



## Policy on Privacy of Personal Information

### (1) Policy Statement

1(1) Gay Ottawa Volleyball (GOV) attaches great importance to the protection of the privacy of individuals and representatives with whom it engages. Achieving GOV's vision of providing all members of the LGBTQ2+ community with an opportunity to participate, develop and excel in the sport of volleyball in a safe, inclusive and encouraging environment depends on its ability to maintain the trust of its members, particularly as steward of information.

1(2) GOV is committed to ensuring that all personal information collected for its programs remains secure and confidential.

### (2) Scope

2(1) This policy applies to:

- (a) GOV Representatives and individuals participating in GOV programming, tournaments, activities, meetings, events, or communications, including social media; and
- (b) Members of the public who communicate with GOV.

2(2) This policy does not apply to the use or distribution of personal information or images obtained legally by individuals or members of the public, such as images captured at GOV events posted on an individual's social media platforms.

### (3) Definitions

3(1) An **individual** is any person participating in GOV programming or events, such as players and guests as well as other clients and agents acting on behalf of GOV and members of the public.

3(2) A **GOV representative** is a GOV director, officer, coordinator, or any person appointed to organize and supervise GOV activities.

### (4) Responsibilities and Expectations

4(1) The **GOV Vice-President, Administration** is responsible for the administration of this policy, including:

- (a) Putting in place security safeguards for the storage and retention of personal information;
- (b) Ensuring that GOV representatives are aware of and follow this policy;
- (c) Following-up with appropriate GOV representatives on requests for access to personal information by individuals and the correction of inaccuracies;
- (d) Appropriate disposal of personal information when it is no longer required for the purpose for which it was collected.

4(2) **GOV Representatives** are responsible for:

- (a) Ensuring that consent is able to be provided by individuals when GOV collecting personal information; and
- (b) Ensuring that this policy is followed when accessing and using personal information.

## **(5) Collection and Use of Personal Information**

5(1) GOV collects, uses and discloses only the personal information necessary to provide individuals with programming and manage other programming-related operations. Personal information collected by GOV may include an individual's:

- (a) Full name, email address, date of birth, phone number, home/ mailing address;
- (b) Image;
- (c) Username and password in connection with an individual's GOV account;
- (d) Payment information; and
- (e) Other optional information a part of an individual's account profile.

5(2) The purposes for which GOV collects personal information will be identified before or at the time it collects the information. In certain circumstances, the purposes for which information is collected may be clear, and consent may be implied, such as where an individual's name, address and payment information are provided as part of the registration process for a particular activity.

5(3) GOV may collect, hold, and use the personal information it collects for one or more of the following purposes:

- (a) Direct management and delivery of programs and activities for which an individual is registered;
- (b) Mailing out newsletters or generally communicating with all individuals regarding GOV programming and activities;
- (c) Compiling lists of members' names and contact information and collecting membership fees;
- (d) Internal record keeping and administrative purposes; and
- (e) Any other reasonable purpose directly related to the management and delivery of GOV programming and activities.

## **(6) Consent**

6(1) Knowledge and consent are required for the collection, use or disclosure of personal information.

6(2) Providing GOV with their personal information is always the choice of the individual. However, an individual's decision not to provide certain information may limit GOV's ability to provide them with programming and information.

6(3) GOV will not require an individual to consent to the collection, use, or disclosure of information as a condition to the supply of a program or service, except as required to be able to supply the program or service.

## **(7) Limited Use, Disclosure, and Retention**

7(1) GOV does not collect any personally identifiable information about an individual when they visit its website or any of its social media platforms, unless they voluntarily provide this information, for example by completing an online form.

7(2) Personal information may only be used or disclosed for the purpose for which it was collected unless an individual has otherwise consented, or when it is required or permitted by law.

7(3) Personal Information will only be retained for the period of time required to fulfill the purpose for which GOV collected it or as may be required by law.

7(4) GOV may use third parties:

- (a) to provide certain services to individuals in relation to GOV programming; or
- (b) as part of community-level collaborative, partnership or promotion activities.

7(5) In such cases as described under 7(3), GOV will require that any third party with which it may share personal information to protect that data in a manner consistent with this policy and to limit the use of such personal information to the performances of service on behalf of GOV.

### **(8) Accuracy and Safeguarding**

8(1) Personal Information will be maintained in as accurate, complete and up-to-date form as is necessary to fulfill the purposes for which it is to be used.

8(1) Personal information will be protected by security safeguards that are appropriate to the sensitivity level of the information. We take all reasonable precautions to protect an individual's personal information from any loss or unauthorized use, access or disclosure.

### **(9) Openness and Access to Personal Information**

9(1) We will make information available to individuals about our policies and practices with respect to the management of their personal information.

9(2) Upon request, individuals will be informed of the existence, use and disclosure of their personal information, and will be given access to it. Individuals may verify the accuracy and completeness of their personal information, and may request that it be amended, if appropriate.

### **(10) Inappropriate Use of Personal Information**

10(1) Any use of personal information that is inconsistent with this policy may be subject to sanction by the GOV Board of Directors.

10(2) Examples of inappropriate use of information may include:

- (a) Unauthorized sharing information with third parties without the consent of the individual;
- (b) Using information for one's personal gain or that is inconsistent with GOV's conflict of interest policy;
- (c) The selling of information;
- (d) Identity fraud; or
- (e) Any other use that is deemed to be inappropriate by the Board.

### **(11) Sanction**

11(1) A breach of this policy is subject to disciplinary action.

11(2) The GOV Board of Directors will decide what action is appropriate. The Board may impose sanctions to enforce this policy.

11(3) In applying sanctions, GOV's primary focus will be ensuring the integrity and privacy of individuals' personal information.

11(4) Sanctions may include but are not limited to a verbal or written warning.

11(5) For GOV representatives, additional sanctions may be imposed up to and including removal from their position, in accordance with GOV By-laws and policies.

### **(12) Complaints**

12(1) Any person who believes that GOV has breached its responsibilities may file a complaint with the GOV Vice-President, Administration.

12(2) The Vice-President, Administration will promptly inform the Board and investigate the complaint. The Vice-President, Administration will then provide the findings of the investigation and any recommendations regarding corrective or disciplinary action to the Board.

12(3) The Vice-President, Administration will respond to the individual in writing on the Board's conclusion and the steps to be taken to rectify the situation.

**(13) Amendments and Review**

13(1) GOV will review this policy as required and will make necessary adjustments to ensure that it meets the needs of the League.

13(2) Inquiries about this policy and related procedures can be made to the President of the League.

13(3) GOV will make this policy publicly available on its website.

13(4) GOV will take reasonable steps to inform GOV representatives and individuals of material changes to this policy.

  
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Tim Klodt, Chair of the Board

2 July 2020  
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Date

  
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James Clemens, Secretary to the Board

2 July 2020  
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Date