

7.0 PERSONAL INFORMATION PROTECTION POLICY

Policy Category:	Business Operations
Approval Authority:	CEO & Board
Lead Responsibility:	Information Technology
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POLICY STATEMENT

At Canadian Sport Institute Pacific, CSI Pacific, we are committed to providing both our clients and our Staff with exceptional service. As providing this service involves the collection, use and disclosure of some personal information, protecting this personal information is one of our highest priorities. This policy applies to all CSI Pacific employees, volunteers and contractors.

This policy will also outline how CSI Pacific will treat the personal information gathered in accordance with British Columbia's *Personal Information Protection Act* (PIPA) for both our Staff and our clients. PIPA, which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

This policy will dictate how CSI Pacific will inform our clients and Staff of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices that need to be followed in protecting personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of personal information and allowing requests for access to, and correction of, personal information.

This Policy applies to CSI Pacific Staff and clients and dictates how to collect, disclose and share personal information for the purposes of the organization related to sport performance, medical information and business purposes.

This policy also applies to any service providers collecting, using or disclosing personal information on behalf of CSI Pacific.

Collecting Personal Information of Staff

CSI Pacific will, for the purposes of employment, collect Staff personal information for the purposes of establishing, managing, and terminating Staff relationship. This may include, but is not limited to, a Staff member's resume, references, letter of offer/employment contract and signed acceptance, other correspondence, details of salary and payroll records, reviews, relevant medical certificates, proof of education, letters of commendation, complaints, or discipline and any other matters related to the team members' history with CSI Pacific.

In accordance with the PIPA legislation, CSI Pacific prohibits the collection, use, or disclosure of Staff's personal information without consent unless the collection, use, or disclosure is for the purposes of establishing, managing, or terminating the employment relationship between the organization and the individual.

All Staff information will be saved in an electronic file securely stored in CSI Pacific's electronic systems and/or a paper file maintained in a secure, locked filing cabinet. Access to Staff information will be limited to those authorized with a bona fide business-related need-to-know reason.

Staff files and information will not be released to any unauthorized person. If a Staff member wishes for information in their file to be released, they may provide written consent to our Human Resources or the CSI Pacific Privacy Officer.

Staff will be responsible for keeping all personal information up to date through CSI Pacific's electronic system. Information related to diversity and inclusion will be requested of Staff to help CSI Pacific with their mandate to have and promote a diverse and inclusive organization. This request for information is voluntary and Staff can opt out of providing this information to CSI Pacific.

CSI Pacific may collect, use or disclose personal information without knowledge or consent in the following limited circumstances:

- When the collection, use or disclosure of personal information is permitted or required by law;
- In an emergency that threatens a Staff's life, health, or personal security.
- When the personal information is available from a public space.
- When legal advice from a lawyer is required.
- For the purpose of collecting a debt.
- To investigate a breach of an agreement or a contravention of law.

Staff files are created on the date of hire and all information collected will be kept on file for no less than 4 years after the employment relationship has ended, or as required otherwise by law or professional regulations. CSI Pacific will use appropriate security measures when destroying personal information such as shredding documents, or deleting electronically stored information.

Collecting Personal Information of Clients

Unless the purposes for collecting personal information are obvious and the personal information is provided for those purposes, CSI Pacific will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.

CSI Pacific will only collect information that is necessary to fulfill the following purposes including:

- Identification and contact information (name, address, date of birth, telephone number, emergency contact, etc.)
- Sport performance information (testing, monitoring, anthropometric, schedules, GPS, biomechanics, etc.)
- Provincial health care identifying numbers and/or private insurer identifying numbers.
- Health information (symptoms, diagnosis, medical history, test results, reports and treatment, record of allergies, prescriptions, etc.)

Personal information is collected in order to:

- Provide information on CSI Pacific programs, benefits and services including performance Services, Educational Programming, Partner service and benefits.
- Enhance sport performance through tracking client performance information that can be used in monitoring progression, creating training plans, and providing feedback
- Enhance medical care by using information to identify medical history to facilitate return to sport, rehabilitation, mental health support, referral to other medical practitioners, travel, administration of drugs with anti-doping regulations.
- Administer academic and applied research to expand current knowledge and practices related to sport performance where information is used anonymously for statistical purposes and shared with sport partners or academic institutions.
- Personal information related to diversity and inclusion which can be opted out by the individual
- Where practical, CSI Pacific will to collect personal information directly from the person to whom the information pertains. If necessary, personal information may be collected from other sources (i.e., sporting organization).

Consent

CSI Pacific will obtain consent to collect, use or disclose personal information (except where, as noted below, CSI Pacific is authorized to do so without consent).

Consent can be provided verbally, in writing, and through CSI Pacific Athlete Consent (agreement) form or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the client voluntarily provides personal information for that purpose

Where a minor's information is required, a parent or guardian may be required to provide consent, unless consent is implied in the delivery of CSI Pacific purposes

Consent may also be implied where notice has been given and a reasonable opportunity to opt-out of personal information being used for mail-outs or other CSI Pacific communications, and the client does not opt-out.

Subject to certain exceptions (e.g., the personal information is necessary to provide sport performance service or the withdrawal of consent would frustrate the performance of a legal obligation), clients can withhold or withdraw their consent for CSI Pacific to use their personal information in certain ways. A decision to withhold or withdraw consent to certain uses of personal (performance) information may restrict CSI Pacific's ability to provide a particular service, program or benefit. If so, the situation will be explained to assist in decision making.

CSI Pacific may collect, use or disclose personal information without knowledge or consent in the following limited circumstances:

- When information is received from a partner sport organization for the purposes of identifying clients for CSI Pacific programs, services and benefits and where this information has been consented to share by the partner sport organization.
- When the collection, use or disclosure of personal information is permitted or required by law;
- In an emergency that threatens a client's life, health, or personal security.
- When the personal information is available from a public space.
- When legal advice from a lawyer is required.
- For the purpose of collecting a debt.
- To investigate a breach of an agreement or a contravention of law.

Using and Disclosing Personal Information

CSI Pacific will only use or disclose personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related CSI Pacific practice such as:

- Disclosure to share personal information with other providers involved in medical or sport performance, including (but not limited to) other physicians and specialists, nutritionists, physiotherapists and CSI Pacific performance service Staff
- Disclosures to other parties whom CSI Pacific is a partner for sport performance and including (but not limited to) high performance directors, administrators, coaches, external sport consultant and CSI Pacific performance service Staff
- Disclosure to conduct research with a post-secondary institution, or research related projects that involve anonymized data

CSI Pacific will not use or disclose personal information for any additional purpose unless consent to do so is obtained. CSI Pacific will not sell personal information to other parties

Retaining Personal Information

If CSI Pacific uses personal information to make a decision that directly affects the client that personal information will be retained for at least one year so that there is a reasonable opportunity to request access to it.

Subject to policy 4.1, CSI Pacific will retain personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose which include:

- Sport performance information that is necessary to show progression or improvements over time, that may be used to inform performance plans, return from injury, providing feedback, and ongoing client pathway indicators
- CSI Pacific medical records that will be retained for a minimum period of 16 years, or as otherwise required by law and professional regulations.

Ensuring Accuracy of Personal Information

CSI Pacific will make reasonable efforts to ensure that client information is accurate and complete where it may be used to make a decision or disclosed to another organization.

Clients may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made to medical@csipacific.ca in writing and provide sufficient detail to identify the personal information and the correction being sought.

If the personal information is demonstrated to be inaccurate or incomplete, it will be corrected as required and CSI Pacific will send the corrected information to any organization to which the personal information has been disclosed to in the previous year. If the correction is not made, the correction request will be noted in the file.

Securing Personal Information

CSI Pacific is committed to ensuring the security of personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.

The following security measures will be followed to ensure that personal information is appropriately protected:

- Physical copies will be stored in a secured location when not in use.

- Electronic data will be stored in some instance or combination of the following: on computers or servers which require the use of user IDs, passwords, encryption, firewalls. These measures will restrict employee access to personal information as appropriate.
- Cloud based services that are strictly for exchanging information with our partners where data storage has been approved by IT to ensure proper backup and management of that data. Sensitive data that falls under PIPA, such as medical information, data that can lead to fraud and identify theft, etc., will be stored on servers based in Canada
- CSI Pacific will use appropriate security measures when destroying personal information such as shredding documents, or deleting electronically stored information
- Security policies and controls will continually be reviewed and updated as technology changes to ensure ongoing personal information security.

Providing Client Access to Personal Information

Clients have a right to access their personal information, subject to limited exceptions:

- 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 their identity.
- A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. A request to access personal information should be forwarded to the Privacy Officer
- Upon request, CSI Pacific will also tell clients how their personal information and to whom it has been disclosed if applicable.
- CSI Pacific will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- A minimal fee may be charged for providing access to personal information. Where a fee may apply, CSI Pacific will inform the client of the cost and request further direction on whether or not the request should be processed.
- If a request is refused in full or in part, CSI Pacific will notify the client in writing, providing the reasons for refusal and the recourse available.

Questions and Complaints and The Role of The Privacy Officer

The Privacy Officer or individual who has been designated this role is responsible for ensuring CSI Pacific's compliance with this policy and PIPA.

Staff and clients should direct any complaints, concerns or questions regarding CSI Pacific's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, Staff and clients may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for CSI Pacific Privacy Officer or designated individual:

Wendy Pattenden, CEO,
Canadian Sport Institute Pacific
4371 Interurban Rd
Victoria, BC V9E 2C5

Telephone (604) 833-9248

Policy Acknowledgment

I, _____, acknowledge that I have received and read the above Personal Information Protection Policy and the appropriate CSI Pacific Standard Operating Procedures ("SOP") which outline my responsibilities and expectations from CSI Pacific. By my signature below, I acknowledge that I understand, accept, and agree to comply with the information contained within the Human Resources Policy and the SOP's. My signature also acknowledges that revisions of this policy or SOP's may occur, and all such changes will generally be communicated through official notices. I understand that revised information may supersede, modify, or eliminate existing policies.

Employee Name

Employee Signature

Date