

## OFSAA PRIVACY POLICY

The Ontario Federation of School Athletic Association's (herein referred to as OFSAA) Privacy Policy is designed to ensure that all personal information is handled in accordance with the Personal Information Protection and Electronics Documents Act ("PIPEDA").

### Accountability

1. Doug Gellatly is the Privacy Officer and is responsible for the monitoring of information collection and data security, and ensuring that all staff receives appropriate training on privacy issues and their responsibilities. The Privacy Officer also handles personal information access requests and complaints. The Privacy Officer may be contacted at [doug@ofsaa.on.ca](mailto:doug@ofsaa.on.ca) or by calling 416-426-7391.

### Purpose

2. OFSAA collects personal information to meet and maintain the highest standard of organizing and programming school sport. OFSAA only collects personal information that pertains to the organizing and programming of school sport. OFSAA does not provide access to information to outside sources (sponsors, partners, etc).

### Consent

3. By providing personal information to OFSAA, individuals are consenting to the use of the information for the purposes identified in this policy.
4. 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 OFSAA. The Privacy Officer will advise the individual of the implications of such withdrawal.

### Limiting Collection

5. The collection of personal information is limited to information that is necessary for the planning and execution of OFSAA's programs and services. Information is always collected in a fair, compliant and lawful way.

### Limiting Use, Disclosure and Retention

6. The use of personal information is limited to that for which it was collected. Personal information is only retained for the fulfillment of those purposes and is retained in a safe and secure location.
7. From time to time OFSAA may facilitate communication on behalf of a partner (sponsor, etc). This will be done in a way that does not provide the sponsor with access to personal information. As an organization, we will distribute the communication on behalf of the partner.

8. Personal information will be retained for certain periods of time in accordance with the following:
  - a. championship forms will be destroyed immediately after each championship;
  - b. OFSAA Program Registration Forms (Women's Sport School, Coed Coaching Symposium, Coaching in Ontario Schools) for a period of two years; this information is retained for communication on upcoming programs.
  - c. OFSAA Transfer Appeal Documents will be retained for a period of three years;
  - d. Employee information will be retained for a period of seven years in accordance with Canada Customs and Revenue Agency requirements.
9. OFSAA may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where OFSAA 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.
10. Documents will be destroyed by way of shredding and electronic files will be deleted in their entirety. When hardware is discarded, OFSAA will ensure that the hard drive is physically destroyed.

### **Safeguards**

11. Personal information is stored in a secure area and on password protected computers.

### **Individual Access**

12. Upon request, an individual can gain access to the existence, use and disclosure of his or her personal information. An individual can challenge the accuracy and completeness of the information and have it amended as appropriate.
13. OFSAA will publicize information about its policies and practices relating to the management of personal information. This information is available upon request by contacting the Privacy Officer at 416-426-7391.
14. The information available to the public includes:
  - a. the name or title, address and telephone number of OFSAA's Privacy Officer;
  - 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 OFSAA including a general statement of its approved use.

### **Challenging Compliance**

15. An individual may challenge OFSAA's compliance with this policy and PIPEDA, by submitting a challenge in writing to our Privacy Officer by email to [doug@ofsaa.on.ca](mailto:doug@ofsaa.on.ca).

16. Upon receipt of a written complaint, OFSAA will:
  - a. record the date the complaint is received;
  - b. notify the Privacy Officer who will serve in a neutral, unbiased capacity to resolve the complaint;
  - c. 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;
  - d. appoint an investigator using OFSAA 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.
  - e. upon completion of the investigation and within 25 days of receipt of the complaint, the investigator will submit a written report to OFSAA;
  - f. notify the complainant of the outcome of the investigation and any relevant steps taken to rectify the issue, including any amendments to policies and procedures, within 30 days of receipt of the complaint.
  
17. An individual may appeal a decision made by OFSAA under this Policy, in accordance with OFSAA's policies for appeals.

#### **Approval and Review**

18. This Policy was approved by the Executive Council of OFSAA on September 23, 2005 and will be reviewed annually.