

7.0 PERSONAL INFORMATION PROTECTION POLICY

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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 Personal Information Protection Policy (the “**Policy**”) applies to the collection, use and disclosure of personal information by all CSI Pacific employees, volunteers, and contractors (collectively, “**Staff**”), as well as any service providers collecting, using, or disclosing personal information on behalf of CSI Pacific.

This Policy outlines how CSI Pacific treats the personal information gathered in accordance with British Columbia’s *Personal Information Protection Act* (“**PIPA**”). 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.

PIPA defines personal information as information about an identifiable individual and includes employee personal information but does not include contact information or work product information. This Policy dictates how CSI Pacific informs our clients and staff of why and how CSI Pacific collects, uses and discloses their personal information, obtains their consent where required, and only handles their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Policy, in compliance with PIPA, outlines the principles and practices that are followed to protect 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.

PERSONAL INFORMATION OF STAFF

Types of Staff Personal Information Collected by CSI Pacific

Types of personal information that may be collected by CSI Pacific include, but are 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 individual's employment history with CSI Pacific.

Information related to diversity and inclusion will also be requested of staff to help CSI Pacific with its 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 will notify staff of the purpose for collecting diversity and inclusion information at the time of collection. Staff may consent orally, in writing or electronically to the collection of diversity and inclusion information.

Purposes for Collection, Use and Disclosure of Staff Personal Information

CSI Pacific will collect, use, and disclose personal staff information necessary for establishing, managing, and terminating an employment relationship.

Consent of Staff

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

CSI Pacific may collect, use, or disclose personal information without knowledge or consent in accordance with PIPA including, without limitation, in the following circumstances:

- When the collection, use or disclosure of personal information is required or authorized by law;
- In an emergency that threatens an individual's life, health, or personal security;
- When the personal information is collected by observation at a sport event that is open to the public;
- When the personal information is available from a prescribed public source;
- When legal advice from a lawyer of CSI Pacific is required;
- For collecting a debt owed to CSI Pacific; or
- When it is reasonable to expect that the consent of the individual would compromise an investigation or proceeding.

Retaining Staff Personal Information

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.

Ensuring Accuracy of Staff Personal Information

Staff will be expected to keep all personal information up to date through CSI Pacific's electronic system, as well as to respond to any requests from CSI Pacific to confirm or update staff personal information.

Securing Staff Personal Information

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.

Providing Access to Staff Personal Information

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 must provide a written request to our Human Resources staff or the CSI Pacific Privacy Officer.

PERSONAL INFORMATION OF CLIENTS

Types of Client Personal Information Collected by CSI Pacific

CSI Pacific collects the following types of client information:

- 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; and
- Health information (symptoms, diagnosis, medical history, test results, reports and treatment, record of allergies, prescriptions, etc.).

Purposes for Collection, Use and Disclosure of Client Personal Information

Unless the purposes for collecting personal information are obvious and the individual voluntarily provides the individual's personal information 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.

- Personal information is collected 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, and administration of drugs with anti-doping regulations; and
- 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.
- CSI Pacific will collect, use, or disclose only the personal information that is necessary to fulfill the above purposes.

Consent of Clients

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).

Where practical or otherwise required under PIPA, CSI Pacific will collect personal information directly from the person to whom the information pertains. If necessary and permitted under PIPA, personal information may be collected from other sources (i.e., sporting organization).

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 for the purposes set out herein, 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 at the time of collection of the personal information; and a reasonable opportunity to opt-out of the collection, use and disclosure of personal information; 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. CSI Pacific will explain the consequences of withdrawing consent to the client at the time of the client's request.

CSI Pacific may collect, use, or disclose personal information without knowledge or consent in accordance with PIPA including, without limitation, in the following circumstances:

- When personal information is received from a partner sport organization for the purposes of identifying clients for CSI Pacific programs, services, and benefits, where the individual has provided consent to the partner sport organization to share this personal information;
- When the collection, use or disclosure of personal information is required or authorized by law;
- In an emergency that threatens a client's life, health, or personal security;
- When the personal information is collected by observation at a sport meet that is open to the public;
- When the personal information is available from a prescribed public source;
- When legal advice from a lawyer of CSI Pacific is required;
- For collecting a debt owed to CSI Pacific; or
- When it is reasonable to expect that the consent of the client would compromise an investigation or proceeding.

Using and Disclosing Client 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 to a 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;
- Disclosure 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; and
- Disclosure to conduct research, 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. Prior to disclosing personal information to service providers, CSI Pacific will ensure that an agreement is in place with such service provider requiring the service provider to comply with PIPA obligations.

Retaining Client 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.

CSI Pacific will retain personal information only as long as necessary to fulfill the identified purposes or a legal or business purpose which include but are not limited to:

- 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; and
- CSI Pacific medical records that will be retained for a minimum period of 16 years, or as otherwise required by law and professional regulations.

GENERAL PERSONAL INFORMATION PRACTICES

Ensuring Accuracy of Personal Information

CSI Pacific will make reasonable efforts to ensure that personal information of clients and staff is accurate and complete.

Individuals may request correction to their personal information to ensure its accuracy and completeness. A request to correct personal information must be made to hr@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 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, or 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 Access to Personal Information

Individuals have a right to access their personal information, subject to limited exceptions set out in PIPA, which include where:

- 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 could 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; or
- 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.

An individual may request access to their personal information in the following manner:

- 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 using the contact information provided below. Individuals may be required to prove their identity prior to being granted access to their personal information.
- Upon request, CSI Pacific will inform individuals how and to whom their personal information has been disclosed.
- 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 individual of the cost and request further direction on whether the request should be processed. CSI Pacific may require payment of a deposit or the entire fee prior to releasing the requested information.
- If a request is refused in full or in part, CSI Pacific will notify the individual in writing, providing the reasons for refusal and the recourse available.

Breach of Privacy

All CSI Pacific Staff and service providers must immediately report to the Privacy Officer any suspected breaches of privacy, including theft or loss of personal information, inadvertent disclosure of personal information to unauthorized recipients, breaches of system security, and unauthorized access to personal information in the possession of or under the control of CSI Pacific.

The Privacy Officer will take appropriate steps to investigate all reported breaches of privacy and direct any necessary corrective measures to prevent any further breaches. The Privacy Officer will notify the Information and Privacy Commissioner of British Columbia and all affected individuals of the breach of privacy where required by PIPA or where otherwise considered appropriate by the Privacy Officer.

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

Contact information for the Office of the Information and Privacy Commissioner:

Office of the Information and Privacy Commissioner
3rd Floor, 756 Fort Street
Victoria, BC V8W 9A4 Telephone (250) 387-5629

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 SOPs. My signature also acknowledges that revisions of this policy or SOPs may occur, and all such changes will be communicated through official notices. I understand that revised information may supersede, modify, or eliminate existing policies.

Full Name

Signature

Date

