



Policy Name PRIVACY POLICY AND PROCEDURES		Date of Approval October 13, 2017	Activation Date October 13, 2017
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1.0 Privacy Statement

The collection, use, disclosure and retention of personal information are all regulated by law in British Columbia. Gymnastics BC (GBC) collects and uses personal information primarily to enable provision of the programs, services, products and information for members of GBC. PIPA defines personal information as information about an identifiable individual such as name, address, email, phone or image.

To enable GBC to manage and develop its operations from local to international levels, GBC may share personal information with its members and Gymnastics Canada Gymnastique and with selected third parties who are acting on GBC's behalf as agents, suppliers or service providers.

From time to time, GBC may contact members or others directly or may include information from corporate sponsors whose products, services or information may be of interest to you. Our Privacy Policy is available at www.gymbc.org or by contacting the GBC Privacy Officer.

GBC provides members with the ability to opt in to receiving information directly from GBC or on GBC's behalf when a member provides their personal email address.

GBC does not share address mailing lists (residence or business addresses) with agents, suppliers or service providers unless required as part of an insurance claim or other legal matter.

1.1 Principles of Privacy

At GBC, we value our relationship with our members and respect their privacy according to the following principles.

1.1.1 Accountability

GBC is accountable and responsible for the safeguarding of personal information in our custody or under our control. GBC has appointed a Privacy Officer who is responsible for privacy issues within GBC. GBC has implemented procedures for the handling of personal information, and has developed a complaint process for members with personal information concerns.

1.1.2 Purposes for Which Information is Collected

GBC collects personal information only for the following purposes:

- a. to establish and maintain a responsible relationship with our members and to provide ongoing service to all areas of gymnastics within British Columbia;
- b. to support and assist our member clubs in delivering programs and services at the local level;



- c. to support and assist Gymnastics Canada Gymnastique in delivering programs and services at the national and international levels;
- d. to manage and develop our operations and help us plan for future growth; and,
- e. to meet legal and regulatory requirements.

1.1.3 Consent

GBC will obtain your consent to collect, use or disclose personal information (except where authorized or required by law to do so without consent). Consent can be express, implied, or given through an authorized representative such as parent or guardian, lawyer or agent.

You have the right to refuse or withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. You may have your name removed from our telephone, mail or email lists. However, withdrawal of consent may limit our ability to communicate with and serve you.

1.1.4 Limits on Collection

GBC will limit the amount and type of personal information collected to that which is reasonable and necessary to fulfill its stated purposes.

1.1.5 Limits on Use and Disclosure

GBC uses personal information only for the purposes for which it is collected. Personal information may also be disclosed by GBC for the following reasons:

- a. We may disclose a member's personal information to a person who, in the reasonable judgment of GBC, is seeking the information as an agent of that member;
- b. We may disclose a member's personal information to a public authority or agent of a public authority if, in the reasonable judgment of GBC, it appears that there is imminent danger to life or property, which could be avoided or minimized by disclosure of the information;
- c. In conjunction with special offers or programs, we may disclose members' personal information to our partners and associates or to third-party agents responsible for administering such offers or programs. Any such disclosure is made with the member's consent and on a confidential basis and is limited to the information needed for the stated purpose;
- d. Information collected before January 1, 2004 will be used for the general purposes for which it was collected, but members' consent will be obtained for any new uses.



1.1.6 Retention of Information

GBC will keep personal information used to make a decision about an individual for a minimum of one year. After one year, GBC will destroy, erase or render anonymous personal information as soon as retention is no longer necessary.

1.1.7 Accuracy

GBC will make every reasonable effort to ensure that personal information it is using or disclosing is accurate and complete.

1.1.8 Safeguarding information

GBC will protect the personal information in its custody or control by making security arrangements to prevent unauthorized access, collection or use. GBC will protect the confidentiality of your personal information when dealing with other organizations.

1.1.9 Openness

GBC is open about the policies and procedures it uses to protect your personal information. Information about our policies and procedures is available in writing and electronically.

1.1.10 Providing Access

You have the right to access your personal information through the GBC Privacy Officer. Unless prevented by law, GBC will provide you with information regarding your personal information and give you the opportunity to correct any errors of fact.

1.1.11 Recourse

GBC has developed a complaint handling process. GBC will investigate all complaints received and take appropriate measures to correct information and handling practices as required. Individuals may appeal any GBC decision to the Information and Privacy Commissioner of British Columbia.

1.2 Questions or Concerns

If you have any questions or concerns about our privacy policy, please call us at (604) 333-3496 (outside of Greater Vancouver: 1-800-556-2242). Otherwise, we will assume that we have your consent to continue to collect, use and disclose your personal information for the purposes identified above.



2.0 Privacy Officers

2.1 Privacy Officer

The GBC Privacy Officer is the CEO.

Brian Forrester
Chief Executive Officer
Gymnastics BC
268-828 West 8th Avenue, Vancouver, BC V5Z 1E2
bforrester@gymbc.org

The Privacy Officer is the person within GBC whose job it is to:

- a. encourage compliance with provisions of the Personal Information Protection Act;
- b. respond to requests for access to and correction of personal information and general issues concerning personal information;
- c. work with the Information and Privacy Commissioner during an investigation of a privacy complaint against GBC;
- d. manage GBC's complaint process.

2.2 Assistant Privacy Officer

The Assistant Privacy Officer is the GBC Member Services Manager.

Brittany Cawson
Member Services Manager
Gymnastics BC
268-828 West 8th Avenue, Vancouver, BC V5Z 1E2
bcawson@gymbc.org

2.3 Responsibilities

The Privacy Officer and/or Assistant Privacy Officer will be responsible for:

- a. managing the implementation of policies and procedure and recommending any necessary revisions to GBC's information management practices, policies and procedures;
- b. staff training and member relations;
- c. providing assistance when a more detailed knowledge of GBC's responsibilities is required;
- d. acting as resources to the Privacy Officers designated by GBC's member clubs.



2.3.1 Delegation of Duties

The Privacy Officer and Assistant Privacy Officer may request delegation of duties to another individual, but approval must come in writing from the Board of Directors before such delegation can be made.

3.0 Application of the Privacy Policy

3.1 Consent

GBC will make all reasonable effort to ensure that the purposes for personal information collection are stated at the time collection takes place.

3.1.1 Forms

GBC will include a statement of purpose on all appropriate forms as well as a provision for an individual to opt out of providing some personal information. This includes written and electronic forms.

3.1.2 Communications Materials

Consent is not required to disclose information (including photos and videos) obtained by observation at a public event in which an individual voluntarily participates.

However, as a courtesy, GBC will endeavour to obtain consent to use personal information in its publications such as Layout, in communications materials such as posters and press releases and on its web site.

3.2 Refusal or Withdrawal of Consent

An individual has the right to refuse consent to use personal information, or to withdraw consent at any time.

3.2.1 Refusal of Consent

GBC will give individuals the opportunity to opt out at time of collection of information. The individual's choice will be respected. This may mean that the individual does not receive general GBC communications or any special offers or information on behalf of GBC's partners and associates. GBC does not share member contact information with partners, sponsors, agents or suppliers, but GBC may distribute information to members on behalf of those entities.

3.2.2 Withdrawal of Consent

An individual may withdraw consent for use of personal information at any time upon 30-days written notice to the Privacy Officer. The notice may be given by post, fax or email. The Privacy Officer must notify the individual of any consequences of this



withdrawal of consent, and must also advise the individual when GBC has complied with their request.

3.3 Sharing Information

GBC is responsible for personal information that we have collected and transferred to another organization. This may be a member club, Gymnastics Canada Gymnastique (GCG), partner, associate, sponsor, agent, or service contractor. In all cases, when transferring information, GBC will clearly state what requirements must be met to comply with the legislation and with GBC's personal information management policy.

GBC is also responsible for personal information collected on our behalf by another organization. British Columbia organizations collecting information on behalf of GBC must clearly state the purpose for collection and all such information will be treated by GBC according to the legislation and our personal information management policy.

Organizations outside British Columbia, such as GCG, are not subject to the British Columbia Personal Information Protection Act legislation.

3.4 Accessing and Correcting Information

An individual has the right to access their personal information and to correct errors of fact.

3.4.1 Accessing Personal information

- a. Requests for access to personal information must be made in writing to the Privacy Officer. The request must include sufficient detail to enable the Privacy Officer to identify the information requested.
- b. The Privacy Officer must respond to the request for access within 30 business days. The response must include, if requested, the ways in which the personal information has or is being used, and a list of organizations to whom the information has been disclosed.
- c. The Act identifies certain circumstances where information may be withheld. If the Privacy Officer withholds information, he or she must give the reason and identify the Section of the Act under which the information is being withheld.

3.4.2 Correcting Personal Information

- a. If personal information held by GBC is incorrect, an individual may request correction by writing to the Member Services Manager. The individual must provide sufficient documentation to show that the correction is justified. Any original documentation supplied through this process by an individual will be returned, although copies will be taken for the file.



- b. The Member Services Manager will ensure that the appropriate corrections are made and that any incorrect information that has been disclosed within the year prior to the request is corrected.
- c. An individual may not correct opinions, but may annotate their file. This is done by writing to the Privacy Officer. The Privacy Officer will ensure that such annotation is included in the individual's file.
- d. An individual may not request original documents held by GBC but may request copies. GBC will provide copies to the individual at minimal or no cost. These documents must relate solely to the individual's personal information and may not include information of a personal nature about any other individual.

3.5 Handling Complaints about Personal Information

3.5.1 Initiating a Complaint

Complaints about GBC's management of personal information may be submitted in writing and should be directed to the GBC Privacy Officer. The complaint must be submitted using the *GBC Personal Information Complaint Form* to ensure that the concern is documented thoroughly and with all relevant details.

Initial complaints may be directed to members of staff, management, or to a representative of the Board of Directors who will pass them to the Privacy Officer or Assistant Privacy Officer as appropriate.

3.5.2 Investigating a Complaint

Complaints may not be investigated by any person who may be named in the complaint.

- a. The Privacy Officer or Assistant Privacy Officer (the "Investigator") will investigate all complaints received. The Investigator will acknowledge receipt of the complaint promptly, and may contact the individual to clarify the complaint if necessary.
- b. The Investigator will be given access to all records, employees and others who handled the personal information or access request.
- c. Where the complaint is justified, the Investigator will take appropriate measure to rectify the situation, including correcting information handling practices and policies where necessary and communicating those changes to relevant staff and volunteers. The Investigator will follow up to verify that the required changes have been implemented.
- d. The Investigator will notify individuals of the results of an investigation clearly and promptly, informing them of relevant steps taken.
- e. The Investigator will record all decisions to ensure consistency in applying the Act.



3.5.3 Requesting a Review

Should an individual not be satisfied with the handling of their complaint, the Privacy Officer or Assistant Privacy Officer will inform them of the recourse they have to request a review by the Information and Privacy Commissioner of British Columbia. The Privacy Officer or Assistant Privacy Officer will provide the required contact information to a complainant wishing a review.

3.6 Security of Personal Information

Personal information in GBC custody or under GBC control will be safeguarded with the appropriate level of security, according to whether the information is regarded as -low sensitivity," -medium sensitivity," or -high sensitivity." Security measures may include locked file cabinets, restricted access to offices, safety deposit boxes, and for computers: user ids and password-protected electronic files.

In addition to all other security measures, both the CEO and GBC's lawyer will hold in a sealed envelope a copy of all electronic passwords and listing of the location of all keys for access in case of necessity.

3.7 Retention of Personal Information

The Act requires GBC to hold personal information for one year. For various legal purposes, GBC holds all personal information for a minimum of two years. During that period, an individual has access to his or her personal information through the Privacy Officer and may correct errors of fact or lodge a complaint through GBC's standard personal information complaint procedures. Selected personal information may be retained indefinitely. All retained personal information is subject to the rules and regulations of the Act regarding use, security and disclosure.

Personal information may be retained indefinitely in the form of statistics for purposes of research and program and organizational development, and to support and assist partners and associates in their development programs. Personal information may also be retained indefinitely in the form of anonymous anecdotal information for research, training and organizational development.

3.8 Destruction of Personal Information

Personal information no longer necessary to the purposes of GBC will be destroyed, erased, or rendered anonymous.

- a. GBC will periodically clear its files of personal information that no longer needs to be retained. Written records or documentation containing personal information to be destroyed will be shredded or burnt. Computer files containing personal information to be destroyed will be erased, and a file search conducted to ensure that all copies of the information are erased.



- b. Where existing personal information is corrected, updated or replaced, the previous version will be dated and archived in a locked file cabinet for a minimum of one year.

3.9 Providing Employment or Personal References

No member of the GBC management and staff or representative of the GBC Board of Directors may provide a personal or employment reference for an individual without the consent of the individual. In the absence of consent, GBC will only confirm an employment; i.e. -yes, that individual worked/volunteered for us" or -no, that individual did not work/volunteer for us."

Consent is given by an individual's request to GBC for a written reference or for use of a GBC representative's name. In the absence of such a request from the individual, GBC or one of its representatives must have satisfactory confirmation of consent before providing an employment or personal reference. That confirmation may be an email, fax of a resume listing GBC or its representative as a referee. It is not GBC's responsibility to seek consent.

3.10 Collecting Information Without Consent

According to the Act, GBC may collect, use or disclose personal information without the consent of the individual for limited reasons. GBC will forgo obtaining consent on the following occasions.

- a. When collecting or disclosing the information clearly benefits you or is necessary for medical treatment and your consent cannot be obtained in a timely way.
- b. When the information is needed for a proceeding or an investigation and getting consent might compromise the availability or accuracy of the information.
- c. When the information is used for journalistic purposes and for no other purpose
- d. When the information is collected by observation at a competition or another public event in which the individual voluntarily participates
- e. When the information is necessary to determine the individual's suitability to receive an honour or award or be selected for an athletic purpose.
- f. When the collection of information is required or authorized by law (such as criminal record checks)
- g. When the information is necessary to facilitate collection of a debt owed to GBC.

3.11 Updating Privacy Policy and Procedures

The Privacy Officer will be responsible for answering questions about GBC's personal information policy and procedures and for remaining current with information posted



on the BC Government web site. GBC will update its Privacy Policy and Procedures on a regular basis and provide information on changes to its members in a timely way through Layout and the GBC web site.

