



OTTAWA TFC*

PRIVACY POLICY

INTRODUCTION

Ottawa TFC collects, uses, retains, safeguards, discloses and disposes of Personal Information in a manner that recognizes the right to privacy of Individuals with respect to their Personal Information. This policy sets out how Ottawa TFC will meet its obligations under the *Personal Information Protection and Electronics Documents Act* (PIPEDA).

POLICY

Ottawa TFC will collect, use, retain, safeguard, disclose and dispose of Personal Information in compliance with PIPEDA. Ottawa TFC will protect the privacy of Individuals with respect to Personal Information in its custody and control, including that of its contractors and business partners. Ottawa TFC recognizes that effective systems and measures to protect such Personal Information are important to safeguarding the interests of its players, parents/guardians, coaches, volunteers, employees, members, directors, suppliers, and officials and other individuals who share their Personal Information with Ottawa TFC.

Ottawa TFC will manage its Personal Information holdings in a responsible and business-like manner and will control the collection and accuracy of Personal Information, protecting it from unauthorized use, disclosure, and retention.

DEFINITIONS

“Individual” means a person, and includes players, parents/guardians, coaches, volunteers, employees, prospective members, members, director, suppliers, and official of Ottawa TFC but does not include such legal persons as corporations.

“Personal information” - any information about an identifiable Individual and may include information relating to their personal characteristics including, but not limited to, gender, age, income, home address or phone number, ethnic background, family status, health history and health conditions, social insurance number, education, fitness results, credit card or banking information, date of birth, athlete history, birth certificate, performance results, certifications, awards, height, weight, uniform size, shoe size, feedback from coaches and trainers, video footage, photographs, criminal records and background checks, reference checks, beneficiaries, passport information, and discipline information. Personal Information does not include business information such as an Individual's business address and telephone, which is not protected by PIPEDA.

*CUSC operating as Ottawa TFC



GUIDELINES

1 - ACCOUNTABILITY

Privacy Officer - the General Manager of Ottawa TFC is responsible for the implementation of this policy and monitoring information collection and data security and ensuring that all staff receive appropriate training on privacy issues and their relevant responsibilities in this regard. The Privacy Officer is responsible for Personal Information access requests and complaints. Ottawa TFC's Privacy Officer may be contacted as follows:

General Manager, Ottawa TFC
2075 Trim Road
Orleans, ON
K4A 3R2
gm@ottawatfc.com
613-573-7627

The Privacy Officer is responsible for:

1. implementing procedures to protect Personal Information,
2. establishing procedures to receive and respond to complaints and inquiries,
3. recording all persons having access to Personal Information,
4. ensuring third party providers abide by this policy; and
5. training and communicating Ottawa TFC's privacy policies and practices to all staff.

2 - IDENTIFYING PURPOSES, TYPE OF INFORMATION COLLECTED

Ottawa TFC will only collect information reasonably required to conduct its soccer programs. Access to Privacy policies and guidelines will be readily available. Processes to challenge Ottawa TFC's compliance and/or adherence to PIPEDA will be readily available and transparent.

Ottawa TFC collects Personal Information for the following purposes:

- Player Information: Player's name, address, date of birth is collected to determine player's geographical division and level of play. Historical information concerning past teams played for is collected in order to determine if any transfer regulations may apply. Names and information about player's parents/guardians, including name, address, telephone numbers, and email addresses are collected to facilitate emergency contact information.
- Player Medical Information: Medical information for players (including medical history, medication, doctor contact information) is collected for use in an emergency situation where a player may be injured, requiring medical assistance.



- Other member information: Personal Information such as email addresses, phone numbers, and mailing addresses is collected for purposes of providing information to members about Ottawa TFC such as Annual Meetings, fundraising events, parent/team meetings, tournaments, etc.
- Additional information that is collected from others such as coaches (their qualifications, education, and police checks), and referees (their qualifications, references, and police checks)

Personal information collected by Ottawa TFC is shared through databases with the Ontario Soccer and Canada Soccer, both of which are governed by PIPEDA and have safeguards in place to protect personal information. Further details on their privacy policies can be found at <http://www.ontariosoccer.net/> and <https://www.canadasoccer.com/privacy-policy-p145071>

Ottawa TFC does not collect, use or disclose IP addresses, except as may be required under section 5 of this Policy.

Ottawa TFC does not use cookies to identify specific Individuals.

3 - **CONSENT**

Ottawa TFC will use Personal Information as set out in section 2 above. By providing this information to Ottawa TFC, Individuals are deemed to consent to the use of this information for the purposes set out in section 2 above.

Any Individual may withdraw their consent to the use of their Personal Information by providing a written request to Ottawa TFC's privacy officer. Such requests must be given with one week's notice of such withdrawal. Ottawa TFC will inform the Individual of the implications of such withdrawal.

4 - **LIMITING COLLECTION**

All information will be collected fairly and lawfully within the criteria set out in this Policy. Ottawa TFC will not collect unnecessary information and will limit the amount and type of information collected to that which is required to fulfill its identified purposes.

5 - **LIMITING USE, DISCLOSURE AND RETENTION**

- Use: Ottawa TFC will limit the use of Personal Information it collects to that set forth in sections 2 and 3 above.
- Disclosure: Ottawa TFC may disclose Personal Information to a government authority that has asserted its lawful authority to obtain the information such as an investigation



of an unlawful activity, or to comply with a subpoena or warrant or an order made by the court, person, or body with jurisdiction to compel the production of the information or otherwise as permitted by applicable law.

Ottawa TFC may at its discretion release Personal Information for the purposes of collecting debts which may be owed to Ottawa TFC.

Ottawa TFC may disclose Personal Information to act in an emergency that threatens the life, health or security of an Individual.

- Retention:

Ottawa TFC will retain Personal Information indefinitely unless requested otherwise by an Individual.

6 - ACCURACY

Ottawa TFC will strive to ensure that Personal Information is maintained in an accurate manner in order to minimize the possibility that inappropriate information may be used to make a decision about an Individual.

7 - SAFEGUARDS

Personal Information will be protected by appropriate security safeguards to ensure the information is protected from theft, unauthorized access, disclosure, copying, use or modification. Employees of Ottawa TFC understand their responsibilities regarding the importance of maintaining the confidentiality of Personal Information. Methods of protection will include locked filing cabinets, offices and storage areas, background checks on employees, and access control methods for computers including passwords, encryption, etc.

8 - OPENNESS

Ottawa TFC will ensure this Policy, containing the name and contact information of its Privacy Officer, is posted on its website.

9 - INDIVIDUAL ACCESS

Upon written request, an Individual may request information regarding the existence, use and disclosure of their Personal Information and will be given access to that information. Requested information will be disclosed to the Individual within 30 days of receipt of the written request at no cost to the Individual. An Individual may be denied access to their Personal Information if the information contains references to other Individuals, cannot be disclosed for legal, security or commercial proprietary purposes, or the information is subject to solicitor-client or litigation privilege.



10 - **CHALLENGING COMPLIANCE**

Individuals can challenge Ottawa TFC's compliance with PIPEDA. Ottawa TFC will put in place simple and easy to access procedures for the resolution of such challenges/grievances under the administration of this Policy. Ottawa TFC will investigate all complaints. If complaints are founded, Ottawa TFC will take appropriate steps to ensure that compliance is achieved and will make appropriate changes, if necessary, to its internal processes.

All complaints under this Policy should be directed to Ottawa TFC's Privacy Officer at gm@ottawatfc.com.