

In 2004, Carleton Heights Curling Club (“CHCC” or “the club”) enacted a Privacy Policy (the “Policy”) that remains in full force and effect. However, there are certain amendments that must be made to the Policy to bring it in line with a new registration system that CHCC plans to install.

1. Privacy Policy

Your privacy is important to 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.

1.1 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 CHCC by:

phone - 613-224-6224

e-mail – privacy@carletonheightscc.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 an email notification.

1.1.1 Partnerships

The Club uses a web-based membership registration system (the “System”), that is provided by a 3rd party. The System has its own privacy policy which CHCC will make available from its website. The CHCC Executive has accepted this System and its privacy policy as of the amended date (shown in header) of this privacy policy. Information collected by the System may be shared with provincial or national curling associations.

1.2 Purpose of Collection and Use of Information

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.

1.2.1 Members and Customers

All members and customers are required to register for their member or customer event using the System. Special CHCC events such as bonspiels fall into this category. The following lists the mandatory information collected by the System and its use.

1.2.1.1 Name, e-mail address and phone numbers

These are required for general business use. Each league coordinator also requires this information and will publish the same information for use by members within their respective league. Unless otherwise indicated by the league coordinator, contact information will also be posted on the club website in a

password protected file. Furthermore, we retain the names of all club members in each year for historical purposes.

1.2.1.2 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.

1.2.1.3 Date of Birth

This is required by the System for determination of age based discounts (as of 30-June) and age eligibility for certain leagues. CHCC advises customers and members not wanting to state their true date of birth to replace the month and day of birth with 31-Dec. The true date of birth should be stated by those competing in provincial or national curling events.

1.2.1.4 Gender

This is used to determine eligibility for certain leagues. The System provides an unspecified option in addition to its binary alternatives.

1.2.1.5 Emergency Contact Information

Emergency contact & phone number is available only to CHCC Executive and applicable member or customer coordinator (league coordinator). This information is used only in event of an emergency involving the member or customer.

1.2.2 Awards & Photos

CHCC posts the names and in some cases photographs of members (including Junior Members) of winning teams or members from the curling club and from time to time may also post these on the web site and in external publications. CHCC may post photos of general curling activities from its member events (including Junior Members) on the web site. Unless otherwise stated, CHCC may use images of yourself and/or your registered child as indicated herein.

1.2.3 Junior Members

Junior members provide the same information to the System as stated for Members or Customers. Additional information related to allergies and relevant medical 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.

1.2.4 Prospective Members

Prospective members are invited to register on the System and be subject to the same privacy as Members or Customers. We may collect name, address, e-mail address and phone number in order to contact prospective members with regard to availability of membership.

1.2.5 Contractors

We collect name, address, e-mail address, phone number, business references for general business purposes and to meet any legal obligations. Files on contractors are maintained, including contract terms and performance.

1.2.6 CHCC Web Site

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.

1.2.6.1 The System

When you register online using the System, tracking cookies are used to identify you for login purposes.

These cookies are detailed in the privacy policy for the System.

1.2.7 Email

When you send us an e-mail or ask us to respond by email 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.

1.3 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:

- 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;
- your express written consent as obtained through an application process.

Consent is implied in some circumstances:

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

1.3.1 Withholding Consent

While CHCC 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 required 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.

1.4 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 CHCC 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.

1.5 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.

1.6 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.

1.7 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.

1.8 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 Club Manager or 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 Club Manager or Privacy Officer will provide you with this contact information upon request.

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 CHCC Executive April 13, 2004.

Amendments approved at the CHCC Executive meeting on July **, 2021.

1.1 Attachment A

Information	Authorized Holder(s)	Retention Period	Security	Disposition
Application forms	Membership chair, Club	Current + 2 years	Locked cabinet	shredding
Member names, addresses, phone numbers and e-mails	Membership chair, Club manager, Day Ladies secretary, Junior league coordinators	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	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.

1.2 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