



Rowing Canada Aviron

Online Registration System - Protection of Personal Privacy

Policy Statement

Rowing Canada Aviron (RCA) has developed this Privacy Policy to describe the way that RCA collects, uses, retains, protects, transfers, discloses and disposes of personal information of prospective members, members, staff and volunteers.

Purpose

This Policy describes the way that RCA will, subject to applicable legal requirements, adhere to applicable legislative requirements. The Policy follows the 10 Canadian Standards Association 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 collection of personal information shall be limited to that which is necessary for the purposes identified by RCA.

Policy

1. Accountability

RCA will appoint a staff person (the "Privacy Officer") who shall be responsible for the implementation and monitoring of the RCA Privacy Policy. The Privacy Officer will be responsible for compliance with the privacy principles and shall respond to requests for access to information in accordance with this Policy.

Members shall be able to address all concerns regarding compliance with the policy to the Privacy Officer of RCA.

The RCA designated Privacy Officer is:

Jennifer Parfitt, Manager of Member Services and Club Development
jenparfitt@rowingcanada.org
Phone: 250-220-2579

2. Identifying Purpose

RCA is required to collect information reasonably necessary to conduct RCA programming and services. If the information required by RCA is not provided, the services, programming and opportunities available from RCA may be limited.



Personal information is collected by RCA for the following primary purposes of:

- a) ensuring our athletes train and compete in an age appropriate environment;
- b) establishing athlete eligibility for selection to rowing teams;
- c) establishing pertinent medical records and baseline performance data to assist coaching decisions in a national team competitive or training setting;
- d) reporting non-identifying, demographic participation statistics to funders, sponsors and other authorized 3rd parties;
- e) publishing athletes' names, genders, ages (where required), club affiliations on our web page or in results, news releases and ranking reports; and
- e) making direct contact with members, volunteers and staff as necessary for the operation of the organization.

RCA will request individual permission for the use of any personal information collected which is extraneous to that which has been identified above, unless said usage is authorized and/or required by law.

3. Consent

RCA requests the consent of its members to collect and use personal information primarily for registration and performance purposes. Personal registration information shall include name, address, date of birth, gender, club affiliation, RCA classification (if applicable), aboriginal declaration (if applicable), language preference, whether athlete has a disability, address, e-mail addresses and telephone numbers. Personal performance information may also include medical history, allergies, injury history, current medications and anthropometric data. Personal registration and performance information is entered electronically into electronic databases that seek to maintain accuracy, security and restricted access. Hard copy lists are also kept in a restricted access location at the RCA offices.

The registration database is designed and currently maintained by Peloton Technologies Inc. The web registration web application and database are hosted by Peloton Technologies Inc. The registration site uses an SSL certificate to encrypt all data passing through the internet. HTTPS (Hypertext Transfer Protocol Secure) is used to provide encrypted communication and secure identification for the purposes of this system and payment transactions. Personal information is not accessible by any means to the general public. Each member club's registrar/administrator has access to the database and strictly to information pertaining to its own club members. Each Provincial Rowing Association's registrar/system administrator has access to the database and strictly to information pertaining to its own provincially registered members. Each Special Association's registrar/system administrator has access to the database and strictly to information pertaining to its own provincially registered members.



RCA as the National governing body over rowing in Canada shall have access to personal information of all its registered members. RCA staff access is restricted to persons identified as RCA “Administrators” and information is made available to RCA staff members pursuant to the principles and purposes listed above.

RCA will use the personal information for the uses specified in this Policy. By consenting to provide your information to RCA, you are deemed to consent to our use of the information for the purposes set out above and to the disclosure of the information to other associated organizations for the same purpose.

In addition to using personal information for Rowing Programming purposes, RCA may from time to time wish to use personal information for the purposes of providing promotional opportunities, including by providing the information to International Rowing Associations, Provincial Associations, and Local Clubs.

Provincial Rowing Associations (PRA’s) are subsidiaries of RCA for reporting purposes under this Policy. Because PRAs have a more direct relationship with members, PRA’s shall obtain the consent of members to collect, and disclose to RCA, personal information solely for the purposes identified above.

RCA recognizes that sport by its nature may cause physical injury. We believe medical records, medical history and medical forms of the individual may be of assistance in an emergency situation and therefore we may request them. While RCA members and prospective members are under no obligation whatsoever to supply this information and may refuse to do so without penalty, RCA will consider receipt of this information as consent for its subsequent use in an emergency medical situation.

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 PRA in writing and by contacting the RCA Privacy Officer. RCA will do its best to accommodate your request in a timely fashion without diminishing the services it provides. The impact of your withdrawal on any services will be provided to you upon request.

4. Limiting Collection

The amount and type of information we collect shall be limited to that which is required to fulfill the purposes set out herein. All information will be collected fairly and lawfully within the criteria as set forth in RCA Privacy Policy.

5. Limiting Use, Disclosure and Retention

RCA shall maintain documents for certain periods of time dependent upon necessity. More specifically:

- Personal information is kept by RCA for the duration of a member’s participation in national, provincial or Club programs. When a membership expires, the membership will be registered as “inactive” and will only be re-activated for those members who re-register through their Club. Information will be retained for a period of six years after which it shall be purged entirely from RCA databases. Non-identifying information is retained for demographic, statistical and performance analysis

purposes. Hard copy lists are kept at the RCA national office for a period of no more than two years, after which time they are destroyed.

- RCA may from time to time enlist the services of third party vendors in order to provide or assist in the provision of RCA programs, technical and support services. Prior to enlisting the services of these entities we will contractually commit them to treat personal information consistent with the RCA Privacy Policy.
- RCA 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 permitted by applicable law.
- Certain information may be subject to legislated retention periods either federally or provincially and these will be respected at all times by RCA.

If disclosure is required for a purpose other than as set out in this Policy, RCA will obtain prior consent from the member or their parent/guardian. Signed consent forms are kept on file with RCA and/or clubs until such time as a member wishes to withdraw consent or leaves the organization.

6. Accuracy

RCA shall strive to ensure to the extent it can that the information entrusted to RCA is maintained in an accurate manner.

RCA will provide members with their personal information including that as it appears on the RCA Web Registration database within 30 days of receipt of a written request and ID verification by the Registrar. Members shall be able to review the accuracy and completeness of information and have it amended as appropriate.

7. Safeguards

Security safeguards have been implemented to ensure personal information is protected from unauthorized access, disclosure, copying, use or modification.

8. Openness

RCA publicly discloses the methods by which personal information is handled. This information is readily available through the Privacy Policy, website or upon request by contacting the RCA Privacy Officer.

9. Individual Access

Subject to applicable legislation, upon request by the individual concerned, RCA shall disclose whether or not it actually holds personal information of the concerned individual. RCA may request sufficient information to confirm an individual's identity before releasing or confirming that it holds personal information.



Subject to applicable legislation, RCA shall endeavor to provide this information within 30 days of receipt of the information request and only charge nominal fees for the purpose of off-setting its expenses incurred in supplying the requested information. Any inaccurate information that is brought to our attention shall be corrected by RCA as quickly as possible and any pertinent third parties shall be apprised of the corrections in due course.

Challenging Compliance

RCA has in place procedures for the resolution of concerns in the administration of its policies. Upon receipt of a complaint RCA shall make available the complaint procedures.

Website Privacy Statement:

RCA, through its website host, records visits to the RCA website and logs the following information for statistical purposes: the user's server or proxy address, the date/time/length of visits and the files required. The information is used to analyze our server traffic. No attempt will be made to identify users or their browsing activities except where authorized by law. For example in the event of an investigation, a law enforcement agency may exercise their legal authority to inspect the internet service provider's logs. If you send us an email message we will record your contact details and this information will only be used for the purpose for which you have provided it. We will not use your email for any other purpose and will not disclose it without your consent. When users choose to join a mailing list their details are added to that specific mailing list and used for the stated purpose of that list only.

RCA is not responsible for the privacy practices or the content of the linked web sites and the other pages hosted by RCA on behalf of non-RCA agencies and organizations.

Disclaimer: The material on the RCA website is made available on the understanding that users exercise their own skill and care with respect to its use. Before relying on material in any important matter, users should carefully evaluate the accuracy, completeness and relevance of the information and should obtain appropriate professional advice relevant to their particular circumstances.

Responsibility:

Body	Action
<p>RCA - Privacy Officer: Mrs. Jennifer Parfitt Manager of Membership Services and Club Development</p>	<p>Is the appointed designate for overseeing the data collection process and is ultimately accountable for compliance with this policy.</p>
<p>Rowing Club System Administrators</p>	<p>Where Rowing Clubs are disclosing or transferring personal information to RCA directly on behalf of a member, they shall keep a signed consent form on file for each rower.</p>
<p>Provincial Rowing Association or Special Association</p>	<p>Where the PRA's are disclosing or transferring personal information to RCA directly on behalf of a member, they shall keep a signed consent form on file for each rower.</p>