



# Privacy Policy

Re-approved by the Board of Directors on August 25, 2021

## **Purpose of this Policy**

1. This policy describes the way that Squash Ontario collects, uses, retains, safeguards, discloses and disposes of personal information, and states Squash Ontario's commitment to collecting, using and disclosing personal information responsibly. This policy is based on the standards required by Canada's Privacy Law, and Squash Ontario's interpretation of these responsibilities.

## **Background**

2. Our organization, Squash Ontario, is the governing body for the sport of squash in Ontario, and provides these services to members and the public:

- a) Arranges and encourages squash matches and competitions within Ontario;
- b) Seeks affiliation with other organizations with a view to the promotion of the game of squash;
- c) Encourages and promotes proficiency and excellence by Canadians in all aspects of the game of squash; and
- d) Upholds and promotes the rules of squash as may be adopted from time to time by the Canadian Squash Racquets Association.

## **Personal Information**

3. Personal information is information about an identifiable individual. Personal information includes information that relates to their personal characteristics (e.g., gender, age, income, home address or phone number, ethnic background, family status), their health (e.g., health history, health conditions, health services received by them) or their activities and views (e.g., religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information, however, does not include business information (e.g., an individual's business address and telephone number), which is not protected by privacy legislation.

## **Accountability**

4. The Executive Director is the Privacy Officer and is responsible for the monitoring information collection and data security, and ensuring that all staff receives appropriate training on privacy issues and their responsibilities. The Privacy Officer also handles personal

information access requests and complaints. The Privacy Officer may be contacted at [lyates@squashontario.com](mailto:lyates@squashontario.com) or by calling 647-360-0420.

## **Purpose**

5. Personal information will only be collected by Squash Ontario to meet and maintain the highest standard of organizing and programming the sport of squash. Squash Ontario collects personal information from prospective members, coaches, referees, participants, managers and volunteers for purposes that include, but are not limited to, the following:

- a) Name, address, home telephone number, business telephone number, cell phone number, fax number and e-mail address for the purpose of providing communications and information from Squash Ontario.
- b) NCCP number, education, resume and experience for database entry at the Coaching Association of Canada to determine level of certification and coaching qualifications.
- c) Officiating education, certification, resume and experience to determine officiating qualifications.
- d) Credit card information for registration at conferences, registration of tournaments, registration of membership, purchasing equipment, coaching manuals and other resources.
- e) Date of birth, gender and athlete biography for media releases and to determine age group.
- f) Banking information, social insurance number, criminal records check, resume, and beneficiaries for Squash Ontario's payroll, company insurance and health plan.
- g) Personal health information including provincial health card numbers, allergies, emergency contact and past medical history for use in the case of medical emergency or health and safety screening.
- h) Athlete information including height, dietary supplements taken, uniform size, shoe size, feedback from coaches and trainers, club affiliation, performance results, biography information, and Squash Ontario registration number for required registration forms, outfitting uniforms, media relations, and components of selection.
- i) Athlete whereabouts information including sport/discipline, training times and venues, training camp dates and locations, travel plans, competition schedule, and disability, if applicable, for Canadian Centre for Ethics in Sport inquiries for the purpose of out-of-competition doping testing.
- j) Marketing information including attitudinal and demographic data on individual members to determine membership demographic structure, and program wants and needs.

k) Passport numbers and Aeroplan/frequent flyer number for travel purposes.

l) Advertisements - Individuals providing their addresses or e-mail addresses to Squash Ontario shall receive advertisements from Squash Ontario, an alumni letter, a news-letter and donation request for the purpose of fundraising.

6. If a purpose has not been identified herein, Squash Ontario will seek consent from individuals when personal information is used for a purpose not already consented to. This consent will be documented as to when and how it was received.

### **Consent**

7. Consent is required to be obtained by lawful means from individuals at the time of collection, prior to the use or disclosure of the personal information. If the consent to the collection, use or disclosure was not obtained upon receipt of the information, consent will be obtained prior to the use or disclosure of that information. Squash Ontario may collect personal information without consent where reasonable to do so and where permitted by law.

8. By providing personal information to Squash Ontario, individuals are consenting to the use of the information for the purposes identified in this policy.

9. In determining the form of consent to use, Squash Ontario will take into account the sensitivity of the information.

10. Squash Ontario will not, as a condition of a product or service, require an individual to consent to the collection, use or disclosure of information beyond that required to fulfill the specified purpose.

11. An individual may withdraw consent to the collection, use or disclosure of personal information at any time, subject to legal or contractual restrictions, provided the individual gives one week's notice of such withdrawal to Squash Ontario. The Privacy Officer will advise the individual of the implications of such withdrawal.

### **Limiting Collection**

12. All personal information will be collected fairly, by lawful means and for the purposes as specified in this policy. Squash Ontario will not use any form of deception to obtain personal information.

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

13. Personal information will not be used or disclosed by Squash Ontario for purposes other than those for which it was collected as described herein, except with the consent of the individual or as required by law.

14. Information disclosed to a third party with consent from the individual shall be protected by a third party agreement to limit use and disclosure.

15. Personal information will be retained for certain periods of time in accordance with the following:

a) Registration data and athlete information will be retained for a period of three years after an individual has left a program of Squash Ontario, in the event that the individual chooses to return to the program;

b) Parental/family information will be retained for a period of three years after an individual has left a program of Squash Ontario, in the event that the individual chooses to return to the program;

c) Information collected by coaches will be retained for a period of three years after an individual has left a program of Squash Ontario, in the event that the individual chooses to return to the program.

d) Employee information will be retained for a period of seven years in accordance with Canada Customs and Revenue Agency requirements.

e) Personal health information will be immediately destroyed when an individual chooses to leave a program of Squash Ontario.

f) Marketing information will be immediately destroyed upon compilation and analysis of collected information.

g) Credit card information shall be destroyed immediately after use.

h) As otherwise may be stipulated in federal or provincial legislation.

16. Personal information that is used to make a decision about an individual will be maintained for a minimum of one year of time to allow the individual access to the information after the decision has been made.

17. Squash Ontario may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where Squash Ontario 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 or otherwise as permitted by applicable law.

18. Documents will be destroyed by way of shredding and electronic files will be deleted in their entirety. When hardware is discarded, Squash Ontario will ensure that the hard drive is physically destroyed.

### **Participation in Tournaments**

19. Participating in Squash Ontario competitions means that the athlete may filmed or photographed by Squash Ontario or its representatives during competition or events incidental to competition. Agreeing to participate in Squash Ontario tournaments means that these videos or images of the athlete may be used and published by Squash Ontario for its own purposes (including but not limited to: pictures on the Squash Ontario website, pictures in Squash Ontario publications, videos in rules clinics and workshops, and videos on the Squash Ontario website and/or YouTube channel) with the consent of the athlete and/or the consent of athlete's parent or legal guardian (if the athlete is younger than 18 years old) and without payment to the athlete. Pictures and/or videos created in this manner remain the property of Squash Ontario. The athlete and/or the athlete's parent or legal guardian (if the athlete is younger than 18 years old) may revoke this consent at any time.

### **Accuracy**

20.. Squash Ontario will use accurate and up-to-date information as is necessary for the purposes for which it is to be used, to minimize the possibility that inappropriate information may be used to make a decision about an individual.

### **Safeguards**

21. Personal information is protected by security safeguards appropriate to the sensitivity of the information against loss or theft, unauthorized access, disclosure, copying, use or modification.

22. Methods of protection and safeguards include, but are not limited to, restricted access to offices, security clearances, need-to-know access and technological measures including the use of passwords, encryption and firewalls.

23. The following steps will be taken to ensure security:

- a) Paper information is either under supervision or secured in a locked or restricted area.
- b) Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers.

- c) Paper information is transmitted through sealed, addressed envelopes or in boxes by reputable courier/delivery companies.
- d) Electronic information is transmitted either through a direct line or is encrypted.
- e) Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with this policy.
- f) External consultants and agencies with access to personal information will provide Squash Ontario with appropriate privacy assurances.

**Openness:**

24. Squash Ontario will publicize information about its policies and practices relating to the management of personal information. This information is available through this policy, on Squash Ontario's web site or upon request by contacting the Privacy Officer at [jnicholls@squashontario.com](mailto:jnicholls@squashontario.com) or by calling 647-360-0420.

25. The information available to the public includes:

- a) The name or title, address and telephone number of Squash Ontario's Privacy Officer.
- b) The forms that may be used to access personal information or change information.
- c) A description of the type of personal information held by Squash Ontario, including a general statement of its approved uses.

**Individual Access:**

26. Upon written request, and with assistance from Squash Ontario, an individual may be informed of the existence, use and disclosure of his or her personal information and will be given access to that information. As well, an individual is entitled to be informed of the source of the personal information along with an account of third parties to whom the information has been disclosed.

27. Requested information will be disclosed to the individual within 30 days of receipt of the written request at no cost to the individual, or at nominal costs relating to photocopying expenses, unless there are reasonable grounds to extend the time limit.

28. If personal information is inaccurate or incomplete, it will be amended as required.

29. An individual may be denied access to his or her personal information if:

- a) This information is prohibitively costly to provide;
- b) The information contains references to other individuals;
- c) The information cannot be disclosed for legal, security or commercial proprietary purposes;

d) The information is subject to solicitor-client or litigation privilege.

30. Upon refusal, Squash Ontario will inform the individual the reasons for the refusal and the associated provisions of the Privacy Law.

### **Challenging Compliance**

31. An individual may challenge Squash Ontario's compliance with this policy and the Privacy Law, by submitting a challenge in writing to Jamie Nicholls at [jnicholls@squashontario.com](mailto:jnicholls@squashontario.com).

32. Upon receipt of a written complaint, Squash Ontario will:

a) Record the date the complaint is received;

b) Notify the Privacy Officer who will serve in a neutral, unbiased capacity to resolve the complaint;

c) Acknowledge receipt of the complaint by way of telephone conversation and clarify the nature of the complaint within three days of receipt of the complaint;

d) Appoint an investigator using Squash Ontario personnel or an independent investigator, who will have the skills necessary to conduct a fair and impartial investigation, and who will have unfettered access to all files and personnel, within ten days of receipt of the complaint.

e) Upon completion of the investigation and within 25 days of receipt of the complaint, the investigator will submit a written report to Squash Ontario.

f) Notify the complainant of the outcome of the investigation and any relevant steps taken to rectify the complaint, including any amendments to policies and procedures, within 30 days of receipt of the complaint.

33. An individual may appeal a decision made by Squash Ontario under this Policy, in accordance with Squash Ontario's policies for appeals.

### **Approval and Review**

34. This Policy was approved by the Board of Directors of Squash Ontario June 2008

### **IP Address**

35. When the user's web browser requests a web page from another computer on the Internet, it automatically gives that computer the address where it should send the information. This address is called the computer's "IP address."

36. Squash Ontario does not collect, use or disclose IP Addresses.

### **Cookies**

37. Cookies are small text files that a Web browser transfers to and from your hard drive for record keeping purposes. Cookies make life easier for you by saving your passwords, purchases, and preferences while you're at our site. The use of cookies is an Internet standard, and you'll find cookies at most major Web sites.

38. The use of cookies is an industry standard and many major browsers are initially set up to accept them. You can reset your browser to either refuse to accept all cookies or to notify you when you have received a cookie. However, if you refuse to accept cookies, you may not be able to use some of the features available on websites.

39. Squash Ontario does not use cookies to identify specific individuals.

### **Copyright and Legal Disclaimer**

40.. This web site is a product of Squash Ontario. The information on this Web site is provided as a resource to those interested in squash. Squash Ontario disclaims any representation or warranty, express or implied, concerning the accuracy, completeness or fitness for a particular purpose of the information. Persons accessing this information assume full responsibility for the use of the information and understand and agree that Squash Ontario is not responsible or liable for any claim, loss or damage arising from the use of this information. Reference to specific products, processes or services does not constitute or imply recommendation or endorsement by Squash Ontario. Squash Ontario also reserves the right to make changes at any time without notice.

41. Links made available through this website may allow you to leave the Squash Ontario site. Please be aware that the internet sites available through these links are not under the control of Squash Ontario. Therefore, Squash Ontario does not make any representation to you about these sites or the materials available there. Squash Ontario is providing these links only as a convenience to you, and in no way guarantees these links and the material available there. Squash Ontario is not responsible for privacy practices employed by other companies or websites.

### **Applicable Law**

42. This site is created and controlled by Squash Ontario in the province of Ontario. As such, the laws of the province of Ontario will govern these disclaimers, terms and conditions, without giving effect to any principles of conflict of laws.