HOCKEY ALBERTA PRIVACY POLICY

Purpose

Hockey Alberta has developed this Privacy Policy for implementation beginning January 1, 2004. This Policy describes the way that Hockey Alberta collects, use, retain, safeguard, disclose and dispose of the personal information of prospective members, members, and others including players, coaches, referees, managers and volunteers.

This Policy describes the way that Hockey Alberta 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 Alberta 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 Alberta web site.

1. Accountability

1.1 Hockey Alberta will appoint a staff/volunteer person (the "Privacy Officer") whose responsibilities will include those of the implementation and monitoring of the Hockey Alberta Privacy Policy. The Privacy Officer will be responsible for Hockey Alberta 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, or designate and the ultimate responsibility for Privacy issues will rest with the Hockey Alberta Board of Directors. The Privacy Officer may at his/her discretion enlist assistance from other staff/Board members and/or volunteers within the organization. This will not in any manner mitigate his/her responsibility for Privacy issues.

1.2 The Privacy Officer's identity will be fully disclosed and publicly accessible to Hockey Alberta members and the public in general. **Hockey Alberta's Privacy Officer is *Mike Olesen*** and can be reached at ***(403) 342-6777*** or by e-mail at ***molesen@hockeyalberta.ca***.

1.3 The Hockey Alberta Privacy Officer will ensure that Hockey Alberta 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 Alberta shall be contractually obligated to adhere to the standards of Hockey Alberta.

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

2. Identifying Purposes, Type of Information Collected and Website

2.1 Hockey Alberta shall only collect the information reasonably necessary to conduct Hockey Programming. Access to our Privacy policies and procedures will be readily available. Similarly, the process by which challenges may be made to Hockey Alberta compliance and/or adherence to the legislation in question shall be readily available and transparent. To obtain further information, contact the Hockey Alberta Privacy Officer.

2.2 Hockey Alberta collects personal information from prospective members, members, coaches, referees, managers and volunteers for the purposes of conducting Hockey Programming. Specifically:

- 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 Canada and Hockey Alberta regulations.
- Historical information concerning past teams played for is collected in order to determine if any Hockey Canada transfer regulations may apply.
- Information concerning an individual's skill level and development and feedback on programs is collected to measure the success of our programs in order that we may better plan future programs.
- 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 Canada and Hockey Alberta residency regulations.
- Educational information may be collected in order to ensure all Hockey Canada and Hockey Alberta residency regulations have been adhered to.
- E-mail addresses may be collected for the purposes of facilitating membership communication related to upcoming events and programs.
- Information about skill levels, ability, emergency contacts and health to ensure our activities are carried out in a safe and secure environment.
- 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.
- Affiliates. Hockey Alberta has numerous organizations which offer hockey programs under their auspices. These include, but are not necessarily limited to the Canadian Hockey League, Canadian Inter-University Sport and Minor Hockey Associations and Leagues. Hockey Alberta may disclose 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.

2.3 Hockey Alberta will endeavour through 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.hockeyalberta.ca, or the local Association web site. We will further endeavour 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 Alberta shall be maintained in either our office(s)and/or with our Privacy Officer.

2.4 Hockey Alberta 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.

2.5 Hockey Alberta may also use information about an individual who accesses secure areas of www.hockeyalberta.ca, or other member Association web sites. Information you are asked to provide during your use of our web site may include your name, address, e-mail address, age,

sex [and the other types of personal information listed in paragraph 2.2]. All such personal information will be treated within the same parameters as other personal information collected by Hockey Alberta through other means. It is always your choice to provide information in certain fields although failure to complete certain sections may inhibit your ability to fully access all areas of the web site. Our web site also collects non-identifiable information about users such as the users IP address, the sections of the web site visited and the information downloaded. Hockey Alberta may use this non-identifiable information and disclose it to service providers, for system administration purposes and to improve the web site.

3. Consent

3.1 Hockey Alberta 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 Alberta 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 Alberta 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 Alberta 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 Alberta. 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 Hockey Alberta may collect personal information without consent where reasonable to do so and where permitted by law.

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 Alberta 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.

4.3 Hockey Alberta will not use any form of deception in gaining personal information from its members.

5. Limiting Use, Disclosure and Retention

5.1 Subject to applicable legislation, Hockey Alberta shall limit use of personal information it collects to purposes that we have disclosed in Sections 2 (Identifying Purposes) and 3.2, Consent.

5.2 Hockey Alberta shall maintain documents for certain periods of time dependant upon necessity. More specifically:

- We will normally maintain registration data for a three year period after an individual has left our programs in the event that an individual chooses to return to our programs after leaving.
- Parental/family information will be normally maintained for a similar three year period after a member has left our programs.
- Affiliates. Hockey Alberta has numerous organizations which offer hockey programs under the auspices of Hockey Alberta. As explained above, Hockey Alberta may from time to time share information with these associations, and leagues in order to facilitate Hockey Programming and ensure compliance with rules and regulations.
- Hockey Alberta may at some point be involved in the sale, merger, transfer or reorganization of its activities. We may disclose personal information to the other party in such a transaction. Hockey Alberta will ensure that we contractually obligate the other party to treat this information in a manner consistent with our Privacy Policy.
- Hockey Alberta may disclose your personal information to a government authority that has asserted its lawful authority to obtain the information or where the association 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, person, or body with jurisdiction to compel the production of the information or otherwise as permitted by applicable law.
- Hockey Alberta may at its discretion release personal information for the purposes of collecting debts which may be owed to “Associations/Clubs/Leagues”.

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

6. Accuracy

6.1 Hockey Alberta 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 Alberta 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 Alberta 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 Alberta Privacy Officer.

8.2 The information available includes:

- The name address and phone number of the Hockey Alberta Privacy Officer. Hockey Alberta's Privacy Officer is ***Mike Olesen*** and can be reached at ***(403) 342-6777*** or by e-mail at ***molesen@hockeyalberta.ca*** .
- The forms which you may use to access your information or change your information.
- A description of the type of personal information held by Hockey Alberta and our general uses thereof. This includes:
  - registration information, including name, date of birth, address, past teams played on, medical information and e-mail addresses
  - information used for scouting, potential sponsorship opportunities, donors, alumni and information retained for the purposes of Hockey Alberta business contacts.
- Information that may be made available to related organizations, associations and leagues, in accordance with the provisions of this Privacy Policy.

9. Individual Access

9.1 Subject to applicable legislation, upon request by the individual concerned Hockey Alberta 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 Alberta may request sufficient information to confirm your identity before releasing your personal information to you.

9.3 Subject to applicable legislation, Hockey Alberta shall endeavour 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 Alberta as quickly as possible and any pertinent third parties shall be apprised of the corrections in due course.

10. Challenging Compliance

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

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

10.3 Hockey Alberta shall investigate all complaints. If the complaint is deemed justified Hockey Alberta 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 Alberta Privacy Officer at 100 College Bvld., Box 5005, Rm. 2606, Red Deer, Alberta, T4N 5H5. The Hockey Alberta Privacy Officer is ***Mike Olesen*** and can be reached at ***(403) 342-6777*** or by e-mail at ***molesen@hockeyalberta.ca*** .