



Excellence, Integrity, Innovation, Collaboration

PRIVACY POLICY

**** This Policy is based on the standards required by Personal Information Protection and Electronic Documents Act (PIPEDA) and Alberta's Personal Information Privacy Act (PIPA) as interpreted by Swim Alberta ****

Definitions

1. The following terms have these meanings in this Policy:
 - a) *Commercial Activity* – any particular transaction, act or conduct that is of a commercial character.
 - b) *“Personal Information”* – any information about an identifiable individual that relates to the person's personal characteristics including, but not limited to: gender, age, income, home address, home phone number, ethnic background, family status, health history, and health conditions.
 - a) *“Stakeholder”* – Individuals employed by, or engaged in activities on behalf of, Swim Alberta including: coaches, staff members, contract personnel, volunteers, managers, administrators, committee members, and directors and officers of Swim Alberta.
 - b) *“Member”* – All categories of membership defined in Section 2.1 of the Swim Alberta *Constitution and Bylaws* as well as all Stakeholders and individuals employed by, or engaged in activities with, Swim Alberta including, but not limited to, clubs, athletes, coaches, officials, volunteers, managers, administrators, directors and officers of Swim Alberta, spectators at events, and parents/guardians of athletes.

Purpose

2. Swim Alberta recognizes Members' right to privacy with respect to their Personal Information. This Policy describes the way that Swim Alberta collects, uses, safeguards, discloses, and disposes of Personal Information including the Personal Information obtained through our website and in the course of online activities.
3. This Policy integrates the principles guiding and reflected in Canada's privacy laws that apply to privacy individuals.

Application of this Policy

4. This Policy applies to any activity that involves the collection, use or disclosure of Personal Information by or on behalf of Swim Alberta.
5. This Policy does not apply where information has been fully de-identified. This Policy also does not apply to information that is not considered Personal Information, including business contact information if the collection, use or disclosure is for the purpose of enabling the individual to be contacted in relation to the individual's business responsibilities and for no other purpose.
6. Please read this Policy carefully to understand our policies and practices for processing and storing Personal Information. By engaging with our website and otherwise providing your personal information to us in the course of using our services or engaging with us, you accept and consent to the practices described in this Policy. This Policy may change from time to time. Your continued engagement with our website and with Swim Alberta after any such revisions indicates that you accept and consent to them. We ask that you please check this Policy periodically for updates.
7. Except as may be restricted by applicable privacy legislation, the Board of Directors of Swim Alberta will have the authority to interpret any provision of this Policy that is contradictory, ambiguous, or unclear. This Policy does not create or confer upon any individual any rights, or impose upon Swim Alberta any rights or obligations, outside of, or in addition to, any rights or obligations imposed by applicable privacy laws.

Obligations

8. Unless permitted or required to do so by applicable law, Swim Alberta Stakeholders will not:
- a) Publish, communicate, divulge, or disclose to any unauthorized person, firm, corporation, or third party any Personal Information without the consent of the Member.
 - b) Use or disclose Personal Information in a manner that has not been consented to by a Member.
 - c) Process Personal Information in a manner contrary to this Policy.
 - d) Knowingly place themselves in a position where they are under obligation to any organization to disclose Personal Information.
 - e) In the performance of their official duties, disclose Personal Information to family members, friends, colleagues, or organizations in which their family members, friends, or colleagues have an interest
 - f) Derive personal benefit from Personal Information that they have acquired during the course of fulfilling their duties with Swim Alberta.
 - g) Accept any gift or favour that could be construed as being given in anticipation of, or in recognition for, the disclosure of Personal Information.

Accountability

9. Stakeholders must comply with this Policy when collecting, using and/or disclosing Personal Information on behalf of Swim Alberta or in the course of their relationship with Swim Alberta.
10. The Privacy Officer is responsible for the implementation of this Policy and monitoring information collection and data security, and ensuring that all staff receives 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:

Swim Alberta
11759 Groat Road
Edmonton, Alberta
T5M 3K6

Telephone: 780.415.1780

Fax: 780.415.1788

11. Duties – The Privacy Officer will:

- a) Implement procedures to protect personal information;
- b) Establish procedures to receive and respond to complaints and inquiries;
- c) Take steps to contractually obligate third party providers to comply with applicable privacy legislation and this Policy when such providers are processing Personal Information provided by Swim Alberta; and
- d) Train and communicate to staff information about Swim Alberta's privacy policies and practices.

Identifying Purposes

12. Swim Alberta collects, uses and discloses Personal Information only for purposes that a reasonable person would consider appropriate in light of the circumstances.
13. Swim Alberta will identify the purposes for which Personal Information is collected, used or disclosed at or before the time such information is collected, used or disclosed. Unless an exception to consent exists in applicable privacy laws, Personal Information will only be collected, used or disclosed with the Member's consent, which may be express or implied depending on the level of sensitivity of the information.
14. Swim Alberta Stakeholders may collect and use Personal Information from Members and prospective Members for purposes that include, but are not limited to:

Communications

- a) Sending communications in the form of e-news or a newsletter with content related to Swim Alberta programs, events, activities, discipline, appeals and other pertinent information.
- b) Publishing articles, media relations and postings on the Swim Alberta website, displays or posters.
- c) Award nominations, biographies, and media relations.
- d) Communication within and between committees, volunteers and Board members.
- e) Discipline decisions and long term suspension list.
- f) Communications with applicable municipalities who wish to check residency status of individuals.

Registration, Database Entry and Monitoring

- a) Registration and communication of competitions, programs, events and activities.
- b) Database entry at the Coaching Association of Canada and to determine level of coaching certification coaching qualifications and coach selection.
- c) Database entry and communication to determine level of officiating certification and qualifications.
- d) Determination of eligibility, age group and appropriate level of training/competition.
- e) Registration, outfitting uniforms, and various components of athlete and team selection.
- f) Technical monitoring, officials training, educational purposes, sport promotion, media publications.

Sales, Promotions and Merchandising

- g) Purchasing equipment, coaching manuals, resources and other products.
- h) Promotion and sale of merchandise.

General

- i) Travel arrangement and administration.
 - j) Implementation of the Swim Alberta Screening Policy and Coach Registration and Minimum Requirements Policy.
 - k) Medical emergency, emergency contacts or reports relating to medical or emergency issues.
 - l) Determination of membership demographics and program wants and needs.
 - m) Managing insurance claims and insurance investigations.
 - n) Video recording and photography for personal use, and not commercial gain, by spectators, parents and friends.
 - o) Video recording and photography for promotional use, marketing and advertising by Swim Alberta.
 - p) Payroll, honorariums, company insurance and health plans.
15. Swim Alberta Stakeholders may collect Personal Information from Members and prospective Members for other purposes as permitted or required by applicable law.
16. Swim Alberta may share Personal Information for employment-related purposes such as through its use of third party payroll and benefits providers.
17. Swim Alberta may also share information with Swimming Canada for purposes outlined above in section 14.

Automatically Obtained Information

18. Our servers collect and store information such as the IP address from which you access our websites, your browser type, the date and time you accessed the site, the internet address of the website that you came from, and cookie information as further described below.

Cookies

19. A cookie is a file that is written to your hard drive when you access a website. We use cookies to improve user experience, personalize your access to content of our websites to your interests, ensure data security and understand general traffic patterns. This information may be used to guide enhancements in site structure. It may also be used to evaluate the effectiveness of a program or publication.
20. Information collected includes, but is not limited to, data to track frequency of visits, pages visited, web browser used, and city of web visitor. This data is collected on an anonymous basis wherever possible.
21. Swim Alberta tracks its website usage via Google Analytics to help inform its programming and marketing activities. If you wish to be excluded from Google Analytics data collection, you can download its Opt-Out Browser Add-On, which is accessible here: <https://tools.google.com/dlpage/gaoptout>.
22. We note that Google owns and operates data centers around the world. To find out more about Google's data center locations, please see <https://www.google.com/about/datacenters/inside/locations/index.html>.

Consent

23. By providing Personal Information to Swim Alberta, Members are providing their implied consent to the use of that Personal Information for the purposes identified in the **Identifying Purposes** section of this Policy, or for such other purposes identified at the time of collection of the Personal Information.
24. In determining whether to obtain written consent, Swim Alberta will take into account the sensitivity of the Personal Information, as well the Members' reasonable expectations. Following are examples of how Members may consent to the collection, use and/or disclosure of Personal Information:
 - a) Completing and/or signing an application form
 - b) Checking a check box, or selecting an option (such as 'Yes' or 'I agree')
 - c) Providing written consent either physically or electronically
 - d) Consenting orally in person
 - e) Consenting orally over the phone
 - f) Voluntarily providing Personal Information in person, over the phone or electronically
25. Swim Alberta will not, as a condition of providing a product or service, require Members to consent to the use, collection, or disclosure of Personal Information beyond what is required to fulfill the specified purpose of the product or service.
26. A Member may withdraw consent in writing, at any time, subject to legal or contractual restrictions. Swim Alberta will inform the Member of the implications of withdrawing consent.
27. Swim Alberta will not obtain consent from Members who are minors, seriously ill, or mentally incapacitated. Consent from these individuals will be obtained from a parent, legal guardian, or a person having power of attorney.
28. There are situations where Swim Alberta may not be required to obtain consent for the collection, use or disclosure of Personal Information, and may use or disclose Personal Information without the Member's knowledge or consent. Examples (without limitation) of such situations include:
 - a) It is clearly in the Member's interests and the opportunity for obtaining consent is not available in a timely way.
 - b) Knowledge and consent would compromise the availability or accuracy of the Personal Information and collection is required to investigate a breach of an agreement or a contravention of a federal or provincial law.
 - c) An emergency threatens a Member's life, health, or security.

- d) The information is publicly available.
- e) As permitted or required by applicable privacy legislation.

Accuracy, Retention, and Openness

- 29. We aim for Personal Information to be as accurate, complete, and as up-to-date as is necessary for the purposes for which it will be used. We need your assistance in meeting this goal. Please contact our Privacy Officer to update your Personal Information.
- 30. Personal Information will be retained only as long as reasonably necessary for the purpose it was collected, to enable participation in Swim Alberta programs, events, and activities, and to comply with data retention periods as may be required by applicable law.
- 31. Swim Alberta Stakeholders are required to comply with this Policy and will be made aware of the importance of maintaining the confidentiality of Personal Information.
- 32. Swim Alberta protects Personal Information against such risks as loss, theft, unauthorized access, disclosure, copying, use, or modification through appropriate security safeguards appropriate to the sensitivity of the Personal Information. The Company cautions that, while we endeavor to secure Personal Information in our control, no network, system or server is 100% secure.
- 33. Swim Alberta will make the following information available to Members:
 - a) This *Privacy Policy*
 - b) Any additional documentation that further explains Swim Alberta's *Privacy Policy*
 - c) The name or title, and the address, of the person who is accountable for Swim Alberta's *Privacy Policy*
 - d) The means of gaining access to Personal Information held by Swim Alberta
 - e) A description of the type of Personal Information held by Swim Alberta, including a general account of its use
 - f) Identification of any third parties to which Personal Information is made available

Access

- 34. Upon written request, and with assistance from Swim Alberta after confirming the Member's identity, Members may be informed of the existence, use, and disclosure of their Personal Information and will be given access to that Personal Information, subject to restrictions as set out in applicable privacy legislation.
- 35. Unless there are reasonable grounds to extend the time limit, access requests will be responded to within thirty (30) days of receipt of the written request, at no cost to the Member.
- 36. If Swim Alberta refuses a request for Personal Information, it shall inform the Member the reasons for the refusal.

Complaints

- 37. Any privacy-related complaints should be directed to the Privacy Officer.

Website Copyright and Legal Disclaimer

- 38. This website is created and controlled by Swim Alberta in the province of Alberta and as such, the laws of the province of Alberta will govern these disclaimers, terms, and conditions.

39. This website is a product of Swim Alberta. The information on this website is provided as a resource to those interested in Swim Alberta. Swim Alberta disclaims any representation or warranty, express, or implied, concerning the accuracy, completeness, or fitness for a particular purpose of the information. Persons accessing this information assume full responsibility for the use of the information and understand and agree that Swim Alberta is not responsible or liable for any claim, loss, or damage arising from the use of this information. Reference to specific products, processes, or services does not constitute or imply recommendation or endorsement by Swim Alberta. Swim Alberta reserves the right to make changes to this website at any time without notice.
40. Links made available through this website may allow you to leave the Swim Alberta site. Please be aware that the internet sites available through these links are not under the control of Swim Alberta. Therefore, Swim Alberta does not make any representation to you about these sites or the materials available there. Swim Alberta is providing these links only as a convenience to you, and in no way guarantees these links and the material available there. Other websites are governed by privacy policies and practices that may differ significantly from those of Swim Alberta. We strongly recommend that you review the privacy policies and practices applicable to personal information collected through a linked website before submitting any personal information. Swim Alberta is not responsible for privacy practices employed by other companies or websites.

Revisions

41. Swim Alberta may make changes to this Policy from time to time to reflect changes in its legal or regulatory obligations or the manner in which it deals with Personal Information.