

Privacy Policy

Your privacy is important to the Carleton Heights Curling Club (CHCC). We are committed to meeting the privacy standards applicable to every member, customer and contractor of CHCC. You deserve to be treated fairly and with respect in all your interactions with us and this includes protecting the privacy of the personal information you have provided us.

The purpose of this policy is to tell you what personal information we collect about you, how we use it, whether we disclose it to anyone else, how long we keep it, how you can request certain personal information not be released and how you can request access to your personal information.

Accountability

We are responsible for the personal information under our control and we have designated a Privacy Officer who is responsible for our compliance with this policy and with privacy legislation. If you wish to contact our Privacy Officer you may do so through contacting CCHC by:

phone - 613-224-6224

e-mail - manager-carletonheightscc@bellnet.ca

mail - P.O. Box 5141, Station F, Ottawa, Ontario K2C 3H4

This privacy policy will always be available at the office, on our web site, or by contacting the Club Manager or Privacy Officer. Any changes or amendments will be posted on our web site and announced through club newsletters.

Purpose of Collection

We require your personal information to establish and serve you as a member, customer or contractor. We obtain all of our information only from yourself, with the exception of contractors for whom we may also obtain information from references provided by prospective contractors. The following lists the information collected and its use.

Members

Name, e-mail address and phone numbers – These are required for general business use and for publication in the annual membership book. Each league coordinator also requires this information and may publish the same information for use by members within their respective league. Furthermore, we retain the names of all club members in each year for historical purposes.

Address – This is required for general business use and for providing members with information by mail. Addresses for all members other than Day Ladies members are not published. Members registered in the Day Ladies section will have their address as well as their name and phone number published in a list provided to all Day Ladies members.

Age – Each member, on their annual registration form, is required to indicate the age category they are in corresponding to the age categories defined by the Canadian Curling Associations. Date of birth is not required by CCHC but members entering events outside the club may be required to provide this information to the hosting organization.

Awards & Photos – CCHC posts the names and in some cases photographs of members of winning teams inside the curling club and from time to time may also post these on the web site and in external publications.

Junior Members

Parents' names, emergency contacts and relevant medical information – These are required for all Junior members in addition to basic member information described above. All of this information is required for the safety and well-being of the junior members. It will be retained by the Junior coordinator and may be provided to any coach accompanying junior members to events outside the club.

Prospective Members

Name, address, e-mail address and phone number – These are collected only in order to contact prospective members with regard to availability of membership.

Private Party Customers & Rental Leagues

Name, address, e-mail address and phone number – We collect this information for general business use from the individual(s) responsible for organizing the respective event or league. We do not collect personal information of individual members of rental leagues except and unless they are participating in club events open to both members and rental leagues, in which case the information will be collected and used only to permit the individual to participate in the specific event and will not be used for any other purpose.

Contractors

Name, address, e-mail address, phone number, business references – We collect this information for general business purposes and to meet any legal obligations.

Files – files on contractors are maintained, including contract terms and performance.

Online Privacy Concerns

When you access our web site and move from page to page, read pages or download content onto your computer, we may learn which pages are visited and what content is downloaded. However, none of this information is associated with you as an individual. It is measured only in aggregate and used only to enable us to improve the website to better meet the needs of our members.

When you send us an e-mail or ask us to respond by e-mail we learn your exact email address and any information you have included in the e-mail. We will use your e-mail address to acknowledge your comments and/or reply to your questions. We will store your communication and our reply in case we correspond further. We may use your e-mail address to send you information about news or specific events that we believe may be of interest to you.

Consent

Consent is required for the collection of personal information and the subsequent use or disclosure of this information. We will seek consent for the use and disclosure of the information as provided for in this policy at the time the information is collected. The reasonable expectations of the individual are considered when using this information.

We accept any of the following as your consent for Carleton Heights Curling Club's existing use and future collection, use and disclosure of your personal information for the identified purposes:

- o your receipt of this Privacy Policy, unless you advise Carleton Heights Curling Club, in writing, that you do not agree with the terms stated in this policy, and that you wish to opt out of all or portions of it;
- o your express written consent as obtained through an application process.

Consent is implied in some circumstances:

- o If you submit an application on behalf of a family member, you represent that you have obtained consent from them, even though they may not be present during the application process, to the collection, use and disclosure for their personal information for the identified purposes.

Withholding Consent

While CCHC requires your personal information for its business purposes, members may request, in writing or by e-mail, that their personal information not be published or disclosed beyond the minimum requires to enable the member to participate fully in the club. This includes the right to opt out of having your name, e-mail and phone number published in the membership directory, having your address published in the Day Ladies directory or having your name and photo published for awards achieved.

Limiting of Collection, Use, Disclosure

We collect the information we need and only use it for the purposes explained to you at the time the information is collected. Should we wish to use the information for another purpose in the future we will ask for your consent at that time.

We do not sell your personal information to third parties. We may share some or all of your personal information with third parties such as local, provincial and national curling associations of which CCHC is a member, however, your personal information will not be disclosed to any third party that does not have a publicly available Privacy Policy for the protection of your personal information. We may also disclose your personal information where we are required or permitted to do so by law.

We retain your information only as long as it is required for the reasons it was collected. When your information is no longer needed for the purposes explained to you, we have procedures to destroy, delete, erase or convert it to an anonymous form.

Accuracy

You have the right to request that personal information which you believe to be inaccurate be corrected. We will make every reasonable effort to keep your information accurate and up-to-date. You can help by keeping us informed of any changes, such as if you move or change telephone numbers. If you find errors in our information about you, please let us know immediately.

Protecting Information

Your personal information is used by us only for the purposes identified and access to your personal information is limited to those members and contractors of CHCC who need to have access to it.

We will protect your information with appropriate safeguards and security measures, by physical measures, organizational measures and technological measures.

Access to Information

You have a right to access the personal information that we have about you. If you wish to access this information you should contact our Privacy Officer who will be pleased to assist you.

Respecting and Responding to Your Privacy Concerns

If you contact us we will explain your options of refusing or withdrawing consent to the collection, use or release of your information, and we will record and respect your choices. In most cases, you are free to refuse or withdraw your consent at any time by contacting our Privacy Officer.

If you have a complaint related to this Privacy Policy, or any of our procedures, please contact our Privacy Officer. We will respond to your request within 30 days. If your complaint is justified, we will take the steps necessary to resolve the issue, including amending our Policy and practices if necessary.

If we are not able to resolve your concerns, you may contact the Office of the Privacy Commissioner of Canada. Our Privacy Officer will provide you with this contact information upon request.

Carleton Heights Curling Club

Privacy Procedures

1. Purpose

- 1.1. The purpose of these procedures is to put into practice the necessary controls and procedures to ensure that CHCC is operating in full compliance with its Privacy Policy. All revisions to this policy require the approval of the CHCC Board of Directors.

2. Privacy Policy Statement

- 2.1. The privacy policy statement and any amendments thereto must be approved by the Board.
- 2.2. This statement will be accessible online from the CHCC web-site. A physical copy of this policy will be posted in a public area accessible to all members. Any member, customer or contractor requesting a copy of the policy statement will be provided a copy within a reasonable period of time.
- 2.3. It is the responsibility of the Club Manager to ensure that the policy statement is made available in the manner described in 2.2 above.

3. Registration Forms

- 3.1. Registration forms will contain the following paragraph.

I hereby agree to the collection and use of my personal information solely as provided for in the CHCC Privacy Policy, a copy of which has been made available to me.

Signature (Parent or Guardian's signature if under 18)

Date

4. Retention, Storage and Disposition of Personal Information

- 4.1. The person(s) authorised to hold personal information, the information they are permitted to hold, the retention of the information, the security to be exercised and the disposition methods are described in Attachment A.
- 4.2. The operations of the club may require that certain individual members such as the Membership Chair and league coordinators retain personal information of the members on their own personal computers. In order to ensure that these individuals are aware of their responsibilities with respect to acting in accordance with these procedures, the President will inform all such individuals in writing of their responsibilities by letter as per Attachment B.

5. Privacy Officer and Complaints Process

- 5.1. The Board of Directors will appoint one member of the club as the club's Privacy Officer.
- 5.2. The Privacy Officer will work with the club manager to ensure the Privacy Policy is adhered to.
- 5.3. Any complaints will be addressed to the Privacy Officer who will document and investigate complaints, resolve the issues, and report on the results of complaints to the Board.
- 5.4. All requests for information will be addressed to the Privacy Officer who will work with the club manager to ensure the requested information is provided within 30 days of the request. The Privacy Officer may report to the Board on the number of requests made but may not release information about those individuals requesting the information.

Approved by the Carleton Heights Board of Directors April 13, 2004.

Attachment A

Information	Authorized Holder(s)	Retention Period	Security	Disposition
Application forms	Membership chair, Club manager	Current + 2 years	Locked cabinet	shredding
Member names, addresses, phone numbers and e-mails	Membership chair, Club manager, Day Ladies secretary, Junior league coordinators & coaches	Current + 2 years except for Day Ladies who's retention is indefinite.	Physical – locked cabinet Electronic – password protected file	Physical – shredding Electronic – deletion of files or physical destruction of storage media if deletion not possible.
Member names, phone numbers and e-mails	League coordinators	Current + 1 year	Physical – controlled access Electronic – password protected	Physical – shredding Electronic – deletion of files or physical destruction of storage media if deletion not possible.
Junior Members' parents' names, emergency contacts, medical conditions	Junior program coordinator and coaches	Current + 1 year	Physical – controlled access Electronic – password protected	Physical – shredding Electronic – deletion of files or physical destruction of storage media if deletion not possible.
Customer information	Club Manager	Current + 3 years	Physical – locked cabinet Electronic – password protected file	Physical – shredding Electronic – deletion of files or physical destruction of storage media if deletion not possible.
Contractor information	Club President Ice Chair Club Manager	Longer of: 2 years after contract completion or as per legal requirements	Physical – locked cabinet Electronic – password protected file	Physical – shredding Electronic – deletion of files or physical destruction of storage media if deletion not possible.
Member phone book	All members and staff	Current + 2 years for copies retained by the club	Distribution is to members only. Club copies available in public areas of the club will be secured to prevent removal.	Shredding of club copies
Member names and years of membership only	Corporate & league secretaries & membership chair for historical purposes	Indefinite	Maintained with the corporate records	Not applicable

Attachment B

Template letter to Members having a need to hold personal information.

Date:

To: All CHCC Executive Members

Re: Privacy Policy

I wish to thank all of you for volunteering your time to act in your respective capacities for the upcoming curling season. As we prepare for this season you will require access to certain personal information from our fellow members. In keeping with our Privacy Policy, all of us with access to the personal information of the members have a duty to maintain the privacy of this information and to take reasonable measures to protect this information. In accepting your position on the CHCC Executive for this year you are also accepting to protect and secure personal information in accordance with our Privacy Policy and Privacy Procedures.

Attached is the club's Privacy Procedures for the protection and security of personal information. I ask that you review and adhere to these procedures as they apply to your particular circumstances. Should you require assistance with meeting these requirements please contact either our Privacy Officer or the Club Manager.

Regards

President
Carleton Heights Curling Club