

HOCKEY MANITOBA PRIVACY POLICY

Background

Hockey Manitoba is the sole governing body for amateur hockey in Manitoba. In co-operation with its 10 Regions, and various leagues and associations, Hockey Manitoba operates Hockey Programming across the Province. Hockey Programming means making all arrangements for amateur hockey leagues, teams and games including choosing and training coaches and officials, deciding which players may participate at which level, establishing appropriate rules and regulations for amateur hockey. As part of their Hockey Programming activities, Hockey Manitoba and its aforementioned partners also take responsibility for determining if transfer regulations may apply, scouting, gauging the success of certain programs in order that it might improve upon them, facilitating emergency contact, providing educational opportunities, career opportunities, research and to maintaining regular electronic updates/contact with participants.

Purpose of this Policy

Hockey Manitoba has developed this Privacy Policy for implementation beginning January 1, 2004. This Policy describes the way that Hockey Manitoba collects, uses, retains, safeguards, discloses and disposes of the personal information of prospective members, members, and others including players, coaches, officials, managers and volunteers.

This Policy describes the way that Hockey Manitoba will subject to applicable legal requirements, adhere to all relevant federal and provincial legislative privacy requirements. The Policy follows the 10 Canadian Standards Association (CSA) principles identified in the federal Personal Information Protection and Electronic Documents Act (PIPEDA). The Policy describes each principle and the method of implementing each. Hockey Manitoba will strive to meet or exceed federal and provincial legislative requirements and will ensure that it remains current with changing technologies and laws. Any and all changes will immediately be posted to the Hockey Manitoba web site.

1. Accountability

1.1 Hockey Manitoba will appoint a (the "Privacy Officer") whose responsibilities will include those of the implementation and monitoring of the Hockey Manitoba Privacy Policy. The Privacy Officer will be responsible for Hockey Manitoba's compliance with privacy principles. This person will also be responsible for responding to access requests in accordance with this Policy. The Privacy Officer will report to the President and the ultimate responsibility for Privacy issues will rest with the Hockey Manitoba Board of Directors. The Privacy Officer may at his/her discretion enlist assistance from staff members and/or volunteers within the organization. This will not in any manner mitigate his/her responsibility for Privacy issues.

1.2 Please contact our office to speak with Hockey Manitoba's Privacy Officer at 204 925-5757 or email us at info@hockeymanitoba.mb.ca.

1.3 Hockey Manitoba's Privacy Officer will ensure that Hockey Manitoba manages all personal information in its possession in accordance with this Policy including that, which may be transferred to a third party. Third party organizations who handle information on behalf of Hockey Manitoba shall be contractually obligated to adhere to the standards of Hockey Manitoba.

1.4 Hockey Manitoba will implement internal policies which will facilitate adherence to this Privacy Policy including but not limited to the following:

- Security measures at all levels designed to protect personal information in our possession at a level consistent with its sensitivity.

- Implementing procedures designed to respond to complaints and/or inquiries.
- Staff training in all facets of information management, including awareness of Hockey Manitoba's Privacy Policy and policies and procedures developed in accordance with the Policy.

2. Identifying Purposes, Type of Information Collected

2.1 Hockey Manitoba collects personal information from prospective members, members, coaches, officials, managers and volunteers for the purposes of conducting Hockey Programming, which may include the following:

- A player's name, address and date of birth are collected to determine that the player's geographical, division of play and level of play information are consistent with Hockey Manitoba regulations.
- Historical information concerning past teams played for is collected in order to determine if any Hockey Manitoba transfer regulations may apply.
- Information as to a player's parents' name, address, telephone numbers and email addresses may be collected in order to facilitate emergency contact information as well as to ensure compliance with Hockey Manitoba residency regulations.
- Educational information may be collected in order to ensure all Hockey Manitoba residency regulations have been adhered to.
- Information in accordance with Hockey Manitoba's Constitution, Regulations and Rules of Competition Handbook may be collected in order to confirm a member's residency status
- Player's names and jersey numbers may be included in game/tournament programs or posters.
- E-mail addresses may be collected for the purposes of facilitating membership communication related to upcoming events and programs.
- Personal information collected for the purposes of hockey registrations may also be used for hockey specific research purposes including but not necessarily limited to hockey demographic type research.
- Hockey Manitoba has numerous associations and leagues, which offer hockey programs under the auspices of Hockey Manitoba. These include the 10 Regions and their associations, the Manitoba Junior League, Manitoba Major Junior League, Manitoba Junior B, Senior Female, Senior Male, Winnipeg Junior Female and the Manitoba AAA leagues. Hockey Manitoba discloses the personal information described in paragraph 2.2 to all of these organizations in order to facilitate Hockey Programming and ensure compliance with rules and regulations.
- Potential and actual insurance claims and the subsequent investigation thereof. In an emergency situation, medical records, medical history and medical forms may be requested.
- Appeals and regulations challenges as well as information collected to defend Hockey Manitoba against legal action brought against Hockey Manitoba.

2.2 Hockey Manitoba will endeavor through its member partners, associations/leagues to advise potential registration candidates of the purpose for the collection of the data requested at the time of registration or by reference to our web site at www.hockeymanitoba.mb.ca . We will further endeavor to ensure that all collectors of the personal information are familiar with the potential use of the personal data. All personal data collected by Hockey Manitoba shall be maintained in our main office and 4 zone registration offices, all of which are listed on our web-site.

2.3 Hockey Manitoba will request individually permission for the use of any personal data collected which is extraneous to that which has been identified above, unless said usage is authorized by law.

2.4 In addition to using personal information for Hockey Programming purposes, Hockey Manitoba may from time to time wish to use member name, address and contact information for the purposes of providing promotional opportunities, including by providing the information to Hockey Manitoba's leagues and associations and/or other third parties including the Manitoba

Moose, whom Hockey Manitoba believes provide services or goods that may be of interest to you. Hockey Manitoba and any such third parties may contact you with promotions [or to provide further hockey specific communications and association/league information updates]. Hockey Manitoba will provide an opportunity for the member to consent to these opportunities during the registration process. If you consent but later wish to opt out of this use of information later, you may do so by contacting us as described at Section 3.4 below.

3. Consent

3.1 Hockey Manitoba will use the personal information for the uses specified above in Section 2 and in Sections 3.2 and 3.3 below. By consenting to provide your information to Hockey Manitoba, you are deemed to consent to our use of the information for the purposes of Hockey Programming listed in Section 2 of this Privacy Policy and to disclosure of the information to other associated organizations for the same purpose.

3.2 Hockey Manitoba recognizes that hockey by its nature is a contact sport and injuries are to a certain extent inherent in the game. We believe medical records, medical history and medical forms of the individual may be of assistance in an emergency situation and therefore we may request them. While our members and prospective members are under no obligation whatsoever to supply this information and may refuse to do so without penalty, Hockey Manitoba will consider receipt of this information as consent for its subsequent use in an emergency medical situation.

3.3 If at any time you wish to withdraw your consent to the use of your information for any purposes, you may do so by contacting the Privacy Officer for Hockey Manitoba. We will do our best to accommodate your request in a timely fashion without diminishing the services we provide to you. We will explain to you the impact of your withdrawal on any services we provide to you.

3.4 The knowledge and consent of individuals are required for the collection, use or disclosure of personal information except where inappropriate. In certain circumstances, personal information can be collected, used or disclosed without the knowledge or consent of the individual. For example, Hockey Manitoba may collect or use an individual's personal information without his or her knowledge or consent if it is clearly in their interests and consent cannot be obtained in a timely way, such as when an individual is seriously ill, injured or mentally incapacitated. We may also collect, use or disclose personal information without an individual's knowledge or consent if seeking consent might defeat the purpose of collecting the information, such as in the investigation of a breach of an agreement or a contravention of a federal or provincial law or where the life, health or security of an individual is threatened.

We may also collect, use or disclose personal information without an individual's knowledge or consent to a lawyer representing Hockey Manitoba in the collection of a debt, to comply with a subpoena, warrant or other court order or as may be required or authorized by law. Generally, Hockey Manitoba shall seek consent to use and disclose personal information at the same time or before it collects the information. However, we may seek consent to use and disclose personal information after it has been collected, but before it is used or disclosed for any purpose.

4. Limiting Collection

4.1 All information shall be collected fairly and lawfully within the criteria as set forth in our Privacy Policy.

4.2 Hockey Manitoba shall not indiscriminately collect information. The amount and type of information we collect shall be limited to that which is required to fulfill our identified purposes.

5. Limiting Use, Disclosure and Retention

5.1 Subject to applicable legislation, Hockey Manitoba shall limit use of personal information it collects to purposes that we have disclosed in Sections 2. (Identifying Purposes)

5.2 Hockey Manitoba shall not use or disclose an individual's personal information for purposes of other than those for which it was collected, except with the individual's consent or as required by law. Personal information shall only be retained as long as necessary to fulfill the purpose for which it was collected.

5.3 Hockey Manitoba shall maintain documents for certain periods of time dependant upon necessity, more specifically: we will normally maintain registration data for a 3-year period after an individual has left our programs in the event that individual chooses to return to our programs after leaving. Parental/family information will be normally maintained for a similar 3-year period after a member has left our program.

Hockey Manitoba shall maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased or made anonymous.

5.4 Certain documents may be subject to legislated retention periods either federally or provincially and these will be respected at all times by Hockey Manitoba.

6. Accuracy

6.1 Hockey Manitoba shall strive to ensure to the extent it can that the information entrusted to us is maintained in an accurate manner. We shall try to maintain the interests of the individual and attempt to ensure that decisions are not made for or about an individual based on personal information that is flawed.

6.2 Hockey Manitoba shall only update information in the event of a renewal or registration and/or an update.

7. Safeguards

7.1 Security safeguards have been implemented to ensure your personal information is protected from theft as well as unauthorized access, disclosure, copying, use or modification thereof.

7.2 The level of safeguards employed shall be directly related to the level of sensitivity of the personal information collected. The more sensitive the information, the higher the level of security employed.

7.3 Methods of protection and safeguards to be employed shall include but in no way be necessarily limited to locked files, offices and storage areas, security clearances and need to know access as well as technological measures such as passwords and encryption.

8. Openess

8.1 Hockey Manitoba publicly discloses the methods by which we handle your personal information. This information is readily available through our Privacy Policy, on our web site or upon request by contacting the Hockey Manitoba Privacy Officer at 204 925-5757 or info@hockeymanitoba.mb.ca.

8.2 Hockey Manitoba shall make information readily available, including:

- a) The means of contacting the Privacy Officer accountable for Hockey Manitoba's compliance with its Privacy Policy.
- b) A description of the type of personal information held by Hockey Manitoba, including a general account of its use.
- c) A copy of any brochures or other information that explains Hockey Manitoba's policies and standards.
- d) A list of personal information that is made available to related organizations.

9. Individual Access

9.1 Subject to applicable legislation, upon request by the individual concerned Hockey Manitoba shall disclose whether or not it actually holds personal information on an individual. We shall disclose the source of this information when requested and provide an account of third parties to whom the information may have been disclosed.

9.2 Hockey Manitoba may request sufficient information to confirm your identity before releasing your personal information to you.

9.3 Subject to applicable legislation, Hockey Manitoba shall endeavor to provide this information within 30 days of receipt of the information requested and only charge nominal fees for the purpose of off-setting its expenses incurred in supplying the requested information. This information shall be provided in an understandable format at the time you make a request.

9.4 Any inaccurate information that is brought to our attention shall be corrected by Hockey Manitoba as quickly as possible and any pertinent third parties shall be apprised of the corrections in due course.

10. Challenging Compliance

10.1 Hockey Manitoba has in place procedures for the resolution of grievances in the administration of its Privacy Policy.

10.2 Upon receipt of a complaint Hockey Manitoba shall make available the complaint procedures which will be simple and easy to access.

10.3 Hockey Manitoba shall investigate all complaints. If the complaint is deemed justified Hockey Manitoba shall take the appropriate steps to ensure that compliance is achieved and will make changes to its policies to allow for compliance in the future.

10.4 All complaints shall be addressed to the Hockey Manitoba Privacy Officer at 204 925-5757 or info@hockeymanitoba.mb.ca.