



# ACA-CSC Privacy Policy – Personal Information- Draft

ALPINE CANADA ALPIN

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## Purpose

Alpine Canada Alpin- Canadian Ski Coaches (ACA-CSC) is a not-for-profit organization providing coaches with the necessary foundation of skills, knowledge, and attitudes to foster excellence in alpine ski coaching. In the course of providing our programs and services, ACA-CSC may collect Personal Information. Except for certain eCommerce activities described in the “eCommerce” section below, ACA-CSC does not conduct any commercial activities and is therefore not subject to most Canadian personal information privacy statutes. Nevertheless, ACA-CSC respects the right of individuals to understand how their Personal Information is used. This Privacy Policy sets out how ACA-CSC collects, uses, and discloses Personal Information during the course of our activities and how we strive to ensure that Personal Information in our possession remains accurate and confidential.

## What is Personal Information?

*“Personal Information”* is any recorded information about an identifiable individual, other than information exempted by applicable privacy laws (e.g. business contact information such as name, title, business address). Aggregated or anonymized data from which the identity of an individual cannot be determined is not Personal Information. ACA-CSC reserves the right to use Personal Information to create aggregated or anonymized data and to use such data in any way that ACA-CSC determines appropriate.

ACA-CSC only collects, uses, and discloses Personal Information for purposes that would be considered reasonable in the circumstances and only such Personal Information as is required for the purposes of providing services or information to participants, partner organizations, and others.

## How ACA-CSC Collects Personal Information

- ACA-CSC uses only fair and lawful methods to collect Personal Information.
- ACA-CSC may collect Personal Information verbally or in writing (including via electronic media) from participants, partner organizations, or other third parties.

## Consent

Unless permitted by law, ACA-CSC does not collect Personal Information without first obtaining the consent of the individual concerned. However, ACA-CSC may seek consent to use and disclose Personal Information after it has been collected in those cases where ACA-CSC wishes to use the information for a purpose not identified in this Policy or not previously identified or for which the individual concerned has not previously consented.

By providing Personal Information to ACA-CSC you agree and consent that we may collect, use, and disclose your Personal Information in accordance with this Privacy Policy. If ACA-CSC plans to collect Personal Information for purposes other than those disclosed in this Privacy Policy, it will inform you of those purposes at the time that the Personal Information is collected and seek your consent.

You may either refuse to give your consent to the collection, use, and disclosure of your Personal Information or withdraw your consent at any time upon reasonable notice. In certain circumstances, some services can only be offered by ACA-CSC if you provide ACA-CSC with consent to the collection, use, and disclosure of your Personal Information. Consequently, if you choose not provide us with consent or withdraw your consent, we may not be able to offer you the services requested.

## Purposes for the Collection and Use of Personal Information

Except for the purposes identified in the “eCommerce” section below, ACA-CSC only collects and uses Personal Information for the following purposes:

1. Administer the ACA-CSC Coach Accreditation Program and maintain the associated database;
2. Administer the ACA-CSC eLearning and other internal programs;
3. Administer our coach bursary and grant programs;
4. Track participant accreditations;
5. Organize various conferences that provide professional development and networking opportunities for coaches;
6. Manage our various awards and recognition programs;
7. Provide information to participants, partner organizations, and others about coach education related programs and services;
8. Manage our relationship, and communicate, with, among others, participants and partner organizations;
9. Meet legal and regulatory requirements;
10. Manage our website and other information technology infrastructure;
11. Recruit, hire, manage, evaluate, compensate, and otherwise deal with our employees and contractors; and
12. Other reasonable purposes consistent with the above purposes.

The Personal Information we may collect from each individual will depend upon our relationship with that individual and which services the individual wishes to obtain from ACA-CSC.

ACA-CSC does not otherwise sell, trade, barter, exchange, or disclose for consideration any Personal Information it has collected.

### **When ACA-CSC May Disclose Your Personal Information**

In carrying out the purposes set out above, ACA-CSC may disclose your Personal Information to:

1. Individuals at Alpine Canada Alpin;
2. Provincial or Territorial Coaching Associations and Coordinators;
3. Individuals at the National Coaching Institutes and their chosen, vetted, associates;
4. Governmental agency funders of ACA, ACA-CSC and the NCCP;
5. Print and electronic media in connection with awards and recognition programs;
6. Individuals or organizations assisting ACA-CSC in informing you about our products or services;
7. ACA-CSC advisers or service providers; and
8. Individuals or organizations involved in:
9. Maintaining, reviewing, and developing our business systems, procedures, and infrastructure including testing or upgrading our computer systems; or
10. A reorganization of the ACA-CSC

In the event sensitive Personal Information is provided to ACA-CSC, we will not disclose such Personal Information unless it is required in order to provide a participant or partner organization with our services.

Where ACA-CSC discloses Personal Information to organizations that perform services on its behalf, we will require those service providers to use such information solely for the purposes of providing services to ACA-CSC, participants, partner organizations, or the person concerned and to have appropriate safeguards for the protection of that Personal Information.

In some circumstances, ACA-CSC may disclose Personal Information without consent. Such circumstances include:

1. Where required by law or by order or requirement of a court, administrative agency or governmental tribunal;
2. Where ACA-CSC believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety, or property of an identifiable person or group;
3. Where it is necessary to establish or collect monies owing to ACA-CSC; or
4. Where it is necessary to permit ACA-CSC to pursue available remedies or limit any damages that we may sustain

Where obliged or permitted to disclose information without consent, ACA-CSC will not disclose more information than is required.

### **Accuracy and Retention of Personal Information**

ACA-CSC endeavors to ensure that any Personal Information provided and in its possession is as accurate, current, and complete as necessary for the purposes for which we use that information. If we become aware that Personal Information is inaccurate, incomplete or out of date, ACA-CSC will revise the Personal Information and, if necessary, use reasonable commercial efforts to inform third parties which were provided with inaccurate information so that those third parties may also correct their records.

We keep Personal Information only as long as it is required for the reasons it was collected. The length of time we retain Personal Information varies, depending on the service and the nature of the information.

The retention period for Personal Information may extend beyond the end of an individual's relationship with us but it will be only for so long as it is necessary for us to have sufficient information to respond to any issues that may arise at a later date.

When your Personal Information is no longer required for ACA-CSC's purposes, we have procedures to destroy, delete, erase or convert it into an anonymous form.

Currently, the principal places in which ACA-CSC holds Personal Information are in the City of Montreal and nearby municipalities where off-site storage facilities may be located.

### **Protection of Personal Information**

ACA-CSC endeavors to maintain appropriate physical, procedural, and technical security with respect to its offices and information storage facilities so as to minimize the possibility of loss, misuse, unauthorized

access, disclosure, or modification of Personal Information. This also applies to our disposal or destruction of Personal Information.

ACA-CSC further protects Personal Information by restricting access to it to those employees that the management of ACA-CSC has determined need to know that information in order that we may provide our products or services or information.

If any employee or contractor of ACA-CSC misuses Personal Information, this will be considered as a serious offence for which disciplinary action may be taken, up to and including termination of employment. If any individual or organization misuses Personal Information that is provided to the individual or organization for the purpose of providing services to or for ACA-CSC, this will be considered a serious issue for which action may be taken, up to and including termination of any agreement between ACA-CSC and that individual or organization.

### **Access to Your Personal Information**

ACA-CSC permits the reasonable right of access and review of Personal Information held by us about an individual. To guard against fraudulent requests for access, we may require sufficient information to allow us to confirm that the person making the request is authorized to do so before granting access or making corrections.

ACA-CSC reserves the right to decline to provide access to Personal Information where the information requested:

1. Would disclose (i) Personal Information, including opinions, about another individual or about a deceased individual; or (ii) trade secrets or other business confidential information that may harm ACA-CSC or the competitive position of a third party;
2. Would interfere with contractual or other negotiations of ACA-CSC or a third party;
3. Is subject to solicitor-client or litigation privilege;
4. Is not readily retrievable and the burden or cost of providing would be disproportionate to the nature or value of the Personal Information;
5. Does not exist, is not held, or cannot be found by ACA-CSC;
6. Could reasonably result in (i) serious harm to the treatment or recovery of the individual concerned,
7. (ii) serious emotional harm to the individual concerned or another individual, or (iii) serious bodily harm to another individual;
8. May harm or interfere with law enforcement activities and other investigative or regulatory functions of a body authorized by law to perform such functions; or
9. May be withheld or is requested to be withheld under applicable legislation.

Where Personal Information will not or cannot be disclosed, the individual making the request will be provided with the reasons for non-disclosure.

ACA-CSC reserves the right not to change any Personal Information in response to an amendment request from an individual but may append any alternative text the individual concerned proposes.

ACA-CSC will not charge you for verifying or correcting your Personal Information, however, to the extent permitted by applicable law, there may be a minimal charge imposed if you need a copy of records containing Personal Information.

## **eCommerce**

ACA-CSC may from time to time on its website offer eCommerce services which might include the sale of goods or services offered by the CSCF or by third party vendors.

In the course of offering eCommerce services, ACA-CSC may collect, store, analyze, and use Personal Information that users disclose to ACA-CSC in the course of concluding eCommerce transactions, including without limitation: contact information (such as name, email address, and physical address) and financial information (such as credit card number and expiration date). Personal Information will be used by ACA-CSC, by third parties on ACA-CSC's behalf and by third party vendors for purposes relating to eCommerce transactions, including without limitation fulfillment of orders, billing, payment, marketing, and customer service matters.

By entering into eCommerce transactions on ACA-CSC website, you consent to the collection, storage, analysis, and use of your Personal Information for the purposes set forth above. ACA-CSC may also collect, store, analyze, and use your Personal Information provided by others for the purposes set forth above, including without limitation payment processing services, and other online and offline sources.

If you do not wish to have your Personal Information used for marketing purposes, please contact ACA's privacy officer by sending an email to [info@alpinecanada.org](mailto:info@alpinecanada.org) or calling 403-777-3200, and ask to speak with ACA's Privacy Officer.

## **Website**

Our web servers track general information about visitors such as their domain name, time of visit and which pages are being accessed. This information is used internally, only in aggregate form, to better serve visitors by helping us to:

1. Manage our site;
2. Diagnose any technical problems; and
3. Improve the content of our website.

In browsing the web, you will encounter a technology known as "cookies". "Cookies" are files or pieces of information that may be stored in a computer's hard drive when an individual visits a website. Most Internet browsers are initially set to accept cookies. If you do not wish to accept cookies, you can set your Internet browser software to refuse cookies or to alert you when cookies are being sent.

"*Session*" cookies are temporary bits of information that are erased once a visitor exits its web browser window or otherwise turn its computer off. Session cookies are used to improve navigation on websites and to collect aggregate statistical information.

"*Persistent*" cookies are more permanent bits of information that are placed on the hard drive of a visitor's computer and stays there unless it is deleted. Persistent cookies store information on a visitor's computer for a number of purposes, such as retrieving certain information previously provided (e.g., passwords),

helping to determine what areas of the website visitors find most valuable, and customizing the website based on visitor preferences.

We do not share Personal Information obtained through cookies with any third parties.

We have no control over the content of third party websites that individuals may access through hyperlinks at our website. We encourage everyone to read the privacy policy of every website they visit.

### **Resolving Your Privacy Concerns**

In the event of questions about: (i) access to your Personal Information; (ii) our collection, use, management or disclosure of Personal Information; or (iii) this Privacy Policy; please contact ACA's privacy officer by sending an email to [info@alpinecanada.org](mailto:info@alpinecanada.org) or calling 403-777-3200, and ask to speak with ACA's Privacy Officer.

ACA-CSC will investigate all complaints and, if a complaint is justified, we will take all reasonable steps to resolve the issue.

## Appendix A :

### Alpine Canada Alpin – Canadian Ski Coaches (ACA-CSC) Privacy Policy Consent

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You may either refuse to give your consent to the collection, use, and disclosure of your Personal Information or withdraw your consent at any time upon reasonable notice. In certain circumstances, some services can only be offered by ACA-CSC if you provide ACA-CSC with consent to the collection, use, and disclosure of your Personal Information. Consequently, if you choose not to provide ACA-CSC with consent or withdraw your consent, ACA-CSC may not be able to offer you the services requested.

I, \_\_\_\_\_<First Name + Last Name>\_\_\_\_\_, give consent to ACA-CSC to collect, use, and disclose my Personal Information in accordance with the Privacy Policy.

I do not, \_\_\_\_\_<First Name + Last Name>\_\_\_\_\_, give consent to ACA-CSC to collect, use, and disclose my Personal Information in accordance with the Privacy Policy.