - 6.2.3.9. gender
  - 6.2.3.10. language preference
  - 6.2.3.11. birth date

- 6.2.3.12. address
- 6.2.3.13. phone number(s)
- 6.2.3.14. e-mail address
- 6.2.3.15. mother's name
- 6.2.3.16. father's name
- 6.2.3.17. mother's e-mail
- 6.2.3.18. father's e-mail
- 6.2.3.19. mother's phone number(s)
- 6.2.3.20. father's phone number(s)
- 6.2.3.21. mother's address
- 6.2.3.22. father's address
- 6.2.3.23. legal Guardian's name, email, phone number and address, if other than Mother or Father  
(items 6.2.3.15 to 6.2.3.23 apply on to those Participants who have not yet reached their 18<sup>th</sup> birthday on July 1 of the registration year in the information is collected)
- 6.2.3.24. business contact information
- 6.2.3.25. ethnicity/race (self-identify, optional)
- 6.2.3.26. special needs/disability (self-identify, optional)
- 6.2.3.27. gender identity (self-identify, optional)
- 6.2.3.28. health or medical concerns or circumstances relevant to their activities as a Participant<sup>1</sup>
- 6.2.3.29. Provincial Health Information Number
- 6.2.3.30. for employees of Speed Skating Canada, salary, education, work experience and other typical human resources information;
- 6.2.3.31. for volunteers of Speed Skating Canada, information on training, education, work experience, volunteer experience and qualifications, and information on expenses and reimbursement of those expenses;
- 6.2.3.32. information concerning financial support of a Participant by Speed Skating Canada or by a Member, Club, Donor, Sponsor, Funder or Partner;
- 6.2.3.33. "personal bests" and other results and times, as well as information about training programs, testing results and other typical training information;

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<sup>1</sup> All health or medical information is confidential and will be treated as such. Speed Skating Canada respects that some health or medical matters are particularly sensitive. Participants are encouraged to provide all such information that could be relevant to their activities as a Participant. As and when that is provided to Speed Skating Canada, Participants should specifically identify such information.

6.2.3.34. documents and their information provided to Speed Skating Canada, a Member of a Club, including:

6.2.3.34.1. Code of Conduct Agreement

6.2.3.34.2. Waiver (e.g. Liability Waiver, Photo Release)

6.2.3.34.3. images in photography, audio, film or video

6.2.3.34.4. health and medical disclosure documents

6.2.3.34.5. in limited circumstances where identified as confidential, conflict of interest information

6.2.4. Additional information obtained may include levels of interest for programs, activities, services and topics provided by Speed Skating Canada, a Member or a Club, and transaction activity with Speed Skating Canada.

6.2.5. Credit card information or banking information may be collected and utilized for payment transactions for registration and other financial transactions only. This information will not be stored.

6.2.6. Speed Skating Canada collects and stores information through web servers based in Canada. This information may be used for the purposes identified in this policy. From time to time, and only if and to the extent necessary, personal information is shared through email or web-based means that are transmitted through facilities and servers outside of Canada.

6.2.7. Speed Skating Canada's website ([www.speedskating.ca](http://www.speedskating.ca)) and its online Member Management system (the Database) use cookies. A cookie is a small piece of information that is sent to a user's computer when he or she accesses a Web site. Speed Skating Canada utilizes a session cookie which is stored temporarily in a user's computer's memory and allows him or her 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 his or her browser.

### 6.3. Consent

6.3.1. An Participant's knowledge and consent are required before Speed Skating Canada is allowed to collect, use or disclose his or her personal information.

6.3.2. Where possible, Speed Skating Canada will obtain consent directly from the Participant concerned at the time of collection.

6.3.3. A Participant has the right to withdraw consent at any time by providing reasonable notice to the Speed Skating Canada Chief Privacy Officer. If a request to withdraw consent requires that Speed Skating Canada delete an individual's registration information, Speed Skating Canada will no longer be able to provide the programs, services or products for which an individual has subscribed, and that individual may no longer be able to retain his or her status as a Skater, Supporter, Honourary Skater or Honourary Supporter of Speed Skating Canada, or affiliated with a Member or Club.

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.

- 6.3.4. On the withdrawal of consent by a Participant, Speed Skating Canada will remove historical information (eg. posted results of competitions, photos) only so far as doing so is within its control and only on a best-efforts basis. Some personal information of the Participant will remain in the records of Speed Skating Canada so long as required by the prudent information retention practices of Speed Skating Canada.
- 6.3.5. By registering in or by allowing themselves to be registered in Speed Skating Canada through the Database, or subscribing to any reports or services, by providing personal information to Speed Skating Canada, or otherwise indicating approval, individuals consent to the collection and use of their personal information for the purposes identified in this Privacy Policy. For these purposes, the provision of information to Speed Skating Canada by a Member constitutes consent on behalf of the Participant whose information is provided.
- 6.3.6. By registering as a Participant or allowing themselves to be registered as a Participant with Speed Skating Canada, an individual acknowledges that participating in speed skating activities as a skater, coach, official or in any other capacity is to a very large extent a public matter and consents to photography, videotaping and filming, and the use of that by Speed Skating Canada in the course of its activities.
- 6.3.7. Speed Skating Canada will not require an individual to consent to the collection, use or disclosure of personal information beyond that required to provide products, programs, activities or services of or sanctioned by Speed Skating Canada, its Members or Clubs.
- 6.3.8. Speed Skating Canada may use or disclose personal information without the knowledge or consent of the individual as required by governmental bodies acting with authority, or as authorized or required by applicable legislation or other law.

#### 6.4. Limiting Collection

- 6.4.1. Speed Skating Canada collects only the information that is necessary for the purposes outlined in this Privacy Policy.

#### 6.5. Limiting Use, Disclosure and Retention

- 6.5.1. Speed Skating Canada does not use personal information for purposes other than those for which it was collected, except with an Participant's consent or as required by law.
- 6.5.2. Once personal information is no longer required to fulfill the identified purposes (including prudent information retention practices) or other legal requirements, it will be destroyed, deleted or made anonymous.
- 6.5.3. Speed Skating Canada sometimes uses the services of external firms to assist in communicating with Participants (e.g., surveys and mail distribution) or as a means of providing more effective and efficient services to these Participants (e.g., technology support). External suppliers and contractors are contractually obligated to keep the information confidential,

to use the information only for the purpose requested and to destroy the information when it is no longer required.

- 6.5.4. Personal information is shared with external service providers only to the extent required for the provision of such services. Furthermore, Speed Skating Canada does not sell personal information to a third-party organization. External service providers are required to keep the information confidential, to use the information only for the purpose requested and to destroy the information when it is no longer required.
- 6.5.5. In certain circumstances, Speed Skating Canada allows basic contact information of Participants to be shared amongst staff and volunteers who are Participants under this Policy. Examples of this include providing skater lists for competitions to other participants or sharing contact information amongst members of the Speed Skating Canada administrative networks, Boards of Directors and staff, or committees to facilitate ongoing communication. This Policy requires that such Participants use that information exclusively for carrying out the activities of Speed Skating Canada or a Member or a Club, and not for any other personal or business reason.
- 6.5.6. Personal information is retained only as long as necessary for the fulfillment of the purposes stated in this policy.
- 6.5.7. Personal information collected through the Database will be used by system administrators in Club, Member and Speed Skating Canada to register Skaters, Supporters Honourary Skaters and Honourary Supporters and to process registrations for competition and other activities, to generate reports to funders, to generate statistical reports and to capture Participant numbers.
- 6.5.8. Personal information collected through the Database will be used by Speed Skating Canada and its service-providers to communicate information and news relevant to Participants, including the events and activities of Speed Skating Canada, its Members and clubs, and Partners, Funders and Sponsors.
- 6.5.9. Personal information may be provided to designated staff and Directors of Clubs, Members and Speed Skating Canada as necessary and appropriate, and who agree by this Policy to use it only for the purposes identified in this Privacy Policy or otherwise consented to by the Participant.

#### 6.6. Accuracy of Personal Information

- 6.6.1. Personal information is kept as accurate, complete and up to date as necessary for the purposes for which it is to be used. Participants are encouraged to provide updates to their personal information as changes occur, to enable continued service from Speed Skating Canada.
- 6.6.2. The personal information of Participants registered with Speed Skating Canada can be reviewed and modified either directly on-line or by contacting the Speed Skating Canada web site administrator.

Web Services  
Speed Skating Canada  
850 Industrial Ave. Unit 17F



Ottawa, ON K1G 4K2  
613-260-3669  
[ssc@speedskating.ca](mailto:ssc@speedskating.ca)

6.6.3. For the purposes of 6.6.2, a Participant is not entitled to review information about himself or herself if it constitutes qualitative, assessment or opinion information by Speed Skating Canada, a Member or a Club generated for the purposes of decision-making, including decision-making concerning:

- 6.6.3.1. a Skater's selection to a team or program or a recommendation pertaining to that Skater for funding or other financial support;
- 6.6.3.2. a Participant's election to a board or appointment to a Committee;
- 6.6.3.3. a change in a Participant's official level, or the selection of an official for a particular event or activity; and
- 6.6.3.4. Any sanction considered for a Participant under the By-Laws, a Member's by-laws or Club's by-laws, under any applicable code of conduct or policy concerning conduct, or under any rules of competition.

#### 6.7. Safeguarding Personal Information

6.7.1. Speed Skating Canada will safeguard personal information, whatever its form, by means appropriate to the sensitivity of the information. The safeguards will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. The measures of protection include:

- 6.7.1.1. physical measures, for example, locking filing cabinets and restricted access to offices;
- 6.7.1.2. organizational measures, for example, limiting access to the personal information on a "need-to-know" basis;
- 6.7.1.3. technological measures, for example, the use of passwords and encryption; and
- 6.7.1.4. procedural measures, for example, the shredding of sensitive personal information when applicable.

6.7.2. The Member Management System database will have the following specific security measures implemented to protect an individual's electronic personal information

- 6.7.2.1. all information is stored in a single SQL Server Database residing at the data centre located at Peloton Technologies, under contract to Speed Skating Canada.
- 6.7.2.2. Peloton Technologies' infrastructure providers (the ones that maintain its data centre) are Cirrus 9 (<http://www.cirrus9.net/>) and the database is stored in a High Security Zone that is only accessible by secure VPN connection, and directly from the web servers in the Demilitarized Zone.

- 6.7.2.3. this particular Cirrus9 location is physically secure and located in what was formerly a bank.
- 6.7.2.4. Cirrus9 is 100% Canadian owned and operated
- 6.7.2.5. backups of the database are performed regularly but reside within the High Security Zone.
- 6.7.2.6. from time to time, or upon request, an offsite backup may be initiated for disaster recovery purposes, which offsite backup shall be located in Canada.
- 6.7.2.7. when doing so all information is encrypted and the information will be stored in a location with comparable security.
- 6.7.2.8. more information on the security of individual information collected through the Member Management System database can be found in the privacy policy for the “Peloton My Account” application located at <https://myaccount.peloton-technologies.com/Pages/Policy.aspx>

## 6.8. Openness

- 6.8.1. Speed Skating Canada is committed to being open about its policies and practices with respect to the handling of personal information.
- 6.8.2. the Privacy Policy is available on the Speed Skating Canada Website.
- 6.8.3. if additional information is required, requests for such information may be made to the Chief Privacy Officer.

## 6.9. Access to Personal Information

- 6.9.1. individuals may request a copy of their personal information held at Speed Skating Canada by submitting a written request to the Chief Privacy Officer at the address above.
- 6.9.2. for the purposes of 6.9.1, a Participant is not entitled to review information about himself or herself if it constitutes qualitative, assessment or opinion information by Speed Skating Canada, a Member or a Club generated for the purposes of decision-making, including decision-making concerning:
  - 6.9.2.1. a Skater’s selection to a team or program or a recommendation pertaining to that Skater for funding or other financial support;
  - 6.9.2.2. a Participant’s election to a board or appointment to a Committee;
  - 6.9.2.3. a change in a Participant’s official level, or the selection of an official for a particular event or activity; and
  - 6.9.2.4. any sanction considered for a Participant under the By-Laws, a Member’s by-laws or Club’s by-laws, under any applicable code of conduct or policy concerning conduct, or under any rules of competition.
- 6.9.3. acceptable proof of identification is required before such information is provided.
- 6.9.4. if the information is inaccurate, an individual may request that it be reviewed and, if inaccurate, changed, by contacting the Chief Privacy Officer.

#### 6.10. Challenging Compliance

- 6.10.1. an individual can challenge compliance with the above policy by providing written details of the challenge to the Chief Privacy Officer.

### **7. REVIEW AND APPROVAL**

- 7.1. The Speed Skating Canada Board of Directors and CEO shall review this policy biennially.
- 7.2. This Policy and any amendments to it require approval by the Board of Directors prior to its coming into force.

### **8. COMMUNICATION OF THE POLICY**

- 8.1. The Privacy Policy will posted in the Policies section of the Speed Skating Canada Website, be accessible through the Database.
- 8.2. A copy of the Policy will be distributed to Members and to National Team Representatives, to Committee Chairs, to Executive Staff, to web management staff and to Member administrators.
- 8.3. Access to the Policy will be available through a link in the Database, and shall be part of the orientation and training of anyone being granted any type of administrator privileges in the Database.