

## **OWHA PRIVACY POLICY**

### **BACKGROUND**

The Ontario Women's Hockey Association (OWHA) is the governing body of female hockey in the province of Ontario and operates in cooperation with Hockey Canada.

OWHA Hockey Programming involves governing female hockey teams, programmes, associations, leagues, events and games including selection and training of coaches, trainers and referees, determining player and team eligibility for specific divisions and categories, and establishing appropriate rules and regulations for participation and competition within female hockey. To provide and facilitate programming, information is collected by the OWHA for the purposes of certifying team officials and referees; registering participants; determining if transfer regulations apply; determining if releases apply; determining if permission to skate applies; determining if regulations may apply, monitoring scouting, 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 and/or fax and/or hard copy updates/contacts.

### **PURPOSE OF THIS POLICY**

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

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

The OWHA 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 OWHA web site ([www.owha.on.ca](http://www.owha.on.ca)).

## **1. Accountability**

- 1.1 The OWHA shall designate the President and Executive Director as the Privacy Officer(s) for the OWHA and they are jointly accountable to the Executive Committee for compliance with this Policy. The Privacy Officer(s) will be responsible for the OWHA's compliance with PIPEDA privacy principles and for responding to access requests in accordance with this Policy.
- 1.2 Each of the OWHA teams, and/or OWHA Associations and Leagues shall designate and identify to the OWHA and to its members an individual or individuals as their Privacy Officer(s) and identify an appropriate hierarchy of contact and accountability for information.
- 1.3 The name(s) of the individual(s) listed as the OWHA Privacy Officer(s) shall be made available upon request or by visiting the OWHA website and Handbook. In the case where neither of these individuals are available upon request, a delegate may act on their behalf.
- 1.4 The OWHA's Privacy Officer will ensure that the OWHA is accountable for all personal information in its possession including that which may be transferred to a third party. Third party organizations who handle information on behalf of the OWHA shall be contractually obligated to adhere to the standards of the OWHA Privacy Policy.
- 1.5 The OWHA will implement internal policies which will facilitate adherence to the Privacy Policy 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
  - Staff training in all facets of information management, including awareness of the OWHA's Privacy Policy and subsequent policies and procedures developed in accordance with the Policy.

## **2. Identifying Purposes**

- 2.1 The OWHA shall only collect information necessary to conduct hockey programming. Access to our Privacy Policy and procedures will be readily available. Similarly, the process by which challenges may be made to the OWHA's compliance and/or adherence to the legislation in question shall be readily available.
- 2.2 The OWHA collects personal information for the purpose of providing hockey programming, which endeavours to meet the individual needs of each participant.
- 2.3 The OWHA recognizes that hockey by its nature is a contact sport and 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 OWHA will consider receipt of this information from the player or member or any lawful representative of a player or member or from a hospital or doctor or dentist detailing personal information as consent for its subsequent use in an emergency medical situation.

2.4 The OWHA will request individual permission for the use of any data collected which is extraneous to that which has been identified **below**, unless said usage is authorized by law.

<b>Type of Personal Information</b>	<b>Purpose of Collecting</b>
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 OWHA and Hockey Canada regulations.
Historical information concerning past teams played for.	To determine if any Hockey Canada transfer regulations apply. To determine if a release or permission to skate is required.
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 regulations.
Educational information	To ensure all regulations have been adhered to.
E-mail addresses, phone and fax	To facilitate membership communication.
Skill levels, ability, emergency contacts and health concerns	To support the objective of providing activities in a safe and secure environment.
Resumes	To identify potential future employment candidates.
Registration information	To conduct research studies including but not necessarily limited to hockey demographic type research. Statistics to be made available to related organizations, Branches, associations, leagues and/or third party service providers.
Appeal/Hearing Information	To administer appeals/hearings and any related proceedings, and the Rules, Regulations, Constitution and By Laws and Code of Conduct of the OWHA.
Information for the administration of the OWHA its players members and affiliates for the safety and well being of the players members and affiliates and the efficient administration of female hockey.	To administer the OWHA, and the organizations and players of the OWHA for the benefit and well being of female hockey and the individual participants.

2.5 The information will be collected via an oral and/or written 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 seven 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 OWHA will endeavour through its members 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 OWHA website or Handbook. The OWHA 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 OWHA shall be maintained in the OWHA office. The office is listed on the OWHA web site.
- 2.9 The OWHA may also use information about user access to secure areas of the OWHA website. Information you are asked to provide during your use of the OWHA web site may include your name, address, phone, e-mail address, age, sex and will be treated within the same parameters as other personal information collected by Hockey Canada through other means. It will always remain your choice to provide information in certain fields.

### **3. Consent**

- 3.1 The OWHA will use the personal information for the uses specified in section 2.
- 3.2 All members of the OWHA have the ability to consent to the use of their personal information on a yearly basis. A member of the OWHA agrees that the act of registering constitutes implied consent to such use of their personal information by the OWHA, its Member Teams, their Associations, OWHA Leagues and Hockey Canada.
- 3.3 Beginning with the 2004-2005 season registration, members will have the opportunity to choose whether information other than name, address, phone, 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 OWHA Privacy Officer at any time, subject to legal or contractual restrictions and by providing reasonable written notice. Previous consent will be removed from the OWHA data base upon receipt of a written request and that request will be communicated to the pertinent Team, Association, Program, League and/or individual within 10 business days.
- 3.5 The OWHA may collect personal information without consent where reasonable to do so and where permitted by law.

### **4. Limiting Collection**

- 4.1 The OWHA its Teams, Associations, Programs and Leagues shall only collect personal information in a fair and lawful manner as set forth in this Privacy Policy.
- 4.2 The OWHA 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 OWHA will not use any form of deception in gaining personal information from its members.

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

- 5.1 The OWHA, its Teams, Associations, Programs and Leagues shall limit the use of personal information collected to purposes that are listed in Section 2.2 (Identifying Purposes) and 3.2 (Consent) and will not disclose the information for other purposes except as authorized or required and permitted by applicable law.
- 5.2 Prior to enlisting the services of third party organizations, the OWHA will contractually commit those parties to treat your personal information in a manner consistent with this Privacy Policy.
- 5.3 The OWHA 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 permitted by applicable law.
- 5.4 The OWHA may at its discretion release personal information for the purposes of collecting debts which may be owed to the OWHA.
- 5.5 The OWHA 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:
  - Registration data will be retained for a three year period after an individual has left the OWHA programs in the event that an individual chooses to return to the OWHA programs after leaving.
  - 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 OWHA 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 OWHA 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 OWHA database or equivalent. The OWHA 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 OWHA 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 OWHA (as per 2.2) 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 These measures will be subject to yearly reviews by the OWHA and its Privacy Officer(s) to ensure the best methods possible are being utilized to maximize effectiveness.

## **8. Openness**

- 8.1 The OWHA 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 OWHA Privacy Officer.
- 8.2 The information available includes:
  - The name address and phone number of the OWHA Privacy Officer.
  - The forms (attached) to access your information or change your information.
  - A description of the type of personal information and our general uses thereof (review chart in section 2.2 for more details).
- 8.3 If any participant shall have a question regarding the personal information collected, the investigation may be initiated to the OWHA Privacy Officer, then directly to the OWHA Officers.

## **9. Individual Access**

- 9.1 Upon request by the individual concerned, subject to applicable legislation, the OWHA shall disclose whether or not it actually holds personal information on an individual. The OWHA shall disclose the source of this information when requested and provide an account of third parties to whom the information may have been disclosed. You shall not have access to personal information which would likely reveal personal information about another person or third party unless the information can be severed from the record containing the information about another person or third party or unless that other person or third party specifically consents in writing to the release of her/his or its personal information.
- 9.2 The OWHA may request sufficient information to confirm your identity before releasing your personal information to you.
- 9.3 Subject to applicable legislation, the OWHA 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 provided in an understandable format.

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 3.4 (Consent).

### **Challenging Compliance**

10.1 The OWHA 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 OWHA's compliance with this Policy by contacting the OWHA Executive Director or/and Privacy Officer(s). Upon receipt of a complaint the OWHA shall make available the complaint procedures which will be simple and easy to access.

10.3 The OWHA shall investigate all complaints made to it. If the complaint is deemed justified, the OWHA 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 OWHA Privacy Officer. OWHA policies and procedures must be adhered to in order to have the challenge dealt with in an appropriate and timely fashion.

### **11. Contacting Us**

11.1 If you have any questions about this privacy policy, please contact the OWHA in writing:

Ontario Women's Hockey Association  
Attention: Privacy Officer  
#3 – 5155 Spectrum Way  
Mississauga, Ontario  
**L4W 5A1**