

# PADDLE CANADA PRIVACY POLICY

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# PADDLE CANADA'S PRIVACY POLICY

## Purpose of this Policy

Privacy of personal information is governed by the Personal Information Protection and Electronics Documents Act ("PIPEDA"). This policy describes the way Paddle Canada (PC) collects, uses, retains, safeguards, discloses and disposes of personal information, and states Paddle Canada's commitment to collecting, using and disclosing personal information responsibly. This policy is based on the standards required by PIPEDA, and Paddle Canada's interpretation of these responsibilities.

**A copy of Paddle Canada's Privacy Policy is provided to any member on request to Paddle Canada.**

Our organization, Paddle Canada, is the governing body for recreational canoeing and kayaking in Canada, and provides these services to members and the public:

- Publication and distribution of KANAWA, Canada's Paddling Magazine to Paddle Canada members, and subscribers;
- Maintain an accurate record of certification for course participants and Instructor members;
- Provide leadership opportunities for the development and growth of Paddle Canada instructor and certification programs;
- Seeks affiliation with other organizations with a view to the promotion of the safety and enjoyment of paddling in Canada; and
- Encourages and promotes safety by Canadians in safe paddling, when canoeing or kayaking, in a recreational environment;

## Personal Information

Personal information is information about an identifiable individual. Personal information 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) 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 information (e.g., an individual's business address and telephone number), which is not protected by privacy legislation.

## Accountability

The Past President serves as the Privacy Officer and is responsible for the monitoring of information collection and data security, and for ensuring that all staff and volunteers receive appropriate training on privacy issues and their responsibilities. The Privacy Officer also handles personal information access requests and complaints.

## Purpose

Personal information will only be collected by Paddle Canada to promote and develop recreational canoeing. Paddle Canada collects personal information from prospective members, subscribers, instructors, course participants, volunteers, and members of the public for purposes that include, but are not limited to, the following:

- Name, address, phone number, daytime phone number, fax number and e-mail address for the purpose of providing information from Paddle Canada for promotions, sponsorship, programs and events.
- Name, address, phone number, cell phone number, email address and date of birth for the purpose of maintaining an individual's record of certification within Paddle Canada's national canoeing and kayaking certification programs. Records of certifications may be requested, by accredited Paddle Canada Instructor Trainers to ensure that individuals participating in higher-level Paddle Canada courses have the necessary prerequisites.

- Name, address and membership numbers for the purpose of mailing KANAWA, Canada's Paddling Magazine to its members, subscribers, and instructors.
- Credit card information, not withheld in any database or retrieval system, for:
  - Payment of member and subscriber registrations and renewals as related to KANAWA, Canada's Paddling Magazine
  - Payment of advertising and other expenses as related to KANAWA, Canada's Paddling Magazine.
  - Payment of Instructor member registrations and renewals and of sanctioned Paddle Canada course and program fees.
- Personal health information including provincial health card numbers, allergies, emergency contact and past medical history for use in the case of medical emergency during an accredited Paddle Canada course or program.
- Marketing : Individuals providing their names addresses or e-mail addresses to Paddle Canada may receive promotional advertisements from Paddle Canada and, within Canada, MBNA MasterCard Canada for the purpose of fundraising via Paddle Canada's Affinity MasterCard program.
- Advertisements: Individuals providing their addresses or e-mail addresses to Paddle Canada may receive promotional advertisements from Paddle Canada and donation requests for the purpose of fundraising.

If a purpose has not been identified herein, Paddle Canada may seek consent from individuals when personal information is used for a purpose not already consented to. This consent will be documented as to when and how it was received.

Consent is required to be obtained by lawful means from individuals at the time of 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. Paddle Canada may collect personal information without consent where reasonable to do so and where permitted by law.

**By providing personal information to Paddle Canada, via its waivers, acknowledgment of risk or other forms individuals are consenting to the use of the information for the purposes identified in this policy.**

In determining the form of consent to use, Paddle Canada will take into account the sensitivity of the information.

Paddle Canada 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.

An individual may withdraw consent to the collection, use or disclosure of personal information at any time, subject to legal or contractual restrictions, provided the individual gives one week's notice of such withdrawal to Paddle Canada. The Privacy Officer will advise the individual of the implications of such withdrawal.

### **Limiting Collection**

All personal information will be collected fairly, by lawful means and for the purposes as specified in this policy. Paddle Canada will not use any form of deception to obtain personal information.

### **Limiting Use, Disclosure and Retention**

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

Information disclosed to a third party (i.e. Mailing house, MBNA Canada) with consent from the individual shall be protected by a third party agreement to limit use and disclosure. All lists are for one-time use, as noted for the above projects, and Paddle Canada does not sell its list to other third party agencies.

Personal information will be retained for certain periods of time in accordance with the following:

- Membership and subscription data will be retained indefinitely from the time a member or subscriber chooses to leave Paddle Canada, in the event that the individual chooses to return;
- Membership, subscription and personal data for all deceased persons will be terminated immediately upon receipt of notification.
- Registration data and health information collected by instructors will be retained for a period of seven years after an individual has completed a Paddle Canada course or program, except in the case of minor participants. Minor participant information will be retained for a period of 7 years from the time the individual ceases to be a minor (i.e. age 25) as required by the terms of Paddle Canada's insurance provider, for liability purposes;
- All certification data will be retained for the life of the participant.
- Credit card information, when provided by telephone, shall be retained in a secure location, after which it will be destroyed. When provided by internet, no information is retained.
- As otherwise may be stipulated in federal or provincial legislation.

Personal information that is used to make a decision about an individual will be maintained for a minimum of one year of time to allow the individual access to the information after the decision has been made.

Paddle Canada may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where Paddle Canada 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.

Documents will be destroyed by way of shredding and electronic files will be deleted in their entirety. When hardware is discarded, Paddle Canada will ensure that the hard drive is physically destroyed.

### **Accuracy**

Paddle Canada 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.

### **Safeguards**

Personal information is protected by security safeguards appropriate to the sensitivity of the information against loss or theft, unauthorized access, disclosure, copying, use or modification. 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. The following steps will be taken to ensure security:

- Paper information is either under supervision or secured in a locked or restricted area.
- Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers.
- Paper information is transmitted through sealed, addressed envelopes or in boxes by reputable courier/delivery companies
- Electronic information is transmitted either through a direct line or is encrypted.
- Staff members are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with this policy.
- External consultants and agencies with access to personal information will provide Paddle Canada with appropriate privacy assurances.

## **Openness**

Paddle Canada will publicize information about its policies and practices relating to the management of personal information. This information is on Paddle Canada's web site or upon request by contacting the Privacy Officer.

The information available to the public includes:

- The name or title, address and telephone number of Paddle Canada's Privacy Officer.
- The forms that may be used to access personal information or change information.
- A description of the type of personal information held by Paddle Canada, including a general statement of its approved uses.

## **Individual Access**

Upon written request, and with assistance from Paddle Canada, an individual may be informed of the existence, use and disclosure of his or her personal information and will be given access to that information. As well, an individual is 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.

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.

If personal information is inaccurate or incomplete, it will be amended as required.

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

- This information is prohibitively costly to provide;
- The information contains references to other individuals;
- The information cannot be disclosed for legal, security or commercial proprietary purposes;
- The information is subject to solicitor-client or litigation privilege.

## **Challenging Compliance**

An individual may challenge Paddle Canada's compliance with this policy and PIPEDA, by submitting a challenge in writing to the Privacy Officer.

Upon receipt of a written complaint, Paddle Canada will:

- Record the date the complaint is received;
- Notify the Privacy Officer who will serve in a neutral, unbiased capacity to resolve the complaint;
- Acknowledge receipt of the complaint by way of telephone conversation and clarify the nature of the complaint within three days of receipt of the complaint;
- Appoint an investigator using Paddle Canada personnel or an independent investigator, who will have the skills necessary to conduct a fair and impartial investigation, and who will have unfettered access to all files and personnel, within ten days of receipt of the complaint;
- Upon completion of the investigation and within 25 days of receipt of the complaint, the investigator will submit a written report to Paddle Canada;
- 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, within 30 days of receipt of the complaint.

## **Approval and Review**

This Policy was approved by the Paddle Canada Board of Directors on 01-February-2005 and is reviewed annually.

## **IP Address**

When the user's web browser requests a web page from another computer on the Internet, it automatically gives that computer the address where it should send the information. This address is called the computer's "IP address."

Paddle Canada does not collect, use or disclose IP Addresses.

## **Cookies**

Cookies are small text files that a Web browser transfers to and from your hard drive for record keeping purposes. Cookies make life easier for you by saving your passwords, purchases, and preferences while you're at our site. The use of cookies is an Internet standard, and you'll find cookies at most major Web sites.

The use of cookies is an industry standard and many major browsers are initially set up to accept them. You can reset your browser to either refuse to accept all cookies or to notify you when you have received a cookie. However, if you refuse to accept cookies, you may not be able to use some of the features available on websites.

Paddle Canada does not use cookies to identify specific individuals.

## **Copyright and Legal Disclaimer**

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## **Applicable Law**

This site is created and controlled by Paddle Canada in the province of Ontario. As such, the laws of the province of Ontario will govern these disclaimers, terms and conditions, without giving effect to any principles of conflict of laws.