

GOLF MANITOBA

Privacy Policy

Board Approval Date: June 15, 2017



Purpose of this Policy

1. Privacy of personal information is governed by the *Personal Information Protection and Electronics Documents Act* ("PIPEDA"). This policy describes the way that Golf Manitoba collects, uses, retains, safeguards, discloses and disposes of personal information, and states Golf Manitoba's commitment to collecting, using and disclosing personal information responsibly. This policy is based on the standards required by PIPEDA, and Golf Manitoba's interpretation of these responsibilities.

Background

2. Our organization, Golf Manitoba, is the governing body for the sport of golf in Manitoba & Northwest Ontario, and provides these services to members and the public:
 - a) Player Development Initiatives such as Games Training Squads, Rural Clinics, Golf in Schools Program and Camps & Clinics
 - b) Handicap and Course / Slope Rating systems
 - c) Fundraising Initiatives through Manitoba Liquor & Lotteries
 - d) Promotion & Publication of Golf Manitoba and the golf industry
 - e) Administrative support to the Manitoba Golf Scholarship Fund & The Manitoba Golf Hall of Fame
 - f) Provincial Championships

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. Jared Ladobruk (Golf Manitoba Executive Director) is the Privacy Officer and is responsible for the monitoring information collection and data security, and ensuring that all staff receive 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 the following address: 145 Pacific Avenue, Winnipeg MB, R3B2Z6.

Purpose

5. Personal information will only be collected by Golf Manitoba to meet and maintain the highest standard of organizing and programming the sport of golf. Golf Manitoba collects personal information from prospective members, members, coaches, officials, participants, managers and volunteers for purposes that include, but are not limited to, the following:
 - a) Name, address, phone number, cell phone number, fax number and e-mail address for the purpose of communicating about Golf Manitoba's programs, events and activities.
 - b) National Coach Certification Program (NCCP) number, education, resumes and experience for database entry at the Coaching Association of Canada to determine level of certification and coaching qualifications.

- c) Credit card information for registration at tournaments, conferences & events, travel administration, and purchasing other products and resources.
 - d) Date of birth, athlete biography, and member club to determine eligibility, age group and appropriate level of play.
 - e) Banking information, social insurance number, criminal records check, resume, and beneficiaries for Golf Manitoba's payroll, company insurance and health plan.
 - f) Criminal records check and related personal reference information for the purpose of implementing Golf Manitoba's volunteer screening program.
 - g) Personal health information including provincial health card numbers, allergies, emergency contact and past medical history for use in the case of medical emergency.
 - h) Athlete information including height, weight, uniform size, shoe size, feedback from coaches and trainers, performance results for athlete registration forms, outfitting uniforms, media relations, and various components of athlete and team 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 purposes of out-of-competition drug testing.
 - j) Body weight, mass and body fat index to monitor physical response to training and to maintain an appropriate weight for competition.
 - k) Marketing information including attitudinal and demographic data on individual members to determine membership demographic structure, and program wants and needs.
 - l) Passport numbers and Aeroplan/frequent flyer numbers for the purposes of arranging travel.
 - m) Name, address, phone number, cell phone number, fax number and e-mail address for the purpose of providing insurance coverage, managing insurance claims and conducting insurance investigations.
6. If a purpose has not been identified herein, Golf Manitoba 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. Golf Manitoba may collect personal information without consent where reasonable to do so and where permitted by law.
- 8. By providing personal information to Golf Manitoba, individuals are consenting to the use of the information for the purposes identified in this policy.
- 9. Golf Manitoba 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.
- 10. 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 Golf Manitoba. The Privacy Officer will advise the individual of the implications of such withdrawal.

Limiting Collection

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

Limiting Use, Disclosure and Retention

- 12. Personal information will not be used or disclosed by Golf Manitoba 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.
- 13. 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 up to three years after an individual has left a program of Golf Manitoba, in the event that the individual chooses to return to the program;

- b) Parental/family information will be retained for a period of up to three years after an individual has left a program of Golf Manitoba, in the event that the individual chooses to return to the program;
 - c) Information collected by coaches will be retained for a period of up to three years after an individual has left a program of Golf Manitoba, 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 Golf Manitoba.
 - f) Marketing information will be immediately destroyed upon compilation and analysis of collected information.
 - g) As otherwise may be stipulated in federal or provincial legislation.
14. 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.
15. Golf Manitoba may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where Golf Manitoba 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.
16. Documents will be destroyed by way of shredding and electronic files will be deleted in their entirety. When hardware is discarded, Golf Manitoba will ensure that the hard drive is physically destroyed.

Accuracy

17. Golf Manitoba 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

18. 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.
19. Methods of protection and safeguards include, but are not limited to, locked filing cabinets, restricted access to offices, security clearances, need-to-know access and technological measures including the use of passwords, encryption and firewalls.
20. 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 Golf Manitoba with appropriate privacy assurances.

Openness

21. Golf Manitoba will publicize information about its policies and practices relating to the management of personal information. This information is available through this policy, on Golf Manitoba's web site or upon request by contacting the Privacy Officer.
22. The information available to the public includes:
- a) The name or title, address and telephone number of Golf Manitoba'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 Golf Manitoba, including a general statement of its approved uses.

Individual Access

- 23. Upon written request, and with assistance from Golf Manitoba, 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.
- 24. 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 cost relating to photocopying expenses, unless there are reasonable grounds to extend the time limit.
- 25. If personal information is inaccurate or incomplete, it will be amended as required.
- 26. 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.
- 27. Upon refusal, Golf Manitoba will inform the individual the reasons for the refusal and the associated provisions of PIPEDA.

Challenging Compliance

- 28. An individual may challenge Golf Manitoba's compliance with this policy and PIPEDA, by submitting a challenge in writing.
- 29. Upon receipt of a written complaint, Golf Manitoba 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 Golf Manitoba 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 Golf Manitoba.
 - 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.
- 30. An individual may appeal a decision made by Golf Manitoba under this Policy, in accordance with Golf Manitoba's policies for appeals.