



PRIVACY POLICY

PURPOSE

The objective of Commonwealth Sport Canada's (CSC's) Privacy Policy (The Policy) is to promote responsible and transparent management practices of personal information in a manner that is consistent with the provisions of *Personal Information Protection and Electronic Documents Act (Canada)* (PIPEDA). This document is to inform individuals about CSC's ongoing commitment to ensure that the personal information obtained during the course of its activities remains accurate, confidential, and the use of any information will be in accordance with this Policy.

SCOPE

The Policy describes the practices of CSC with respect to the collection, use and disclosure of personal information. This Policy does not impose any limits on the collection, use or disclosure of personal information that:

- Is covered by one of the exceptions in Sections 12, 15 and 18 of PIPEDA to collection, use and disclosure of personal information without consent;
- Was collected prior to January 1, 2004, where personal information is used and disclosed to fulfill the same reasonable purpose for which it was collected.

This Privacy Policy does not apply to personal information if superseded by:

- the Freedom of Information and Protection of Privacy Act
- the Federal Access to Information Act and Privacy Act

POLICY

Personal information is defined as any information that can be used to distinguish, identify or contact a specific individual. This Policy applies to personal information of members, athletes, volunteers, and others, including those who have participated in an event or program sponsored or organized by CSC, or have expressed an interest in the Commonwealth Games Movement.

Personal information that CSC may collect, retain, use and disclose includes, but is not limited to: name, date of birth, home or work addresses, contact information, passport information, health and medical information or history, banking or credit card information (card number, type and expiry date), interests of an individual or other information CSC deems necessary to fulfill its duties including to comply with the Universal Code of Conduct to prevent and address Maltreatment in Sport (UCCMS)'s disclosure of information requirements

This Policy does not cover aggregated data from which the identity of an individual cannot be determined. CSC retains the right to use aggregated data in any way that it determines appropriate.

Purposes for Collecting Personal Information

CSC may collect personal information to fulfill the following purposes:



- a) Provide, administer, and manage CSC programs and services.
- b) Comply with the law and regulatory requirements, as part of normal business transactions and record keeping, for programs and services;
- c) Provide information to participants, clients, contractors, partner organizations, and other third parties about the CSC's programs and services;
- d) Manage the CSC's relationship and communications with participants, staff and volunteers, sponsors, clients, contractors, partner organizations, and other third parties; and
- e) In the case of individuals designated by CSC as "UCCMS Participants" under the Office of the Sport Integrity Commissioner Service Agreement between CSC and the Sport Dispute Resolution Centre of Canada, as may be amended from time to time, provide personal information to the Office of the Sport Integrity Commissioner (OSIC) who's responsible for managing the UCCMS.
- f) Such other purposes are consistent with these purposes and with the legitimate activities of CSC.

The personal information CSC requests from an individual will depend upon the programs, events and services in which that individual participates or derives benefit from.

Accountability

CSC is responsible for all personal information under its custody or control, including information that it may transfer to a third party.

The CEO will appoint a Primary Privacy Officer and a Secondary Privacy Officer for CSC. The Privacy Officer is directly accountable for CSC's handling of personal information.

CSC is responsible for personal information provided to third parties who provide services to CSC. CSC requires any such third parties to use the personal information only for the purposes for which it is provided to them, and to protect the privacy of the personal information in accordance with privacy laws and in a manner that is consistent with CSC's Privacy Policy.

Information Received from Other Sources

CSC may receive personal information from others who may have collected information from athletes, participants and volunteers who wish to participate in events or programs organized or sponsored by CSC. CSC may request personal information of individuals who have consented to the sharing of their information. The CSC will handle all information it obtains according to this Policy regardless of the source.

How CSC Collects and Uses Personal Information

CSC will only collect, retain, use or disclose personal information where it is necessary to fulfill the purposes for which it was collected, or for a purpose reasonably related to those purposes.

To fulfill the purposes for which the information was collected, CSC may disclose personal information to third parties. To the extent that CSC may enter into contracts or other arrangements with third parties which involve the transfer of personal information, CSC will ensure that the third party enters into appropriate covenants with CSC to provide the same level of protection over the personal information that CSC provides.



CSC may seek consent for the use and disclosure of personal information after it has been collected, but before it is used or disclosed, for a purpose not previously identified to the individual(s) concerned.

CSC does not require individuals consent for the collection, use or disclosure of personal information beyond what is necessary to provide the product or service, as a condition of supplying products or services.

CSC does not attempt to obtain consent for collecting, using or disclosing personal information by providing false or misleading information regarding the purposes for the collection, use or disclosure of personal information or by using deceptive or misleading practices. CSC will not sell, rent or lease your personal information to third parties unless they have obtained explicit consent to do so.

When CSC May Disclose Personal Information

CSC may disclose a participant's personal information only when required to do so in the conduct of its business to:

- a) Relevant national/provincial sporting organizations.
- b) The Commonwealth Games Federation.
- c) Commonwealth Games Associations of other countries.
- d) Host Organizing Committees.
- e) Relevant municipal recreation departments, community service organizations, schools, and educational institutions
- f) Government agencies, foundations, sponsors, and other funders of CSC.
- g) Collecting agencies, lawyers, and others when collecting a debt to CSC or enforcing an agreement between an individual and CSC.
- h) Print and electronic media in connection with promotional materials.
- i) Individuals or organizations who assist CSC in informing individuals about the Commonwealth Games programs and/or services.
- j) Individuals or organizations who are advisers or service providers of CSC.
- k) Individuals or organizations involved in maintaining, reviewing and developing CSC's business systems, procedures, and infrastructure including testing or upgrading the computer systems.

CSC may be obliged to disclose information without consent. Such circumstances may include:

- a) Where required by law or by order or requirement of a court, administrative agency or governmental tribunal.
- b) Where CSC believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety, or property of an identifiable person or group.
- c) Where it is necessary to establish or collect monies owing to CSC.
- d) Where it is necessary to permit CSC to pursue available remedies or limit any damages that CSC may sustain; Where it is required to comply with the UCCMS for UCCMS participants in the OSIC Service Agreement between CSC and SDRCC as may be amended from time to time (the "Service Agreement") and who have signed the required consent form.



- e) Where the information is public.

Where obliged or permitted to disclose information without consent, CSC will not disclose more information than is required.

Consent

CSC will obtain signed or digital consent from all individuals for all personal information that it collects.

By providing personal information to CSC an individual agrees and consents that CSC may collect, use, and disclose personal information in accordance with this Policy. In addition, where appropriate, specific authorizations or consents may be obtained from time to time.

Subject to legal and contractual restrictions, any individual may refuse or withdraw consent at any time. Such refusal or withdrawal may restrict the individual's involvement or participation or may impact the level of services provided by CSC for the individual.

To Decline to Have Personal Information Collected, Used, or Disclosed for Certain Purposes

An individual may decline to have their personal information collected, used, or disclosed for particular purposes. These purposes may include but are not limited to receiving information regarding programs or services and/or sharing a participant's information with other organizations.

To choose this option, participants must contact the Privacy Officer of CSC and request to change their consent permissions.

Accuracy

CSC endeavours to ensure that any personal information provided and in its possession is as accurate, current and complete as necessary for the purpose for CSC use. When inaccurate, incomplete or out of date information is found, CSC will revise the information and, if necessary, use its best efforts to inform any third-party agencies which CSC provided with inaccurate information in order that those third parties may also correct their records.

Retention

CSC keeps a participant's personal information at the National Office and only as long as it is required for the reasons it was collected. This period may extend beyond the end of a participant's relationship with the CSC, but it will be only for so long as it is necessary.

When personal information is no longer required for CSC purposes, CSC will destroy, delete, erase, or convert it into an anonymous form.

Security

CSC staff, volunteers and designated recipients are required to treat all personal information confidentially.



CSC will maintain reasonably available safeguards that comply in all material respects with industry standards to guard personal information against loss, destruction, or modification.

Protection

CSC endeavours to maintain appropriate physical, procedural and technical security with respect to its offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of personal information. This also applies to disposal or destruction of personal information.

CSC further protects personal information by restricting access to those individuals that the management of CSC has determined require that information.

Any individual associated with CSC who misuses personal information will be considered to have committed a serious offence for which disciplinary action may be taken. This may include but is not limited to termination of employment, termination of any agreement between CSC and that individual or organization or to exclusion from any CSC team or other activities.

Access to Personal Information

CSC permits the reasonable right of access and review of personal information held in confidence about an individual by that individual or their legal representative and will endeavour to provide the information within a reasonable time, and no later than 30 days following the request.

In the event the individual wishes the personal information to be changed, CSC reserves the right to append any alternative text the individual concerned believes to be appropriate and to retain the original information.

CSC reserves the right to decline to provide access to personal information where the information requested:

- a) Would disclose
 - (i) personal information, including opinions, about another participant or about a deceased participant; or
 - (ii) trade secrets or other business confidential information that may harm CSC or the competitive position of a third party.
- b) Would interfere with contractual or other negotiations of CSC or a third party.
- c) Is subject to solicitor-client or litigation privilege.
- d) Is not readily retrievable and the burden or cost of providing would be disproportionate to the nature or value of the information.
- e) Does not exist, is not held, or cannot be found by CSC.
- f) Could reasonably result in
 - (i) serious harm to the treatment or recovery of the individual concerned.
 - (ii) serious emotional harm to the participant concerned or another participant; or
 - (iii) serious bodily harm to another participant.
- g) May harm or interfere with law enforcement activities and other investigative or regulatory functions of a body authorized by law to perform such functions; or
- h) May be withheld or is requested to be withheld under applicable legislation.



Where information will not or cannot be disclosed, the participant making the request will be provided with the reasons for non-disclosure.

Commonwealth Sport Canada Website - www.commonwealthsport.ca

CSC web servers routinely track general information about visitors such as IP addresses, time of visit, and pages that are being accessed. This information is used internally, only in aggregate form, to better serve visitors by helping us to:

- a) Manage our site.
- b) Diagnose any technical problems; and
- c) Improve the content of our site.

CSC provides information and services via its website. By using the website, users agree that information may be collected, used and disclosed in accordance with this Policy.

Cookies

All Websites use temporary cookies to customize the site to an individual's interests and to allow individuals to access the website. Users can set their browser not to accept cookies and still access the Site. This may make portions of the Site unavailable or difficult to use. This information is not collected by CSC.

Non-Personal Information

CSC's Website automatically collects certain non-personal information regarding website users. The Website also collects non-personal data which is used for system administration purposes and to update the Site.

Forms, email, etc.

Individuals may provide CSC with personal information when completing forms or contacting CSC via email. This information is stored in a secure environment. The Individual's personal information will not be used or disclosed unless permitted by this policy.

Links

CSC's Website may contain links to other third-party websites that are provided for the convenience of users. CSC has no responsibility or liability for or control over those websites or their collection, use and disclosure of personal information.

Children's Privacy Policy - Website

CSC recognizes the need to provide additional privacy protection for children who visit the Site.

CSC approaches communication on the Internet with respect for, and commitment to protecting, the privacy rights, concern, and respect for the different sensibilities of our child participants.

CSC may collect personal information from children (under 13 years of age) only on a voluntary basis. CSC does not require this information for children to obtain access, to surf or to view the



content on CSC's Website. In order to participate in certain programs, such as surveys, polls, and the bulletin board, offered on CSC's Website, children may have to provide the following personal information: first name, last name, and e-mail address. CSC will not collect more information than is necessary to participate in such programs. CSC will only use such information for the purposes of administering each program.

Compliance and Complaints

The CEO of CSC is responsible for appointing a Primary and Secondary Privacy Officer. One of these Privacy Officers will promptly review and investigate allegations of violations of this Policy. This review will look at practices and procedures which occurred and determine the appropriate measures to be taken. The Primary Privacy Officer will annually review and assess CSC's compliance with this policy.

Individuals wishing to contact the Privacy Officer may do so by:

- a) Phoning: 613-244-6868 and asking for one of the Privacy Officers*

Document History

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*Current Primary Privacy Officer is Kelly Laframboise
Current Secondary Privacy Officer is Chris Taylor