

## CMHA Privacy Policy

Crowfoot Minor Hockey Association (“CMHA”) has developed this Privacy Policy for implementation beginning February 1, 2022. This Policy describes the way that CMHA its directors, employees, member and volunteers collect, use, retain, safeguard, disclose and dispose of the personal information of prospective members, members, and others including players, coaches, referees, managers and volunteers.

This Policy describes the way that CMHA will, subject to applicable legal requirements, adhere to all relevant federal and provincial legislative privacy requirements. The Policy follows the principles identified in the provincial Personal Information Protection Act (PIPA). The Policy describes each principle and the method of implementing each. CMHA will strive to meet or exceed provincial legislative requirements and will ensure that it remains current with changing technologies and laws. Any and all changes will be posted to the CMHA web site.

### 1. Accountability

1.1 CMHA Board of Directors will appoint a staff/volunteer person (the “Privacy Officer”) whose responsibilities will include those of the implementation and monitoring of the CMHA Privacy Policy. The Privacy Officer will be responsible for CMHA compliance with privacy principles. This person will also be responsible for responding to access requests in accordance with this Policy. The Privacy Officer will report to the President of the Board of Directors of CMHA, or designate, and the ultimate responsibility for Privacy issues will rest with the CMHA Board of Directors. The Privacy Officer may at his/her discretion enlist assistance from other staff/Board members and/or volunteers within the organization. This will not in any manner mitigate his/her responsibility for Privacy issues.

1.2 The Privacy Officer’s identity will be fully disclosed and publicly accessible to CMHA members and the public in general upon request. The CMHA Privacy Officer can be reached by e-mail at [privacy@crowfoothockey.com](mailto:privacy@crowfoothockey.com).

1.3 The CMHA Privacy Officer will ensure that CMHA manages all personal information in its possession in accordance with this Policy including that which may be transferred to a third party. Third party organizations who handle information on behalf of CMHA shall be contractually obligated to adhere to the standards of CMHA.

1.4 CMHA will implement internal policies which will facilitate adherence to this Privacy Policy including but not limited to the following:

- Security measures where necessary, designed to protect personal information in our possession.
- Implementing procedures designed to respond to complaints and/or inquiries.
- Staff/volunteer training in all facets of information management, including awareness of the CMHA Privacy Policy and Policies and Procedures developed in accordance with the Policy.

### 2. Identifying Purposes, Type of Information Collected and Website

2.1 CMHA shall only collect the information reasonably necessary to conduct Hockey programming. Access to our Privacy Policies and Procedures will be readily available. Similarly, the process by which challenges may be made to CMHA compliance and/or adherence to the

legislation in question shall be readily available and transparent. To obtain further information, contact the CMHA Privacy Officer.

**2.2** CMHA collects personal information from prospective members, members, coaches, referees, managers and volunteers for the purposes of conducting Hockey programming. Specifically:

- A player's name, address and date of birth are collected to determine that the player's geographical, division of play and level of play information are consistent with Hockey Canada, Hockey Calgary and CMHA bylaws and regulations.
- Historical information concerning past teams played for, is collected in order to determine if any Hockey Canada transfer regulations may apply.
- Information concerning an individual's skill level and development and feedback on programs is collected to measure the success of our programs in order that we may better plan future programs.
- Information as to a player's parents' name, address, telephone numbers and email addresses may be collected in order to facilitate emergency contact information as well as to ensure compliance with Hockey Canada and CMHA residency regulations.
- Educational information may be collected in order to ensure all Hockey Canada and CMHA residency regulations have been adhered to.
- E-mail addresses may be collected for the purposes of facilitating membership communication related to upcoming events and programs.
- Information about skill levels, ability, emergency contacts and health to ensure our activities are carried out in a safe and secure environment.
- Personal information collected for the purposes of hockey registrations may also be used for hockey specific research purposes including but not necessarily limited to hockey demographic type research.
- Affiliates: CMHA may disclose the personal information described in paragraph 2.2 to all of these affiliate organizations in order to facilitate Hockey Programming and ensure compliance with rules and regulations.
- Volunteers may also have access to and view a member's personal information which can include a member's medical status and/or vaccination status, including COVID status and negative test results for unvaccinated members. Volunteers are advised by CMHA that they are responsible and accountable for not disclosing personal information of any member of CMHA unless in accordance with this Privacy Policy or if requested by a regulatory body or under a municipal bylaw.

**2.3** CMHA will endeavor through Associations/Leagues to advise potential registration candidates of the purpose for the collection of the data requested at the time of registration or by reference to our web site at [www.crowfoothockey.com](http://www.crowfoothockey.com). We will further endeavor to ensure that all collectors of the personal information are familiar with the potential use of the personal data. All personal data collected by CMHA shall be maintained in either our office(s) and/or with our Privacy Officer.

**2.4** CMHA will request individual permission for the use of any personal data collected which is extraneous to that which has been identified above in 2.2, unless said usage and collection is authorized by law.

### **3. Consent**

**3.1** CMHA will use the personal information for the uses specified above in Section 2 and in Sections 3.2 and 3.3 below. By virtue of being a member of CMHA you are implicitly consenting to provide your information to CMHA and you are deemed to consent to our use of the information for the purposes listed in Section 2 of this Privacy Policy and to disclosure of the information to other associated organizations for the same purpose.

**3.2** CMHA recognizes that hockey by its nature is a contact sport and injuries are to a certain extent inherent in the game. We believe medical records, medical history, vaccination history and medical forms of the individual may be of assistance in an emergency situation and therefore we may request them. CMHA will consider receipt of this information as consent for its subsequent use in an emergency medical situation.

**3.3** If at any time you wish to withdraw your consent to the use of your information for any purposes, you may do so by contacting the Privacy Officer for CMHA. We will do our best to accommodate your request in a timely fashion without diminishing the services we provide to you. We will explain to you the impact of your withdrawal on any services we provide to you.

**3.4** CMHA may collect personal information without consent where reasonable to do so and where permitted by law.

### **4. Limiting Collection**

**4.1** All information shall be collected fairly and lawfully within the criteria as set forth in our Privacy Policy.

**4.2** CMHA shall not indiscriminately collect information. The amount and type of information we collect shall be limited to that which is required to fulfill our identified purposes.

**4.3** CMHA will not use any form of deception in gaining personal information from its members.

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

**5.1** Subject to applicable legislation, CMHA shall limit use of personal information it collects to purposes that we have disclosed in Sections 2 (Identifying Purposes) and 3.2 (Consent).

**5.2** CMHA shall maintain documents for certain periods of time dependent upon necessity. More specifically:

- We will normally maintain registration data for a minimum three-year period after an individual has left our programs in the event that an individual chooses to return to our programs after leaving.
- Parental/family information will be normally maintained for a similar three-year period after a member has left our programs.
- Affiliates. CMHA has numerous organizations which offer hockey programs under the auspices of Hockey Calgary. As explained above, CMHA may from time to time share information with these associations, and leagues in order to facilitate Hockey Programming and ensure compliance with rules and regulations.
- CMHA may at some point be involved in the sale, merger, transfer amalgamation or reorganization of its activities. We may disclose personal information to the other party in such a transaction. CMHA will ensure that we contractually obligate

the other party to treat this information in a manner consistent with our Privacy Policy.

- CMHA may disclose your personal information to a Government authority that has asserted its lawful authority to obtain the information or where the CMHA 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, person, or body with jurisdiction to compel the production of the information or otherwise as permitted by applicable law.
- CMHA may, at its discretion, release personal information for the purposes of collecting debts which may be owed to CMHA.

**5.3** Certain documents may be subject to legislated retention periods either Federally or Provincially and these will be respected at all times by CMHA.

## **6. Accuracy**

**6.1** CMHA shall strive to ensure to the extent it can that the information entrusted to us is maintained in an accurate manner. We shall try to maintain the interests of the individual and attempt to ensure that decisions are not made for or about an individual based on personal information that is flawed.

**6.2** CMHA shall only update information in the event of a renewal or registration and/or an update.

## **7. Safeguards**

**7.1** Security safeguards have been implemented to ensure your personal information is protected from theft as well as unauthorized access, disclosure, copying, use or modification thereof.

**7.2** The level of safeguards employed shall be directly related to the level of sensitivity of the personal information collected. The more sensitive the information, the higher the level of security employed.

**7.3** Methods of protection and safeguards to be employed shall include but in no way be necessarily limited to locked files, offices and storage areas, security clearances volunteer awareness regarding disclosure of personal information, the need to know, and access as well as technological measures such as passwords and encryption.

## **8. Individual Access**

**8.1** Subject to applicable legislation, upon request by the individual concerned, CMHA shall disclose whether or not it actually holds personal information on an individual. We shall disclose the source of this information when requested and provide an account of third parties to whom the information may have been disclosed.

**8.2** CMHA may request sufficient information to confirm your identity before releasing your personal information to you.

**8.3** Subject to applicable legislation, CMHA shall endeavor to provide this information within 30 days of receipt of the information requested and only charge nominal fees for the purpose of off-

setting its expenses incurred in supplying the requested information. This information shall be provided in an understandable format, at the time you make a request.

**8.4** Any inaccurate information that is brought to our attention shall be corrected by CMHA as quickly as possible and any pertinent third parties shall be apprised of the corrections in due course.

## **9. Challenging Compliance**

**9.1** CMHA has in place procedures for the resolution of grievances in the administration of its Privacy Policy.

**9.2** Upon receipt of a complaint CMHA shall make available the complaint procedures which will be simple and easy to access.

**9.3** CMHA shall investigate all complaints. If the complaint is deemed justified CMHA shall take the appropriate steps to ensure that compliance is achieved and will make changes to its policies to allow for compliance in the future. All complaints shall be addressed to the CMHA Privacy Officer by e-mail at [privacy@crowfoothockey.com](mailto:privacy@crowfoothockey.com).