## PFCPOL-18 CONFIDENTIALITY and PRIVACY POLICY

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## **Related Policies**

PFCPOL-20 - Social Media & Website Policy

PFCPOL-21 - Complaints and Dispute Resolution Policy

In connection with its operation of soccer programs and its soccer camps and related activities, Pickering Football Club engages in the collection of personal information. The personal information collected is largely that of children, who are the vast majority of participants in these activities, although personal information of team officials, parents and others who are not employees is also collected. The information is collected to identify children, place them by age and gender in appropriate teams, communicate with children and their parents, coaches and managers regarding team activities, facilitate their participation in outside soccer events, and register them as required with Ontario Soccer.

The Personal Information Protection and Electronic Documents Act (PIPEDA) and the Canadian Anti-Spam Legislation requires that rules with respect to the protection of personal information be established by organizations such as the Club. We consider this an important goal, particularly in connection with participants in our programs who are children. As such, the following rules will apply:

- 1. All personal information, especially with respect to children, will be kept strictly confidential. The only personal information to be collected in connection with team registration will be the child's name, address, telephone number, gender, age and parental contact information, including email address. For team officials, the information will consist of name, address, telephone number, gender, age and email address, and certification information, as applicable. In addition, team officials are authorized by the Club to request and collect health card information for children on their respective teams, for the current season only, to be used only in the case of a medical emergency, if and when a parent or quardian is not present.
- 2. Personal information of children and team officials shall be maintained in hard copy in the Club office, and on Club computers by members of the Club's paid staff or volunteers. The office is to be kept locked when staff is not present. Archives of data files obtained from Ontario Soccer and/or information from online registration will be maintained only by Club office staff. Stored shared files with restricted access to staff only. Third parties shall not be utilized for these functions. Information shall not be stored in vehicles or other insecure locations.
- 3. Staff and/or members of the Board of Directors may have personal information related to the current season's players at home in hard copy or on personal home computers to facilitate initial team organization only, as may team officials, for the duration of the current season only. Players' personal information is to be deleted from the home computers referred to above at the end of the current season, without the retention of copies, whether computerized or hard copy. All documentation containing personal information with respect to players is to be returned at the end of the season to the Club office for shredding, except that mailing list information from previous years shall be maintained by Club office staff to facilitate continuing Club participation by players. There are no exceptions to these rules.
- 4. Personal information with respect to children is not to be shared with any outside club, organization, person, or entity, and in particular, commercial organizations, without the express written consent of parents, or players over 18, and of the Board of Directors. However, the Board of Directors hereby expressly consents to team officials providing the names, addresses, ages and gender of players to (a) other clubs, to facilitate their participation in tournaments (or an inter-club league), provided that the player's parents (or the player, if over 18 years of age) consents, and (b) Ontario Soccer, to maintain player registration.
- 5. Contact information, including children's names, parent's names, email addresses and telephone numbers, coaches' names, email addresses and telephone numbers, may be shared by team officials within a team for the purpose of facilitating transportation to games, practices and tournaments. Other personal information, especially with respect to children, shall not form part of this communication.
- 6. Personal information regarding medical conditions, in particular, is to be kept strictly confidential, and shall not be communicated to anyone by the person receiving such information from the parent or player without the express written consent of the parent (or player, if over 18 years of age). Club office staff is not to provide personal information regarding a player to any person, other than a team officials who has a reasonable need to contact the parent of a child on his or her or other team. When in doubt, Club office staff should direct such inquiries to the Executive or President.

- 7. Any parent (or player, if over 18 years of age) is entitled to know of the existence, use and disclosure of his or her personal information and that of his or her child, and to amend incorrect information, upon request. This entitlement is subject, however, to superseding court orders. Custodial parents with court orders which have or may have the effect of precluding the other parent from having or amending such information are required to file a copy of the order with the Club office.
- 8. In accordance with statute and upon proper request, PFC is required to provide, a list of members to a member, or a member's attorney or legal representative. The list may only be used in connection with
  - (a) an effort to influence the voting of members;
  - (b) requisitioning a meeting of the members; or
  - (c) another matter relating to the affairs of the corporation.
- 9. Only with express consent does Pickering Football Club photograph and/or record children's images and/or voices on still or motion picture film and/or audio tape. The use of this material is restricted to the promotion of soccer through the media of newsletters, websites, television, film, radio, print and/or display form. PFC may use team or individual pictures and will only publish a child's first name and last initial for publications/events run by the PFC when the child is under the age of 18. Parents/Guardians may withdraw consent from this arrangement at any time.
  - PFC is NOT responsible for the prevention of individual photography or videography or any other form of recording during soccer activities.
- 10. All inquiries, requests, and/or complaints regarding personal information and privacy issues, including photography/videography shall be directed, in writing, to the President who shall be the Club's Privacy Officer at privacy@pickeringfc.ca.