



PRIVACY (PIPA) POLICIES AND PROCEDURES

Purpose

Triathlon BC's Privacy Policy is governed by the BC Personal Information Protection Act ("PIPA"), and describes the way that Triathlon BC collects, uses, and discloses personal information of third parties in the course of its activities, implementing Triathlon BC's commitment to collect, use and disclose personal information responsibly. The Triathlon BC Privacy Policy is based on the standards required by PIPA, and Triathlon BC's interpretation of these responsibilities. To the extent that the provisions in this Privacy Policy are inconsistent with PIPA, PIPA's requirements shall govern.

This policy deals with personal information about employees, players, parents, fans, directors, officials, coaches and other volunteers.

Definitions

The following terms have these meanings in this Code: "Personal information" is information about an identifiable individual and includes information that relates to their personal characteristics (e.g., gender, age, income, home address or phone number, ethnic background, family status), their health (e.g., health history, health conditions, health services received by them), their competitive performance or their activities and views (e.g., religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information, however, does not include business contact information (e.g., an individual's business address and telephone number), which is not protected by PIPA.

Accountability

The Privacy Officers of Triathlon BC are responsible for the organization's handling of personal information and ensuring that all staff receives appropriate training on privacy issues. The Privacy Officers also handle personal information access requests and complaints. The Privacy Officers of Triathlon BC are the Executive Director and the Chair of Triathlon BC and may be contacted at the following address:

Triathlon BC, c/o Privacy Officer(s)
PO Box 34098 Station D
Vancouver, BC
V6J4M1
T: 604-736-3176

Application of this Policy

1. Personal information will only be collected, used and disclosed by Triathlon BC to engage athletes, parents, directors, spectators, coaches, officials and other volunteers in the programs and activities offered by Triathlon BC and related organizations, meeting and maintaining the highest standard of sport programming consistent with the mandate and mission of Triathlon BC. Personal information that may be collected, used or disclosed includes, but is not limited to, the following:
 - a) Name, address, phone number, cell phone number, fax number and e-mail address for the purpose of emergency contacts, managing insurance claims and receiving communications from Triathlon BC in regards to programs, events, and activities.
 - b) NCCP number, education, resumes, fitness test results, and experience for database entry at the Coaching Association of Canada and to determine the level of certification, coaching qualifications and coach selection.
 - c) Credit card or chequing information for registration at programs, activities and events; travel administration and purchasing equipment, coaching manuals and other products.
 - d) Date of birth, athlete history, birth certificate, citizenship and member club to determine eligibility, age group and appropriate level of play/competition of registered players.
 - e) Résumé, length of service/participation, history, details of performance results, certifications, awards won and bio information for the purpose of award nominations, bio's, published articles and media relations.

- f) Registered 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.
 - g) Video footage and photographs of individuals at competitions for the purpose of technical monitoring, coach/club review, training, educational purposes, sport promotion, media publications and posting on Triathlon BC's website, displays or posters. In some cases, videos and other media formats from an event will be available for purchase.
 - h) Competitive performance results, discipline results and long-term suspensions lists to notify Clubs and Districts of suspended members;
 - i) Criminal records check and related personal reference information for the purpose of implementing Triathlon BC's volunteer/contract worker screening program.
 - j) Personal health information including provincial health card numbers, allergies, emergency contact, doctors' notes and past medical history for the purpose of medical emergency or reports relating to medical or emergency issues.
 - k) Marketing information including attitudinal and demographic data on individual members and registered players to determine membership demographic structure, and program wants and needs.
 - l) Passport numbers and Aeroplan/frequent flyer numbers for the purposes of arranging travel.
 - m) Club, League and District contact information such as club name, web address, contact names, phone number and email address for the purpose of Triathlon BC and member programming. Further, this information is collected, used or disclosed for the purpose of directing the public to such club and provide easy access for club-to-club communication.
 - n) Name and contact information of board members, volunteers and committee members for the purpose of communication within and between committees, volunteers, Board members and staff.
2. Triathlon BC is a member of and accredited by Triathlon Canada. As a condition of such participation, Triathlon BC discloses certain information as required by Triathlon Canada. Triathlon BC also reports certain personal information to the various government-related agencies such as viaSport, which provide funding for Triathlon BC programs, as may be required by those agencies in connection with such funding.
3. If a purpose has not been identified herein, Triathlon BC will seek consent from individuals when personal information is collected, used or disclosed for a purpose not already consented to. This consent will be documented as to when and how it was received.

Indirect Collection

4. While Triathlon BC sometimes collects information directly from individuals, usually information is collected from individuals by organizations associated with Triathlon BC, principally local teams, Clubs, camps, clinics and events, and is submitted to Triathlon BC by those organizations to enable the individual's participation in the activities of Triathlon BC. Triathlon BC relies on local Clubs to ensure collected information is accurate and that collection and submission of this information has been done in compliance with all applicable laws, including PIPA.

Consent

5. Triathlon BC will obtain any required consent by lawful means from individuals at the time of direct collection, prior to the use or disclosure of the personal information. If the consent to the collection, use or disclosure was not obtained upon receipt of the information, consent will be obtained prior to the use or disclosure of that information. Prior to or as part of obtaining this consent, Triathlon BC will disclose to individuals the purpose for which the personal information is to be collected, used or disclosed.
6. Triathlon BC may collect, use, or disclose personal information without consent where reasonable to do so and where permitted under PIPA or by law. Without limiting the foregoing, Triathlon BC may collect, use or disclose personal information in circumstances including the following:
- a) Personal information is collected by observation of a public sporting event at which the person appears voluntarily
 - b) The information is necessary to determine an individual's suitability for an athletic position, standing or ranking
 - c) The information is necessary to determine an individual's suitability for an honour, award or similar benefit, including a scholarship or bursary,
 - d) The collection, use or disclosure is necessary for the medical treatment of the individual if the individual is unable to give consent, or
 - e) Where the collection, use or disclosure of the information is clearly in the interests of the individual and consent cannot be obtained in a timely way
7. By providing personal information to Triathlon BC, and participating in its programs and activities, individuals are considered to have consented to the use of the information in the manner and for the purposes identified in this policy.
8. Triathlon BC will not, as a condition of a product or service, require an individual to consent to the collection, use or disclosure of information beyond that required to fulfill the specified purpose.

9. An individual may withdraw consent to the collection, use or disclosure of personal information at any time, subject to legal or contractual restrictions. The Privacy Officer(s) will advise the individual of the implications of such withdrawal. Depending on the circumstances, if consent is withdrawn the individual may not be able to continue their participation in certain programs and activities of Triathlon BC.

Limiting Collection

10. All personal information will be collected fairly, by lawful means and for the purposes as specified in this policy or as specified at the time of collection. Triathlon BC will not use any form of deception to obtain personal information.

Limiting Use, Disclosure and Retention

11. Personal information will not be used or disclosed by Triathlon BC for purposes other than those for which it was collected or as provided herein, except with the consent of the individual or as required or permitted by law.

12. Information disclosed to a third party with consent from the individual will be protected by appropriate arrangements with the third party to limit use and disclosure.

13. Personal information will be retained for a minimum of one year after its last use by Triathlon BC. After that time, information will be retained for such further periods as may be appropriate and necessary for the business purposes of Triathlon BC pursuant to best practices and standards, or as required by law, after which time it will be securely destroyed or erased in accordance with Triathlon BC's internal records, policies and procedures.

Accuracy

14. Triathlon BC will use accurate and up-to-date information as is necessary for the purposes for which it is to be used, to minimize the possibility that inappropriate information may be used to make a decision about an individual. As indicated above, Triathlon BC relies on local teams, Clubs, Leagues and Districts for the accuracy of information collected by them and remitted to Triathlon BC.

Safeguards

15. Triathlon BC is obligated to protect personal information by making reasonable security arrangements against such risks as unauthorized access, loss, copying, theft, collection, use, disclosure or disposal. Personal information is protected by security safeguards appropriate to the sensitivity of the information. Methods of protection and safeguards include, but are not limited to, locked filing cabinets, restricted access to offices, security clearances, need-to-know access and technological measures including the use of passwords, encryption and firewalls.

Openness

16. Triathlon BC will make available, on request, information about its policies and practices relating to the management of personal information. This information is available through Triathlon BC's website or upon request by contacting one of the Privacy Officers.

17. The information available to the public includes:

- a) The name or title, address and telephone number of Triathlon BC's Privacy Officers.
- b) The forms that may be used to access personal information or change information.
- c) A description of the type of personal information held by Triathlon BC, including a general statement of its approved uses.
- d) A copy of any brochures or other information that explain the organization's policies, standards, or codes; and
- e) Contact information regarding other organizations such as Canadian Interuniversity Sport and Canadian Centre for Ethics in Sport to which Triathlon BC may disclose personal information in its custody or control

Individual Access

18. Subject to PIPA and all applicable laws, upon written request, and with assistance from Triathlon BC, an individual may be informed of the existence, use and disclosure of his or her personal information and may be given access to that information. As well, an individual may be entitled to be informed of the source of the personal information along with an account of third parties to whom the information has been disclosed unless this information shall or may not be disclosed by law.

19. Requested information will be disclosed to the individual within 30 days of receipt of the written request at no cost to the individual, or at nominal costs relating to photocopying expenses, unless there are reasonable grounds to extend the time limit.

20. If nominal fees will be charged for the production of personal information under Triathlon BC's control, the organization will provide the applicant with a written estimate of the fee prior to providing the information.

21. If personal information is inaccurate or incomplete, it will be amended as required. An individual may request correction of his or her personal information that is under the custody or control of Triathlon BC. Subject to reasonable cost and

timeliness, if appropriate Triathlon BC will correct the information within 30 days of receiving a written request in the approved form. If corrections are not made, Triathlon BC will annotate the personal information under its control, indicating that the correction was requested but not made.

22. An individual may be denied access to his or her personal information if:

- a) This information is prohibitively costly to provide;
- b) The information contains references to other individuals;
- c) The information cannot be disclosed for legal, security or commercial proprietary purposes;
- d) The information is subject to solicitor-client or litigation privilege;
- e) The law otherwise requires or permits the information not to be disclosed.

23. Upon refusal, Triathlon BC will inform the individual the reasons for the refusal and the associated provisions of PIPA.

Challenging Compliance

24. An individual may challenge the Triathlon BC's compliance with PIPA, by submitting a complaint in writing to:

Triathlon BC, c/o Privacy Officer(s)
PO Box 34098 Station D
Vancouver, BC
V6J4M1
T: 604-736-3176

25. Upon receipt of a written complaint, Triathlon BC will:

- a) Record the date the complaint is received;
- b) Acknowledge receipt of the complaint by way of telephone conversation or email;
- c) Notify the Privacy Officer(s) who will clarify the nature of the complaint at an early stage and seek to informally resolve the complaint;
- d) If unresolved, appoint an investigator using Triathlon BC personnel or an independent investigator;
- e) Notify the complainant of the outcome of the investigation and any relevant steps taken to rectify the complaint, including any amendments to policies and procedures, usually within 60 days of receipt of the complaint.

26. An individual may request a review of Triathlon BC's compliance with this policy by contacting the British Columbia Information and Privacy Commissioner at www.oipc.bc.ca.

27. Triathlon BC may, from time to time, review and revise this Privacy Policy and its practices, and reserves the right to make changes at any time without notice.

Policy Review and Approval

28. This Triathlon BC Privacy Policy was last reviewed and approved by the Triathlon BC Board of Directors on the 19th day of June, 2024.