

## PRIVACY POLICY

Updated September 15, 2014

### POLICY STATEMENT

The Canadian Sport Institute Pacific (CSI Pacific) is committed to protecting the privacy of individuals whose personal information is collected and held by us in our databases. As part of our commitment to you, we want to clarify why we may ask for your personal information.

### DEFINITIONS

The following terms have these meanings in this Policy:

- a) “*Personal Information Protection Act of British Columbia (“the Act”)*” – Regulates the way private sector organizations within British Columbia collect, use, keep, secure and disclose personal information; and
- b) “*Personal Information*” – All information about an identifiable individual.

### APPLICATION

We collect your personal information in order to give you information about services available to athletes, including Performance Services, Support Services and Life Services and to coaches, including Professional and Educational Services, Funding Services, and Resource Services. We also collect your personal information and use it to deliver those services to you. We may also collect and use your information, in anonymous form, for statistical purposes regarding internal or external issues of mutual interest to members of the athletic community and generally, to provide you with the types of services expected by our member athletes and coaches. This policy outlines how CSI Pacific will treat the personal information that we gather in accordance with the *Act*.

### PROCEDURES

#### 1. COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

Where practical, we endeavour to collect personal information directly from the person to whom the information pertains. If necessary, we may collect personal information from other sources. If you are an individual to whom the *Act* applies, by asking CSI Pacific to provide services to you, or by donating to the organization, you consent to our necessary collection, use or disclosure of your personal information in order to properly provide the requested services to you or in order for the organization to receive the gift.

It is our policy to collect personal information about individuals in accordance with the provisions of the *Act*.

In general, we will try to get your explicit consent to use or disclose your personal information. In some instances your consent is implied from the fact that you have given us your personal information unless indicated by writing. The *Act* deems that an individual has consented to our collection, use or disclosure of personal information about that individual if, at the time the consent is deemed to be given, the purpose would be considered obvious to a reasonable person. In such circumstances, we may collect, use or disclose personal information without obtaining a written or verbal consent to do so.

You may withdraw your consent to our collection, use or disclosure of your personal information at any time, by giving us notice in writing.

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considered obvious to a reasonable person. In such circumstances, we may collect, use or disclose personal information without obtaining a written or verbal consent to do so.

However, we will never give out your contact information or other sensitive information about you without your express consent, unless we are obligated to do so by law. The *Act* also permits us to collect, use or disclose personal information about an individual in some circumstances without the individual's consent. Those include (but are not limited to) circumstances in which:

- the collection, use or disclosure is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- it is reasonable to expect that the collection or use of personal information with the consent of the individual would compromise the availability or accuracy of the information, and the collection or use of the information is necessary for an investigation or proceeding;
- it is reasonable to expect that the disclosure of personal information with the consent of the individual would compromise an investigation or proceeding, and the disclosure of the information is necessary for an investigation or proceeding;
- the personal information is available to the public from a prescribed source;
- the collection, use or disclosure of personal information is required or authorized by law.

When we collect, use or disclose personal information, we will make reasonable efforts to ensure that it is accurate and complete. If your personal information changes, we ask that you notify us as soon as possible so that we may keep our records up to date.

## **2. RETENTION OF PERSONAL INFORMATION**

CSI Pacific will keep personal information used to make a decision that directly affects individuals for at least one year after such a decision is made.

Subject to the above one-year retention requirement, we will only retain personal information for as long as necessary to fulfil the identified purposes or as long as required for legal or business purposes..

## **3. SECURITY OF PERSONAL INFORMATION**

We recognize our legal obligations to protect the confidential information of our athletes, coaches, donors, volunteers and others who provide us with their personal information. We have therefore made arrangements to secure the data against the unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction of personal information.

## **4. REQUESTS FOR ACCESS TO PERSONAL INFORMATION**

The *Act* permits individuals to submit written requests to us to provide them with:

- their personal information under our custody or control;
- information about how their personal information under our control has been and is being used by us;
- the names of the individuals and organizations to whom their personal information under our control has been disclosed by us.

We will respond to requests in the time allowed by the *Act* and will make a reasonable effort to assist applicants and to respond as accurately and completely as reasonably possible. All requests may be subject to any fees and disbursements the law permits us to charge.

An individual's ability to access his or her personal information under our control is not absolute. The *Act* provides that we must not disclose personal information when:

- the disclosure could reasonably be expected to threaten the safety or physical or mental health of an individual other than the individual who made the request;
- the disclosure can reasonably be expected to cause immediate or grave harm to the safety or to the physical or mental health of the individual who made the request;
- the disclosure would reveal personal information about another individual;
- the disclosure would reveal the identity of an individual who has provided personal information about another individual and the individual providing the personal information does not consent to disclosure of his or her identity.

The *Act* further provides that we are not required to disclose personal information when:

- the personal information is protected by solicitor-client privilege;
- the disclosure of the personal information would reveal confidential commercial information that, if disclosed, could, in the opinion of a reasonable person, harm the competitive position of an organization;
- the personal information was collected without consent for the purposes of an investigation, and the investigation and associated proceedings and appeals have not been completed;
- the personal information was collected or created by a mediator or arbitrator in the conduct of a mediation or arbitration for which he or she was appointed to act:
  - i. under a collective agreement,
  - ii. under an enactment, or
  - iii. by a court.

## **5. REQUESTS FOR CORRECTION OF PERSONAL INFORMATION**

The law permits individuals to submit written requests to us to correct errors or omissions in their personal information that is in our custody or control. We will:

- correct the personal information and, if reasonable to do so, send correction notifications to any other organizations to whom we disclosed the incorrect information; or
- decide not to correct the personal information, but annotate the personal information that a correction was requested but not made.

## **6. CONTACTING OR COMMUNICATING WITH US**

If you have any questions with respect to our policies concerning the handling of your personal information, or if you wish to request access to, or correction of, your personal information under our care and control, please contact our Privacy Officer, Wendy Pattenden, CEO, to ensure compliance with PIPA, at:

Canadian Sport Institute Pacific  
4371 Interurban Rd  
Victoria, BC V9E 2C5  
Telephone (250) 220-2500 Fax (604) 295-6960

If you are dissatisfied with our handling of your personal information, we invite you to contact us in writing, setting out the reasons for your concern. If, after we have reviewed and responded to your concern, you remain dissatisfied, you may wish to contact the Office of the Information and Privacy Commissioner at:

Office of the Information and Privacy Commissioner for British Columbia  
PO Box 9038 Stn Prov Govt  
Victoria, BC V8W 9A4  
Telephone (250) 387-5629 Toll-Free (800) 663-7867 Fax (250) 387-1696