



## **PRIVACY POLICY**

### ***INTRODUCTION***

Personal Information is collected from club members as necessary for administration of Club programs and activities. Personal information is used, disclosed, protected, and accessible for correction according to the wishes of Club members and the law.

The Club will attempt to collect only the minimum required personal information from members and will delete that information within a year following the end of each ski season or as soon as allowed by a regulatory agency.

Bulkley Valley Cross Country Ski Club (BVCCSC) is subject to the *Personal Information Protection Act* ("the Act"), which sets out principles of fair information practices that in turn form ground rules for the collection, use and disclosure of personal information. In accordance with the Act, BVCCSC is responsible for the protection of personal information and the fair handling of it at all times both throughout the organization and in dealings with third parties.

### ***AIM***

The aim of the Privacy Policy is to provide direction for how personal information will be collected, used and disclosed within BVCCSC.

### ***DEFINITIONS***

**BVCCSC** is the Bulkley Valley Cross Country Ski Club

**CCBC** is Cross Country BC

**CCC** is Cross Country Canada

The **Club** means the Bulkley Valley Cross Country Ski Club

**Personal Information** means information about identifiable individuals including:

- their name, age, gender, address(es), phone number(es), fax number(s), email address(es);
- their medical information, personal identification numbers including medical card, driver's license, social insurance, or credit card numbers; and,
- their interests, preferences, personal profile, occupation, education and any other information which is reasonably regarded as private.

### ***OBJECTIVES***

- The Club will only collect such Personal Information as is reasonably necessary for Club



programs and activities.

- The Club will reasonably ensure the accuracy, privacy, and security of Personal Information.

## **PURPOSES**

1. The Club will collect and use Personal Information from its members (“Members”) that directly relates to or is necessary for a Club program or activity and may collect, use, and/or disclose Personal Information as necessary to:
  - a) register Club membership including to CCBC and CCC;
  - b) collect dues;
  - c) register Members for Club programs or activities;
  - d) meet insurance requirements
  - e) post lists of participants, volunteers, and officials for Club programs or activities;
  - f) send Club newsletters, bulletins, and announcements to Members;
  - g) collect necessary, relevant medical information for safety purposes;
  - h) contact appropriate people in case of emergency;
  - i) obtain the consent of guardians for their children to participate;
  - j) protect the Club and its Members, agents, or employees, from legal liability; and,
  - k) take measures to ensure a safe environment for participants enrolled in Club programs (e.g. Criminal Record Checks for coaches)

## **CONSENT**

2. Each applicant for Club membership or participation in a Club program or activity must give informed consent to the collection, use, and disclosure of Personal Information in accordance with purposes stated in the Privacy Policy and any additional purpose stated or obvious at the time consent is given as follows:
  - a. each applicant named in an application who is capable of giving consent must give consent by signing the application; and,
  - b. a guardian of any minor applicant named in the application who is incapable of giving consent must give consent by signing the application on behalf of the minor.
3. An individual is deemed to consent to the Club’s collection, use, and disclosure of Personal Information if, at the time of deemed consent, the purpose for collection, use, or disclosure of Personal Information would be obvious to a reasonable person, and the individual voluntarily provides the personal information to the Club for that purpose.
4. Anyone may withdraw consent to the collection, use, or disclosure of his or her Personal Information, provided however that:
  - a. the Club may, upon withdrawal of consent, and following notice to the member, cancel the individual’s membership in the Club or deny the individual the right to participate in a Club program or activity;
  - b. despite withdrawal of consent, the Club may retain, use, and disclose such Personal Information as is allowed by law to protect the legal interests of the Club or its Members, agents, or employees; and



- c. the Member may not withdraw consent if the withdrawal will frustrate performance of a legal obligation.

## ***PERMITTED COLLECTION, USE AND DISCLOSURE***

5. In order to operate the Club and manage Club programs or activities, the Club may disclose Personal Information to Club executives, leaders, and volunteers who are trained to follow the Privacy Policy.
6. The Club may disclose such Personal Information to CCBC as is necessary to meet the CCBC membership requirements and the Club will take reasonable steps to seek privacy protection of such Personal Information by CCBC.
7. The Club may collect, use, or disclose such Personal Information to Club executive, leaders, volunteers, ski patrol members, doctors, paramedics, appropriate medical or emergency personnel, next of kin, family members, or friends of Members as may be reasonably necessary to manage medical or emergency conditions, or protect life, health, security, or safety.
8. The Club may collect, use, or disclose Personal Information without express consent if:
  - a. the collection, use, or disclosure is clearly in the interest of an individual and the individual's consent cannot be obtained in a timely way;
  - b. the collection, use, or disclosure is necessary for medical treatment of an individual who does not have the legal capacity to give consent; or
  - c. the use is necessary to respond to an emergency that threatens the life, health or security of an individual.
9. The Club may collect, use, and disclose such Personal Information as may be reasonably necessary to:
  - d. protect the Club or Members from legal liability;
  - e. protect the Club or Members from fraud;
  - f. investigate a breach or anticipated breach of law;
  - g. enforce the Club's legal rights;
  - h. comply with the law, including giving compellable evidence; or
  - i. obtain legal advice.

## ***RESTRICTIONS***

10. The Club will not collect, use, or disclose and individual's Personal Information except with the informed consent individual for the purposes for which it was collected.
11. The Club will not disclose Personal Information to Club Members except in accordance with the Privacy Policy.
12. The Club will not disclose Personal Information to third parties for promotions, solicitations, advertising, marketing, or commercial purposes.
13. The Club will not contact Members except to facilitate or promote Club goals, programs or activities.



## **SECURITY, RETENSION AND DESTRUCTION**

14. The Club will take all reasonable security measures to protect Personal Information from unauthorized access, collection, use, disclosure, disposal, disclosure, distribution, copying, modification, or similar risks.
15. If the Club uses a Member's Personal Information to make a decision that directly affects the member, the Club will retain that Personal Information for at least one year after being used so that the affected Member has a reasonable opportunity to obtain access to that Personal Information
16. The Club will retain Personal Information only as long as is reasonably necessary to carry out the purposes of the Privacy Policy and will then destroy it so that it is unreadable.

## **PRIVACY OFFICER**

17. The Club will appoint a Privacy Officer who will, on behalf of the Club, take reasonable steps to and be responsible for:
  - a. ensuring Club compliance with the *Personal Information Protection Act* (BC), the Privacy Policy, or any applicable privacy laws;
  - b. implementing the Privacy Policy;
  - c. disclosing to any individual the individual's Personal Information under the control of the Club, how it is being used, and to whom it has been disclosed beyond the BVCCSC;
  - d. correcting inaccurate Personal Information;
  - e. reasonably accommodating special privacy needs or concerns of Members, provided however that such accommodation is not required if the cost to the Club (in time and/or money) is onerous;
  - f. establishing procedures to receive and respond to privacy complaints;
  - g. receiving, responding to, and attempting to resolve privacy complaints made in writing and delivered to the Privacy Officer;
  - h. answering questions about the Privacy Policy;
  - i. educating Club executives, volunteers, and leaders about the Privacy Policy;
  - j. advising the Club about the Privacy Policy and privacy laws; and,
  - k. recommending appropriate changes to the Privacy Policy and privacy practices of the Club from time to time.
18. Unless otherwise stated and through appointment by the board of directors the Privacy Officer will be the Club Chairperson (President)

## **INFORMATION**

19. The Club will publish the Privacy Policy on the Club website and in the Club Policy Manual, and will provide a copy to any Member on request.
20. The Club will publish the name and contact information for the Club Privacy Officer on the Club website and in the Club Policy Manual and make this information available to any individual on request.



Approved - January 15, 2008  
Revised – March 2021



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Revisions made in March 2021:

- Changed BVXCSC to BVCCSC
- Added “meet insurance requirements” to purposes
- Added second paragraph to introduction