

BADMINTON ONTARIO

Privacy Policy – October 2016

1. OBJECTIVE

1.1. The intent of the Badminton Ontario (BON) Privacy Policy is to help individuals understand how their personal information is managed at Badminton Ontario.

1.2. This Policy is designed to comply with applicable privacy legislation in Ontario and in Canada and to be consistent with the stated values of Badminton Ontario

2. FIELD OF APPLICATION

2.1. This Policy applies to, but is not limited to, all Members, Supporters, Honourary Supporters and employees of Badminton Ontario, and any other individual whose personal information is managed at Badminton Ontario.

2.2. This Policy applies only to personal information collected by Badminton Ontario during the course of Badminton Ontario related activities.

2.3. Should this Policy not address a specific situation, individuals are expected to contact the Badminton Ontario President for guidance or clarification.

2.4. This Policy may be modified by specific terms in the form of any agreement entered into between a Member or a Club and any Participant.

3. DEFINITIONS

3.1. Any reference to “By-Laws” is a reference to the Badminton Ontario By-Laws. The term “by-laws” refers to by-laws in place for any Member or Club.

3.2. The terms “Member”, “Supporter” and “Honourary Supporter” have the meanings described in the By-Laws. In this Policy, these individuals, together with any other individual whose personal information is managed at Badminton Ontario are collectively referred to as “Participants.”

3.3. The term “Member” has the meaning described in the Badminton Ontario By-Laws, referring to those 7 District associations.

3.4. This Policy also in places refers to these entities, who are not individuals, whose information is subject to this Policy:

3.4.1. Partner: An organization with which Badminton Ontario would work in conjunction in conducting the business of the organization or the management of the sport activities (e.g. Badminton Canada, CSIO, etc).

3.4.2. Sponsor: An organization or company with which Badminton Ontario forms a contractual agreement for financial support or goods for programs.

3.4.3. Funders: A governmental, quasi-governmental or non-governmental non-profit organization which provides funding for high performance and sport programming.

3.4.4. Donors: Individuals, organizations and companies that donate funds or property to Badminton Ontario.

3.4.5. Clubs: An association of Participants with an affiliation to or membership in a Member of Badminton Ontario.

4. PRINCIPLES

4.1. The Badminton Ontario Privacy Policy is designed to comply with applicable privacy legislation in Canada. It incorporates the following principles:

- 4.1.1. Accountability
- 4.1.2. Identifying Purpose
- 4.1.3. Consent
- 4.1.4. Limiting Collection
- 4.1.5. Limiting Use, Disclosure and Retention
- 4.1.6. Accuracy of Personal Information
- 4.1.7. Safeguarding Personal Information
- 4.1.8. Openness
- 4.1.9. Access to Personal Information
- 4.1.10. Challenging Compliance
- 4.1.11. Prudent Information Retention

4.2. If changes to the Policy are required in the future, those changes will be provided in writing through updates to this Privacy Policy and communicated according to Section 8 of this Policy.

4.3. It is Badminton Ontario's intent that Participants will always know what information it collects, how Badminton Ontario uses it and how Badminton Ontario protects it.

4.4. When personal information that has been collected is to be used for a purpose not previously identified, the new purpose will be identified to the specific Participant or to the group of which that Participant is a member prior to use and consent sought for that use.

5. POLICY STATEMENT

5.1. Badminton Ontario is committed to taking all reasonable steps to protect the privacy of the personal information of Participants from whom it collects personal information for the conduct of Badminton Ontario activities.

6. PROVISIONS

6.1. Accountability

6.1.1. Badminton Ontario is responsible for maintaining and protecting the personal information under its control. Accountability for this function within the organization is held by:

President

Badminton Ontario

3 Concorde Gate - Suite 209, Toronto, ON M3C 3N7

6.2. Identifying Purpose

6.2.1. Badminton Ontario will in this Policy or otherwise identify to an Participant the purposes for which personal information is collected at or before the time the information is collected.

6.2.2. In addition to any other specified purpose identified at that time, Badminton Ontario collects personal information for the following purposes:

6.2.2.1. registration of Members as defined in the By-Laws and calculation and collection of any fees or charges associated with that;

6.2.2.2. registration of Participants in Ontario including athletes, coaches, officials, supporters, as defined in the By-Laws and the calculation and collection of any fees or charges associated with that;

6.2.2.3. to process registrations for competition or other events or activities affiliated with or sanctioned under Badminton Canada, and running reports to capture Participant numbers and activities and provide aggregated (non-identifying) information and reports to Funders, Sponsors, Partners and Donors and to the media and community generally;

6.2.2.4. to appoint a Participant to a team or group of Participants representing Badminton Ontario or being funded by Badminton Ontario, Badminton Canada or any other funding body working with or providing support to Badminton Ontario, and for the programs and operations of that team or group of Participants;

6.2.2.5. to enable coaches and other professionals to provide coaching, support and assistance to Participants;

6.2.2.6. to manage and develop Badminton Ontario's business and operations, including but not limited to personnel and employment matters and affairs with Partners, Funders and Sponsors;

6.2.2.7. to determine an Participant's entitlement to Badminton Ontario's services or that Participant's status with Badminton Ontario or one of its Members or Clubs;

6.2.2.8. to inform Participants about programs, activities and services Badminton Ontario or one of its Members or Clubs that are believed to be of potential interest or value to them;

6.2.2.9. to better understand a Participant's interests in Badminton Ontario's products, activities and services or those of its Members or Clubs;

6.2.2.10. to develop, enhance or improve programs, activities and services to better meet the needs of Participants, Badminton Ontario, Members and Clubs;

6.2.2.11. to report to Sponsors, Partners, Funders and Donors as may be necessary, in aggregate, non-identifiable terms (excepts as concerns Participants in national teams or groups);

6.2.2.12. to permit Members and Clubs to manage their membership lists and carry out their respective operations and activities in a fashion consistent with this

Policy and on a basis that provides for compliance with the principles in this Policy;

6.2.2.13. to meet legal and regulatory requirements;

6.2.2.14. to meet the requirements of prudent information retention practices; and

6.2.2.15. to address specific circumstances that require such information to be collected and used as necessary or as appropriate.

6.2.3. Badminton Ontario collects or may collect the following personal information from individuals during the course of normal activities and for membership management:

6.2.3.1. participant number

6.2.3.2. previous Participant number

6.2.3.3. first name

6.2.3.4. middle name

6.2.3.5. last name

6.2.3.6. nickname

6.2.3.7. title or rank

6.2.3.8. function or status as a Participant

6.2.3.9. gender

6.2.3.10. language preference

6.2.3.11. birth date

6.2.3.12. address

6.2.3.13. phone number(s)

6.2.3.14. e-mail address

6.2.3.15. mother's name

6.2.3.16. father's name

6.2.3.17. mother's e-mail

6.2.3.18. father's e-mail

6.2.3.19. mother's phone number(s)

6.2.3.20. father's phone number(s)

6.2.3.21. mother's address

6.2.3.22. father's address

6.2.3.23. legal Guardian's name, email, phone number and address, if other than Mother or Father

(items 6.2.3.15 to 6.2.3.23 apply on to those Participants who have not yet reached their 18th birthday on July 1 of the registration year in the information is collected)

6.2.3.24. business contact information

- 6.2.3.25. ethnicity/race (self-identify, optional)
- 6.2.3.26. special needs/disability (self-identify, optional)
- 6.2.3.27. gender identity (self-identify, optional)
- 6.2.3.28. health or medical concerns or circumstances relevant to their activities as a Participant¹
- 6.2.3.29. Provincial Health Information Number
- 6.2.3.30. for employees of Badminton Ontario, salary, education, work experience and other typical human resources information;
- 6.2.3.31. for volunteers of Badminton Ontario, information on training, education, work experience, volunteer experience and qualifications, and information on expenses and reimbursement of those expenses;
- 6.2.3.32. information concerning financial support of a Participant by Badminton Ontario or by a Member, Club, Donor, Sponsor, Funder or Partner;
- 6.2.3.33. Competition results, as well as information about training programs, testing results and other typical training information;
- 6.2.3.34. documents and their information provided to Badminton Ontario, a Member of a Club, including:
 - 6.2.3.34.1. Code of Conduct Agreement
 - 6.2.3.34.2. Waiver (e.g. Liability Waiver, Photo Release)
 - 6.2.3.34.3. images in photography, audio, film or video
 - 6.2.3.34.4. health and medical disclosure documents
 - 6.2.3.34.5. in limited circumstances where identified as confidential, conflict of interest information

¹ All health or medical information is confidential and will be treated as such. Badminton Ontario respects that some health or medical matters are particularly sensitive. Participants are encouraged to provide all such information that could be relevant to their activities as a Participant. As and when that is provided to Badminton Ontario, Participants should specifically identify such information.

6.2.4. Additional information obtained may include levels of interest for programs, activities, services and topics provided by Badminton Ontario, a Member or a Club, and transaction activity with Badminton Ontario.

6.2.5. Credit card information or banking information may be collected and utilized for payment transactions for registration and other financial transactions only. This information will not be stored.

6.2.6. Badminton Ontario collects and stores information through web servers based in Canada. This information may be used for the purposes identified in this policy. From time to time, and only if and to the extent necessary, personal information is shared through email or web-based means that are transmitted through facilities and servers outside of Canada.

6.2.7. Badminton Ontario's website (www.badmintonontario.ca) use cookies. A cookie is a small piece of information that is sent to a user's computer when he or she accesses a Web site. Badminton Ontario utilizes a session cookie which is stored temporarily in a user's computer's memory and allows him or her to remain logged in while using the website – i.e. a user is not required to continuously log in as one navigates the pages on

the website because these cookies are used. A session cookie is destroyed as soon as a user closes his or her browser.

6.3. Consent

6.3.1. A Participant's knowledge and consent are required before Badminton Ontario is allowed to collect, use or disclose his or her personal information.

6.3.2. Where possible, Badminton Ontario will obtain consent directly from the Participant concerned at the time of collection.

6.3.3. A Participant has the right to withdraw consent at any time by providing reasonable notice to the Badminton Ontario President. If a request to withdraw consent requires that Badminton Ontario delete an individual's registration information, Badminton Ontario will no longer be able to provide the programs, services or products for which an individual has subscribed, and that individual may no longer be able to retain his or her status as a participant or volunteer of Badminton Ontario, or affiliated with a Member or Club.

Cancellation will be subject to the terms and conditions of the registration or services provided, as applicable, and subject to the terms of this Policy.

6.3.4. On the withdrawal of consent by a Participant, Badminton Ontario will remove historical information (eg. posted results of competitions, photos) only so far as doing so is within its control and only on a best-efforts basis. Some personal information of the Participant will remain in the records of Badminton Ontario so long as required by the prudent information retention practices of Badminton Ontario.

6.3.5. By registering in or by allowing themselves to be registered in Badminton Ontario through the Database, or subscribing to any reports or services, by providing personal information to Badminton Ontario, or otherwise indicating approval, individuals consent to the collection and use of their personal information for the purposes identified in this Privacy Policy. For these purposes, the provision of information to Badminton Ontario by a Member constitutes consent on behalf of the Participant whose information is provided.

6.3.6. By registering as a Participant or allowing themselves to be registered as a Participant with Badminton Ontario an individual acknowledges that participating in badminton activities as a player, coach, official or in any other capacity is to a very large extent a public matter and consents to photography, videotaping and filming, and the use of that by Badminton Ontario in the course of its activities.

6.3.7. Badminton Ontario will not require an individual to consent to the collection, use or disclosure of personal information beyond that required to provide products, programs, activities or services of or sanctioned by Badminton Ontario, its Members or Clubs.

6.3.8. Badminton Ontario may use or disclose personal information without the knowledge or consent of the individual as required by governmental bodies acting with authority, or as authorized or required by applicable legislation or other law.

6.4 Limiting Collection

6.4.1. Badminton Ontario collects only the information that is necessary for the purposes outlined in this Privacy Policy.

6.5. Limiting Use, Disclosure and Retention

6.5.1. Badminton Ontario does not use personal information for purposes other than those for which it was collected, except with an Participant's consent or as required by law.

6.5.2. Once personal information is no longer required to fulfill the identified purposes (including prudent information retention practices) or other legal requirements, it will be destroyed, deleted or made anonymous.

6.5.3. Badminton Ontario sometimes uses the services of external firms to assist in communicating with Participants (e.g., surveys and mail distribution) or as a means of providing more effective and efficient services to these Participants (e.g., technology support). External suppliers and contractors are contractually obligated to keep the information confidential, to use the information only for the purpose requested and to destroy the information when it is no longer required.

6.5.4. Personal information is shared with external service providers only to the extent required for the provision of such services. Furthermore, Badminton Ontario does not sell personal information to a third-party organization. External service providers are required to keep the information confidential, to use the information only for the purpose requested and to destroy the information when it is no longer required.

6.5.5. In certain circumstances, Badminton Ontario allows basic contact information of Participants to be shared amongst staff and volunteers who are Participants under this Policy. Examples of this include providing player lists for competitions to other participants or sharing contact information amongst members of the Badminton Ontario administrative networks, Boards of Directors and staff, or committees to facilitate ongoing communication. This Policy requires that such Participants use that information exclusively for carrying out the activities of Badminton Ontario or a Member or a Club, and not for any other personal or business reason.

6.5.6. Personal information is retained only as long as necessary for the fulfillment of the purposes stated in this policy.

6.5.7. Personal information collected through the Database will be used by system administrators in Club, Member and Badminton Ontario to register players and volunteers, and to process registrations for competition and other activities, to generate reports to funders, to generate statistical reports and to capture Participant numbers.

6.5.8. Personal information collected through the Database will be used by Badminton Ontario and its service-providers to communicate information and news relevant to Participants, including the events and activities of Badminton Ontario, its Members and clubs, and Partners, Funders and Sponsors.

6.5.9. Personal information may be provided to designated staff and Directors of Clubs, Members and Badminton Ontario as necessary and appropriate, and who agree by this Policy to use it only for the purposes identified in this Privacy Policy or otherwise consented to by the Participant.

6.6. Accuracy of Personal Information

6.6.1. Personal information is kept as accurate, complete and up to date as necessary for the purposes for which it is to be used. Participants are encouraged to provide updates to their personal information as changes occur, to enable continued service from Badminton Ontario

6.6.2. The personal information of Participants registered with Badminton Ontario can be reviewed and modified either directly on-line or by contacting the Badminton Ontario web site administrator.

Web Services

Badminton Ontario, 3 Concorde Gate - Suite 209, Toronto, ON M3C 3N7

6.6.3. For the purposes of 6.6.2, a Participant is not entitled to review information about himself or herself if it constitutes qualitative, assessment or opinion information by Badminton Ontario, a Member or a Club generated for the purposes of decision-making, including decision-making concerning:

6.6.3.1. a Player's selection to a team or program or a recommendation pertaining to that Player for funding or other financial support;

6.6.3.2. a Participant's election to a board or appointment to a Committee;

6.6.3.3. a change in a Participant's official level, or the selection of an official for a particular event or activity; and

6.6.3.4. Any sanction considered for a Participant under the By-Laws, a Member's by-laws or Club's by-laws, under any applicable code of conduct or policy concerning conduct, or under any rules of competition.

6.7. Safeguarding Personal Information

6.7.1. Badminton Ontario will safeguard personal information, whatever its form, by means appropriate to the sensitivity of the information. The safeguards will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. The measures of protection include:

6.7.1.1. physical measures, for example, locking filing cabinets and restricted access to offices;

6.7.1.2. organizational measures, for example, limiting access to the personal information on a "need-to-know" basis;

6.7.1.3. technological measures, for example, the use of passwords and encryption; and

6.7.1.4. procedural measures, for example, the shredding of sensitive personal information when applicable.

6.8. Openness

6.8.1. Badminton Ontario is committed to being open about its policies and practices with respect to the handling of personal information.

6.8.2. the Privacy Policy is available on the Badminton Ontario Website.

6.8.3. if additional information is required, requests for such information may be made to the Badminton Ontario President.

6.9. Access to Personal Information

6.9.1. individuals may request a copy of their personal information held at Badminton Ontario by submitting a written request to the President at the address above..

6.9.2. for the purposes of 6.9.1, a Participant is not entitled to review information about himself or herself if it constitutes qualitative, assessment or opinion information by Badminton Ontario, a Member or a Club generated for the purposes of decision-making, including decision-making concerning:

6.9.2.1. a Player's selection to a team or program or a recommendation pertaining to that Player for funding or other financial support;

6.9.2.2. a Participant's election to a board or appointment to a Committee;

6.9.2.3. a change in a Participant's official level, or the selection of an official for a particular event or activity; and

6.9.2.4. any sanction considered for a Participant under the By-Laws, a Member's by-laws or Club's by-laws, under any applicable code of conduct or policy concerning conduct, or under any rules of competition.

6.9.3. acceptable proof of identification is required before such information is provided.

6.9.4. if the information is inaccurate, an individual may request that it be reviewed and, if inaccurate, changed, by contacting the Badminton Ontario President.

6.10. Challenging Compliance

6.10.1. an individual can challenge compliance with the above policy by providing written details of the challenge to the Badminton Ontario President

7. REVIEW AND APPROVAL

7.1. The Badminton Ontario Board of Directors shall review this policy biennially.

7.2. This Policy and any amendments to it require approval by the Board of Directors prior to its coming into force.

8. COMMUNICATION OF THE POLICY

8.1. The Privacy Policy will be posted in the Policies section of the Badminton Ontario Website.

8.2. A copy of the Policy will be distributed to Members and to National Team Representatives, to Committee Chairs, to Staff and to Member administrators.