

# Privacy Policy

## PREAMBLE

1. Bobsleigh CANADA Skeleton ("BCS") is committed to the collection, usage and disclosure of Personal Information to the best of its abilities in a fully responsible manner. This Privacy Policy respects the principles of Canada's *Personal Information Protection and Electronic Documents Act* and sets out the ground rules for BCS's fair information practices.

## PERSONAL INFORMATION

2. Personal Information is information about an identifiable individual and includes descriptors or data relating to personal characteristics (e.g. gender, age, income, ethnicity, race, family status), health (e.g. health history, health conditions, health services received), personal beliefs and views (e.g. religious beliefs, political views), or contact details (e.g. address, phone number).

## COLLECTION AND USE OF PERSONAL INFORMATION

3. Upon collecting any Personal Information on behalf of BCS, BCS will identify the reason(s) for collecting it and how it will be used. BCS will not collect, use or disclose Personal Information beyond that which is required to fulfill the specified purpose and will only share the minimum amount of Personal Information required to fulfill the specified purpose.
4. Personal information may be collected from more than one source and combined.
5. Where possible when involving a third-party, BCS will use contracts or other agreements to ensure the protection of Personal Information, which has been collected by BCS and transferred to a third-party for use, including but not limited to:
  - i. The Personal Information transferred to a third-party will be limited to what is necessary for the third-party to fulfill the contract or agreement;
  - ii. The third-party will be required to refer to BCS any requests for access to or complaints about the information provided;
  - iii. When Personal Information is no longer needed by the third-party, the third-party will return the information to BCS and/or dispose of it in a manner acceptable to BCS.
6. Personal Information collected by or on behalf of BCS will be retained only as long as necessary to satisfy the purpose(s) for which it is collected. Any Personal Information collected by or on behalf of BCS that is no longer required for a specified purpose or a legal requirement will be destroyed, erased or rendered anonymous in a manner that will prevent improper access.
7. BCS will make efforts to keep the Personal Information collected as accurate, complete and up-to-date as is necessary, taking into account the purpose(s) for which the information is collected and the interests of the individual.

## **CONSENT**

8. BCS requires an individual's consent to the collect, use and/or disclose their Personal Information.
9. BCS shall get such consent (i) before or when any Personal Information is collected by or on behalf of BCS, or (ii) when the reason for collecting the information and/or how it will be used changes.
10. Consent may be obtained in person, by phone, by mail, by email, by internet, or by any other reasonable method whether express or implied.
11. In providing their Personal Information to BCS, the individual acknowledges and consents that BCS may retain service providers to perform certain services and that, in the event that, a service provider is located in another jurisdiction, Personal Information may be processed and stored in that jurisdiction, and that foreign courts or law enforcement or regulatory agencies may be able to obtain disclosure of Personal Information through the laws of those jurisdictions.
12. An individual who has provided their Personal Information shall have the right to withdraw their consent; however, this may limit BCS's ability to provide certain services.

## **SAFEGUARDING PERSONAL INFORMATION**

13. BCS uses security standards and safeguards appropriate to the sensitivity of the Personal Information collected in an effort to ensure that Personal Information is protected against unauthorized access, disclosure, theft, copying, use or modification. These safeguards may include, without limitation, locked filing cabinets, restricted access to offices, and technological measures including the use of passwords, encryption and firewalls.

## **CONFIDENTIALITY**

14. BCS will not share any Personal Information provided to BCS with anyone outside of BCS except when required by law or court order, or where the individual has provided prior consent.
15. BCS will never sell, rent, or loan Personal Information to any third-party.
16. Individuals who have provided their contact details as part of their Personal Information may periodically be contacted by BCS regarding, but not limited to, events, opportunities, and queries.

## **ACCESSING AND AMENDING PERSONAL INFORMATION**

17. Any requests or enquiries about this Privacy Policy can be directed to the BCS National Office.

18. Any individual that has provided Personal Information to BCS shall have access to that Personal Information collected, used or disclosed by or on behalf of BCS.
19. An individual may review, amend or update the Personal Information collected about them.
20. If BCS refuses access to an individual to the Personal Information collected, BCS will provide to the individual the reason for the refusal and any recourse available.
21. Where possible, a response to a request for access to Personal Information by an individual will be made within 30 days of the request.
22. BCS will make every effort to provide access of any individual to their Personal Information at minimal or no cost. If cost is anticipated to provide the information requested, BCS will advise of the cost prior to disclosing the information.
23. BCS will investigate and respond to all concerns about any aspect of the collection, use and disclosure of Personal Information in a timely manner. Where necessary, an individual will be advised of available avenues of complaint including the Office of the Privacy Commissioner of Canada.
24. BCS will take appropriate measures to correct any inaccurate Personal Information that is identified or to modify policies or procedures where necessary.

## **POLICY RESPONSIBILITY**

25. The BCS Chief Executive Officer (also known as Executive Director) has primary responsibility for ensuring compliance with the BCS Privacy Policy as set out herein and has the authority to intervene on privacy issues that relate to any of BCS's operations. The Chief Executive Officer is responsible for the following:
  - i. Collection, use and disclosure of Personal Information;
  - ii. Responding to requests and general inquiries for Personal Information;
  - iii. Responding to requests for correction to Personal Information;
  - iv. Responding to complaints about the collection, use and disclosure of Personal Information by BCS;
  - v. Explaining the purpose(s) for the collection, use and disclosure of Personal Information;
  - vi. Explaining the procedure to withdraw consent and the consequences, if any of such a withdrawal.
26. The Chief Executive Officer may delegate any responsibilities set herein to another BCS employee or to an individual approved by BCS. All BCS officials and employees, or any individual approved by BCS to handle any responsibilities set out herein, are required to understand the nature and scope of and adhere to the BCS Privacy Policy.

## **WEBSITE LINKS**

27. BCS's website may contain links to other sites. BCS does not screen partner links. As such, BCS is not responsible for the privacy practices of such other sites. Website users are solely responsible for informing themselves about the privacy practices of each website that collects identifiable information. This Privacy Policy applies only to information collected by BCS.