



July 16, 2020

## **PRIVACY POLICY**

### **Background**

The Ontario Provincial Football League provides these services to its members and the public:

The Ontario Provincial Football League's mission is,

1. To promote and encourage the game of youth community football, for tackle, touch and flag groups and in connection therewith to encourage improvement in physical, educational and scholastic standings and standards
2. To promote and foster co-operation, sportsmanship, and good relationships between all member bodies playing youth football
3. To promote and foster co-operation and good relationships with the CFL, OFA, OUA, CIS, CJFL, all Junior and Senior Leagues, all High Schools and minor football organizations.
4. To provide the guidelines, structure and support for football played throughout Ontario.
5. Provide one league, tiered for all teams to play within their appropriate playing level to foster the development of players at all levels and promote the enjoyment the game.
6. To operate the league in a businesslike manner.
7. To conduct its affairs in accordance with the "Canadian Amateur Rule Book for Tackle Football" as established and amended from time to time by Football Canada.

### **Purpose of the Privacy Policy**

The Ontario Provincial Football League recognizes the importance of, and is committed to, maintaining the accuracy, confidentiality, and security of personal information.

The Ontario Provincial Football League has, as a result of and following the requirements of the federal Personal Information Protection and Electronic Documents Act (PIPEDA), developed this Privacy Policy for implementation commencing November 19, 2017.

The Personal Information Protection and Electronic Documents Act limits the collection, use, and disclosure of personal information:

An Act to support and promote electronic commerce by protecting personal information that is collected, used or disclosed in certain circumstances, by providing for the use of electronic means to communicate or record information or transactions and by amending the Canada Evidence Act, the Statutory Instruments Act and the Statute Revision Act.

This Privacy Policy describes the manner in which Ontario Provincial Football League shall adhere to all relevant legislative privacy requirements, referencing the 10 Canadian Standards Association (CSA) principles.

## **Personal Information**

Personal information is defined as information about an identifiable individual. Personal information includes that which relates to personal characteristics (e.g., age, gender, home address, phone number, ethnic background), health (e.g. health history, health conditions), or activities and views (e.g. religion, politics, opinions or evaluations). Personal information does not include business information (e.g. business address, business phone).

## **Scope**

The Ontario Provincial Football League's Privacy Policy sets out the principles and practices regarding the protection of personal information that is collected, used, or disclosed.

## **Principles**

### **ACCOUNTABILITY**

The Ontario Provincial Football League is responsible for personal information under its control. Furthermore, all Ontario Provincial Football League employees and volunteers who collect, maintain and/or use personal information are responsible for ensuring that the collection, use and disclosure of this information is carried out in accordance with this policy and relevant procedures. The Ontario Provincial Football League shall designate a Privacy Officer (League Secretary) to be accountable for the Ontario Provincial Football League's compliance with the Act.

1. The Privacy Officer shall implement, monitor, and ensure compliance of the Ontario Provincial Football League Privacy Policy.
2. The Privacy Officer shall respond to access requests in accordance with this Policy.
3. The Privacy Officer shall report to the President. Ultimate responsibility for Privacy issues shall reside with the Ontario Provincial Football League Executive Council.
4. The identity of the Privacy Officer shall be fully disclosed and publicly accessible. The Ontario Provincial Football League's Privacy Officer is Lina Machoun.

Privacy Officer (League Secretary)  
Ontario Provincial Football League  
830 Cataraqui Woods Drive

Kingston ON K7P 2P7

Email: [info@opfl.ca](mailto:info@opfl.ca)

5. The Privacy Officer shall ensure all personal information possessed by the Ontario Provincial Football League is managed in accordance with this Policy, including that which may be transferred to a third party.
6. The Privacy Officer shall ensure that third party organizations (such as, but not limited to, Insurance Carriers, Canadian Centre for Ethics in Sport, Coaching Association of Canada, Human Kinetics Publishing, Local Organizations, and Affiliate Members) that handle information on behalf of the Ontario Provincial Football League meet or exceed the standards of the Ontario Provincial Football League. Member Associations shall be mandated to adopt the Privacy Policy of the Ontario Provincial Football League or create their own with the proviso that it meets or exceeds that of the Ontario Provincial Football League.
7. The Privacy Officer shall ensure adherence to this Policy by training staff, developing critical pathways for complaints and/or inquiries, and designing security measures to protect personal information possessed by the Ontario Provincial Football League.

#### IDENTIFYING PURPOSES

The purpose for which personal information is collected shall be identified by the Ontario Provincial Football League at or before the time the information is collected.

1. The Ontario Provincial Football League shall only collect information pertinent to its Football Programming and services.
2. Privacy policies and procedures shall be made readily accessible and available.
3. Access to the challenge process regarding compliance and/or adherence to PIPEDA shall be made readily available.

#### TYPE OF INFORMATION COLLECTED

The Ontario Provincial Football League collects personal information from interested parties, typically its members, prospective members, coaches, officials, participants, administrators, volunteers, contractors, and vendors directly for the purposes of conducting Football Programming. This information may be obtained in person, by mail, over the phone/facsimile, by email or electronically through the Ontario Provincial Football League's web site.

Individuals provide the necessary information, as requested, based on their personal need. This information may include, but is not limited to:

1. Names, addresses, phone and fax numbers, and email addresses collected for the purposes of facilitating membership communication related to the Ontario Provincial Football League's upcoming events, programs, and activities.
2. Names, addresses, email addresses provided voluntarily by an individual who accesses secure areas of opftb.ca
3. Information pertaining to athletes:

- a. Names, addresses, phone and fax numbers, email addresses, dates of birth, and historical information (athlete biography and statistics) of players may be collected to determine eligibility, geographical, division of play (age group), level of play, and transfer information consistent with the Ontario Provincial Football League regulations.
  - b. Information concerning an individual's skill level and development, and feedback on programs may be collected to ensure present and future program success.
  - c. Personal health information including provincial health card numbers, allergies, emergency contact and past medical history for use in the case of medical emergency.
  - d. Body weight, mass and body fat index to monitor physical response to training and to maintain an appropriate weight for competition.
  - e. Athlete information including height, weight, uniform size, shoe size, feedback from coaches and trainers, performance results for athlete registration forms, outfitting uniforms, media relations, and various components of athlete and team selection.
  - f. Athlete whereabouts information including sport/discipline, training times and venues, training camp dates and locations, travel plans, competition schedule, and disability, if applicable, Canadian Centre for Ethics in Sport inquiries for the purposes of out-of-competition drug testing.
  - g. Emergency contact information such as the names, addresses, phone numbers, and email addresses of players' parents, and information regarding educational information, skill levels, ability, and health may be collected to ensure compliance with the Ontario Provincial Football League's residency regulations are that activities are carried out in a safe and secure environment.
4. The names, addresses, phone and fax numbers, email addresses of officials, coaches, and administrators may be collected to determine geographical, division of participation, and level of certification and coaching qualifications, are consistent with the Ontario Provincial Football League regulations.
  5. Passport numbers and Aeroplan/frequent flyer numbers for the purposes of arranging travel.
  6. Marketing information including attitudinal and demographic data on individual members to determine membership demographic structure and program wants and needs.
  7. Personal information collected for the purposes of football registrations may also be utilized for football specific research purposes, including but not necessarily limited to, football demographic research.
  8. Performance data, typical of football, may be collected for the purpose of promoting both the individual and contest.
  9. Names, addresses, phone and fax numbers, and email addresses for the purpose of providing insurance coverage, managing insurance claims and conducting insurance investigations.
  10. Personal information (such as credit card information) that is required to undertake the supply of services or products and payment for said services or products an individual has

requested in compliance with the law and regulatory requirements as part of normal business transactions and record keeping.

11. Personal information required to provide, administer, and manage the service, program, or product requested and as needed, and to provide information to third party suppliers (example: Human Kinetics Publishing), integral with the Ontario Provincial Football League's products and services.
12. Banking information, social insurance numbers, criminal records checks, personal reference information, and resumés required to administer the Ontario Provincial Football League's hiring policy.
13. Appeals and regulations challenges as well as information collected to defend the Ontario Provincial Football League against legal action brought against the Ontario Provincial Football League.
14. If a purpose has not been identified herein nor consent given for such purpose, the Ontario Provincial Football League shall seek consent from individuals. This consent shall be documented as to when and how it was received.

## CONSENT

The knowledge and consent of the individual are required for the collection, use or disclosure of personal information.

The Ontario Provincial Football League shall use personal information for only the specified uses. By consenting to provide information to the Ontario Provincial Football League, the individual is deemed to consent to the use of the information for the purposes of Football Programming and to disclosure of the information to other associated organizations for the same purpose.

1. In addition to using personal information for Football Programming purposes, the Ontario Provincial Football League may use personal information for the purposes of providing promotional opportunities or football specific communications and association updates. The Ontario Provincial Football League shall provide an opportunity for the member to consent to these opportunities during the registration process.
2. The Ontario Provincial Football League believes medical records, medical history and medical forms of the individual may be of assistance in an emergency situation and therefore the Ontario Provincial Football League may request them and consider receipt of this information as consent for its subsequent use in an emergency medical situation.
3. Individuals may decline to have their personal information collected, used, or disclosed for certain purposes. If at any time individuals wish to withdraw consent, they may do so by contacting the Privacy Officer. The Privacy Officer shall explain the impact of withdrawal on any services provided by the Ontario Provincial Football League.
  - a. Because football by its nature is a contact sport and injuries are to a certain extent inherent in the game, the Ontario Provincial Football League reserves the right to refuse participation for the safety and well-being of the individual and public interest should the necessary personal information required not be disclosed.

4. The Ontario Provincial Football League may collect personal information without consent where reasonable to do so and where permitted by law.

#### LIMITING COLLECTION

The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization.

1. All information shall be collected by fair and lawful means.
2. All documents obtaining personal information shall have a collection, use, and disclosure of personal information statement contained therein, such as:

#### THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

The Ontario Provincial Football League collects, uses, and discloses only such information from individuals as is required for the purpose of providing services or information to them, managing databases, conducting research and such other purposes as described in the Ontario Provincial Football League's Privacy Policy.

The Ontario Provincial Football League does not sell, trade, barter, or exchange for consideration any Personal Information obtained. The Ontario Provincial Football League's collection, use and disclosure of personal information shall be done in accordance with its Privacy Policy, a copy of which is available at [opfl.ca](http://opfl.ca).

3. The Ontario Provincial Football League shall not use any form of deception in gaining personal information from its members.
4. The Ontario Provincial Football League shall advise potential registration candidates, through its members or by reference to our web site at [opfl.ca](http://opfl.ca), of the purpose for the collection of the data requested at the time of registration.
5. The Ontario Provincial Football League shall ensure that all collectors of personal information are familiar with the potential use of the personal data.
6. All personal data collected by the Ontario Provincial Football League shall be maintained by the Ontario Provincial Football League.
7. The Ontario Provincial Football League shall request individual permission for the use of any personal data collected which is extraneous to that which has been identified above unless authorized by law.

#### LIMITING USE, DISCLOSURE AND RETENTION

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law.

1. The Ontario Provincial Football League shall limit the use of personal information collected to only those purposes identified within this Policy, except with the consent of the individual as legally required.

2. The Ontario Provincial Football League shall retain personal information in a manner that is consistent with its other statutory and legal requirements. The Ontario Provincial Football League shall only retain personal information only as long as is reasonably necessary to meet these requirements.
3. Registration data and athlete information shall be retained for a period of three years after an individual has left a program of the Ontario Provincial Football League, in the event that the individual chooses to return to the program.
4. Parental/Family information shall be retained for a period of three years after an individual has left a program of the Ontario Provincial Football League, in the event that the individual chooses to return to the program.
5. Information collected by coaches shall be retained for a period of three years after an individual has left a program of the Ontario Provincial Football League, in the event that the individual chooses to return to the program.
6. Employee information shall be retained for a period of seven years in accordance with Canada Customs and Revenue Agency Requirements.
7. Personal health information shall be immediately destroyed when an individual chooses to leave the Ontario Provincial Football League program.
8. Information pertaining to infractions shall be retained for a period of four years, in the event that the individual chooses to return to the program.
9. Marketing information shall be immediately destroyed upon compilation and analysis of collected data.
10. The Ontario Provincial Football League has numerous affiliates which offer football programs under the auspices of the Ontario Football Alliance. The Ontario Provincial Football League may share personal information with these associations and leagues in order to facilitate Football Programming and ensure compliance with rules and regulations.
11. The Ontario Provincial Football League may from time to time enlist the services of third party vendors in order to provide football programs, technical and support services. Prior to enlisting the services of these firms, the Ontario Provincial Football League shall ensure that treatment of personal information remains consistent with the Privacy Policy of the Ontario Provincial Football League.
12. The Ontario Provincial Football League may disclose to a government authority that has asserted lawful authority to obtain the information or where the Ontario Provincial Football League has reasonable grounds to believe the information could be useful in the investigation of an unlawful activity or to comply with a subpoena or warrant or an order made by the court or otherwise as permitted by applicable law.
13. The Ontario Provincial Football League may at some point be involved in the merger, transfer or reorganization of its activities. The Ontario Provincial Football League may disclose personal information to the other party in such a transaction. The Ontario Provincial Football League shall ensure that treatment of personal information remains consistent with the Privacy Policy of the Ontario Provincial Football League.
14. The Ontario Provincial Football League may at its discretion release personal information for the purposes of collecting debts which may be owed to the Ontario Provincial Football League.

15. The Ontario Provincial Football League shall not sell, trade, barter, or exchange for consideration any personal information obtained.
16. Documents shall be destroyed via shredding. Electronic files shall be deleted in their entirety. The Ontario Provincial Football League shall also ensure that the hard drive is physically destroyed should any hardware be discarded.

#### ACCURACY

Personal information shall be accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

1. The Ontario Provincial Football League shall make all efforts to ensure that all entrusted personal information is maintained in an accurate manner.
2. The Ontario Provincial Football League shall consider the interests of individuals in decision making, ensuring that decisions are not based on flawed personal information.
3. The Ontario Provincial Football League shall update information upon notification.

#### SAFEGUARDS

Security safeguards appropriate to the sensitivity of the information shall protect personal information.

1. The Ontario Provincial Football League's employees are required to treat all personal information confidentially.
2. The Ontario Provincial Football League maintains reasonably available safeguards that comply in all material respects with industry standards to guard personal information against unauthorized access, disclosure, copying, loss, destruction, use, or modification.
3. Methods of protection and safeguards to be employed shall include but in no way be limited to locked files, offices and storage areas, security clearances, and need to-know access, as well as technological measures such as passwords, encryption, and firewalls.
4. The level of safeguards employed by the Ontario Provincial Football League shall be directly related to the level of sensitivity of the personal information collected.
5. The following steps shall be taken to ensure security:
  - a. Paper information is either under supervision or secured in a locked or restricted area.
  - b. Electronic hardware is either under supervision or secured in a locked or restricted area. In addition, passwords are used on computers.
  - c. Paper information is transmitted through sealed, addressed envelopes or in boxes by reputable courier/delivery companies.
  - d. Electronic information is transmitted through a direct line or is encrypted.
  - e. External consultants and agencies with access to personal information shall provide the Ontario Provincial Football League with appropriate privacy assurances.

#### OPENESS

An organization shall make readily available to individual's specific information about its policies and practices relating to the management of personal information.

1. The Ontario Provincial Football League shall publicly disclose (via web site or upon request by contacting the Privacy Officer) the methods by which the Ontario Provincial Football League handles personal information.
2. The information available may include but is not limited to:
  - o The name, address, and phone number of the Ontario Provincial Football League Privacy Officer.
  - o The required forms to access or change personal information.
  - o A description of the type of personal information held by the Ontario Provincial Football League and the general uses thereof.

#### INDIVIDUAL ACCESS

Upon request, individuals shall be informed of the existence, use and disclosure of their personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

1. Subject to applicable legislation and upon reasonable notice in writing, the Ontario Provincial Football League shall allow an individual access and review of the personal information held by the Ontario Provincial Football League.
2. The Ontario Provincial Football League shall provide the requested information in a timely manner and understandable format at either no expense or at nominal expense relating to photocopying and shipping expenses.
3. The Ontario Provincial Football League shall disclose the source of the information when requested and provide an account of third parties to whom the information may have been disclosed.
4. Should the individual believe that any personal information is incomplete or incorrect, the individual may advise the Ontario Provincial Football League to update the information. The information shall be corrected by the Ontario Provincial Football League in a timely manner. If the information is subject to interpretation or is an opinion, the Ontario Provincial Football League shall not change the record of information but may annotate the record to indicate the individual's views. Pertinent third parties shall also be made aware of the corrections.
5. The Ontario Provincial Football League may request sufficient information to confirm an individual's identity before the release of personal information to the individual.
6. Individuals may be denied access to their personal information. Upon refusal, the Ontario Provincial Football League shall inform the individual of the reasons for such actions and the associated provisions of PIPEDA. The denial of requests may be based upon:
  - a. The information being too prohibitively costly to provide
  - b. The information containing reference to other individuals
  - c. The information being subject to solicitor-client or litigation privilege

- d. Legal, security, or commercial proprietary reasons

## CHALLENGING COMPLIANCE

An individual shall address any challenges concerning compliance with these principles and PIPEDA to the Privacy Officer.

1. The Ontario Provincial Football League shall have procedures in place to resolve possible grievances.
2. Upon receipt of a challenge, the Ontario Provincial Football League shall acknowledge receipt of the complaint, clarify the nature of the complaint, and make the complaint procedures readily available and accessible.
3. The Privacy Officer shall promptly review and investigate all allegations of policy violations and/or complaints. The review shall look at practices and procedures which have occurred and determine the appropriate measures to be taken.
4. The Privacy Officer shall submit a written report to the Ontario Provincial Football League within twenty-eight (28) days of receipt of the complaint.
5. The Privacy Officer shall notify the complainant of the investigation outcome and the measures taken to rectify the challenge within thirty (30) days of the original complaint.

## PRIVACY ON THE INTERNET

The Ontario Provincial Football League respects the privacy of its Internet users and shall protect that privacy as vigorously as possible.

1. The Ontario Provincial Football League does not collect information that personally identifies individuals except when individuals provide such information on a voluntary basis.
2. The Ontario Provincial Football League shall only collect information that is voluntarily provided by the user and undertakes that such information shall be kept strictly confidential. Individual information provided to the Ontario Provincial Football League to gain access to its web site shall not be sold or made available to a third party.
3. The Ontario Provincial Football League reserves the right to perform statistical analyses of user behaviour and characteristics in order to measure interest in and use of the web site so as to improve design and navigation. Only aggregated data shall be used for this sole purpose.
4. Users should also be aware that certain non-personal information and data may be automatically collected by the Ontario Provincial Football League through the operation of “cookies”. “Cookies” are small text files that identify an individual computer’s browser entering a web site. They allow the site to track that browser’s movement through the site over several sessions. Through cookies, a web site can recognize repeat users, facilitate the user’s access to and use of the site, and allow a site to track usage behaviour that allows content improvements.
5. If individuals do not want a cookie placed on their computer by the Ontario Provincial Football League, they may disable cookies altogether by modifying the Preference section of their internet browser.

6. If individuals wish to be informed of the appearance of cookies, they may turn on a warning prompt by modifying the cookie warning section.

Individuals should be cognizant that other sites linked to the Ontario Provincial Football League web site may not share the same policies as the Ontario Provincial Football League.