

XVII Privacy & Personal Information

At Squash BC, we respect the privacy of our members and clients.

The following is a brief summary of our privacy practices.

Why we collect personal information

If you are a Squash BC member or client, Squash BC has some basic information about you. We understand that some of this information is private, which is why we collect personal information only for the following purposes:

1. **To understand your needs and preferences.** We maintain a record of the services you receive from us, and we may ask for additional information so that we can serve you better.
2. **To manage and develop our operations.** For example, we analyze member usage of our services to help us manage them efficiently and plan for future growth.
3. **To meet legal and regulatory requirements.**

When do we disclose personal information?

There are a variety of circumstances where we may need to disclose some personal information about our members or clients. Here are some examples:

1. We may disclose a member's personal information to a person who, in the reasonable judgment of Squash BC, is seeking the information as an agent of the member.
2. We may disclose a member's personal information to a public authority or agent of a public authority, if in the reasonable judgment of Squash BC, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information. If a member calls 911, we will provide the member's name, address and telephone number to the emergency agency.
3. In conjunction with special offers or programs, we may disclose members' personal information to our program partners, or to third-party agents responsible for administering such offers or programs. Any such disclosure is made on a confidential basis with the member's express consent.

How do we protect your personal information?

In order to protect your personal information and your right to privacy, Squash BC:

1. will not collect, use or disclose personal information for any purpose other than those identified above, except with your consent;
2. will protect your personal information with appropriate security safeguards;
3. will protect the confidentiality of your personal information when dealing with other organizations
4. will strive to keep your personal information as accurate and up-to-date as is necessary for the purposes identified above; and
5. will honour any request you may make for access to your personal information.

What are your choices?

We would like to have your consent to continue to collect, use and disclose your personal information for the purposes identified above. However, you do have choices and can refuse or withdraw your consent as follows:

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You may have your name removed from our telephone, mail or e-mail lists. We use these lists to inform you of relevant services and other information that may be of benefit to you.

You may refuse to provide personal information to us. You may also withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice. However, in either case, this may limit our ability to serve you.

Squash BC Privacy Officer

Kevin Kydd
4867 Ontario St
Vancouver, BC
V5V 3H4
Phone 604-737-3084
Email: kkydd@squashbc.com

If you have any questions or concerns about our privacy practices, please call at 604-737-3084.

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Privacy Policy Statement

Squash BC will collect, use and disclose the personal information of members, staff members, volunteers and other individuals in a manner that protects such information, and will abide by the principles and requirements as specified in the Personal Information Protection Act (PIPA).

"Personal information" is considered to be any information that may identify an individual.

PIPA identifies certain exceptions to the general principles in the application of the Act.

Application

The principles and requirements set out in this policy apply to the collection, use and disclosure of personal information by Squash BC. Members of Squash BC, as separate legal entities, are required to enact their own privacy policies applicable to their specific organizations.

Summary of Principles

Principle 1 – Accountability

Squash BC is responsible for personal information under its control. To ensure Squash BC accountability and adherence to this policy, as well as timely response to questions of interpretation and possible complaints, the CEO of Squash BC will designate a senior staff member to assume the responsibilities of Privacy Officer. Public information regarding Squash BC's privacy policy and practices shall include current contact information for the Privacy Officer.

Principle 2 – Identifying Purposes for Collection of Personal Information

Squash BC shall identify the purpose for which personal information is collected at or before the time the information is collected. Collection of personal information will be limited to what is necessary to fulfill the purpose for which the data is being collected.

Principle 3 – Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of a member, staff member, volunteer or other individual are required for the collection, use or disclosure of personal information, except where inappropriate, including how and with whom any information may be shared. Members, staff members, volunteers and other individuals have the right to abstain from providing personal information on the understanding that if they choose, the purpose for which the information was being collected may not be fulfilled and/or that Squash BC may not be able to provide some services to the member, staff member, or volunteer.

Principle 4 – Limiting Collection of Personal Information

Squash BC shall limit the collection of personal information to that which is necessary for the purposes identified by the society. Squash BC shall collect personal information by fair and lawful means.

Principle 5 – Limiting Use, Disclosure, and Retention of Personal Information

Squash BC shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the member, staff member, volunteer or other individual, or as required by law. Squash BC shall retain personal information only for as long as necessary for the fulfillment of those purposes.

Principle 6 – Accuracy of Personal Information

Personal information shall be as accurate, complete and up to date as is necessary for the purposes for which it is to be used.

Principle 7 – Security Safeguards

Squash BC shall protect personal information by security safeguards appropriate to the sensitivity of the information. Personal information will be maintained in strict confidence and will be safeguarded through the use of administrative, physical and technological means such as database passwords and restricted access to secured storage cabinets and rooms, as appropriate.

Principle 8 – Openness to Concerning Policies and Practices

Squash BC shall make readily available to members, staff members, volunteers and other individuals specific information about its policies and practices relating to the management of personal information. Individuals from whom personal information has been collected have the right to access their own information to confirm accuracy and/or make appropriate changes, as needed

Principle 9 – Customer and Employee Access to Personal Information

Squash BC shall inform a member, staff member, volunteer and other individual of the existence, use and disclosure of his or her personal information upon request and shall give the individual access to that information. A member, staff member, volunteer and other individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Principle 10 – Challenging Compliance

A member, staff member, volunteer and other individual shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for compliance by Squash BC with the Squash BC Privacy Policy

The ten (10) principles, which form the basis of the Squash BC Privacy Policy, are interrelated and Squash BC shall adhere to the ten (10) principles as a whole.

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Privacy Officer

The Privacy Officer of Squash BC shall be accountable for ensuring that the collection and use of personal information complies with the Privacy Policy of Squash BC as well as any appropriate legislated requirements. The Privacy Officer shall address any actual or potential breaches of this Privacy Policy, or any complaints received from individuals from whom personal information has been collected.

Complaints

If any member, staff member, volunteer or other individual believes he or she has a possible complaint regarding the collection, use or disclosure of his or her personal information by Squash BC, such complaint shall be in writing and submitted to the Privacy Officer.

All complaints received shall be investigated and the outcome documented. The Privacy Officer shall manage the investigation process, delegating where appropriate. To ensure all relevant information is obtained in order to make a determination concerning a complaint, the Privacy Officer shall have access to all relevant Squash BC records pertaining to the circumstances of the complaint.

If an investigation reveals any inaccurate personal information, or any practices not in keeping with legislated requirements or this Squash BC Privacy Policy, such instances shall be remedied by Squash BC as promptly as reasonably possible.

All complaints will be dealt with thoroughly, and the Privacy Officer or delegate will provide an appropriate decision and written response within reasonable time frames. Such response shall outline the review process undertaken, changes (if any) to data handling practices or corrections to personal information made as a result of the complaint, as well as information for possible appeal of the Squash BC decision to the Information and Privacy Commissioner of BC.

Approved by the Board: May 27, 2006.