

WRESTLING CANADA PRIVACY POLICY



Background

Wrestling Canada is the sole governing body for amateur wrestling in Canada. In co-operation with thirteen provincial and territorial affiliates, the Canadian Amateur Wrestling Officials Association and Canadian Inter-University Sport, Wrestling Canada operates Wrestling Programming across Canada. Wrestling Programming means making all arrangements for amateur wrestling National Championships, national teams and international competition including choosing and training coaches and referees, deciding which athletes may participate at which level and establishing appropriate rules and regulations for amateur wrestling in Canada. As part of their Wrestling Programming activities, Wrestling Canada and its aforementioned affiliates also take responsibility for athlete/participant development, talent identification and scouting, gauging the success of certain programs in order that might they improve upon them, facilitating emergency contact, providing educational opportunities, research and maintaining regular electronic updates/contact with participants.

Purpose of this Policy

Wrestling Canada has developed this Privacy Policy for implementation beginning June 26, 2005. This Policy describes the way that Wrestling Canada collects, uses, retains, safeguards, discloses and disposes of the personal information of prospective members, members, and others including athletes, coaches, officials, support staff and volunteers.

This Policy describes the way that Wrestling Canada 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. Wrestling Canada 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 Wrestling Canada web site.

1. Accountability

1.1 Wrestling Canada will appoint a staff person (the “Privacy Officer”) whose responsibilities will include those of the implementation and monitoring of the Wrestling Canada Privacy Policy. The Privacy Officer will be responsible for Wrestling Canada’s 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 and the ultimate responsibility for Privacy issues will rest with the Wrestling Canada Board of Directors. The Privacy Officer may at his/her discretion enlist assistance from other staff 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 Wrestling Canada members and the public in general. Wrestling Canada’s Privacy Officer is Greg Mathieu he may be reached at gmathieu@wrestling.ca or by phone at 613-748-5686.

1.3 Wrestling Canada’s Privacy Officer will ensure that Wrestling Canada 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 Wrestling Canada shall be contractually obligated to adhere to the standards of Wrestling Canada.

1.4 Wrestling Canada 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 training in all facets of information management, including awareness of Wrestling Canada’s Privacy Policy and policies and procedures developed in accordance with the Policy.

2. Identifying Purposes, Type of Information Collected and Website

2.1 Wrestling Canada shall only collect the information reasonably necessary to conduct Wrestling Programming. Access to our Privacy policies and procedures will be readily available. Similarly, the process by which challenges may be made to Wrestling Canada’s compliance and/or adherence to the legislation in question shall be readily available and transparent. To obtain further information, contact Wrestling Canada’s Privacy Officer. Wrestling Canada’s Privacy Officer is Greg Mathieu he may be reached at gmathieu@wrestling.ca or by phone at 613-748-5686.

.2.2 Wrestling Canada collects personal information from prospective members, members, athletes, coaches, referees, support staff and volunteers for the purposes of conducting Wrestling Programming. Specifically:

- An athlete's name, address and date of birth are collected to determine that the athlete's geographical, age group and level of competition information are consistent with Wrestling Canada/ regulations.
- 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 an athlete'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 Wrestling Canada residency regulations.
- Educational information may be collected in order to ensure all Wrestling Canada 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 wrestling registrations may also be used for wrestling specific research purposes including but not necessarily limited to wrestling demographic type research.
- Affiliates. Wrestling Canada has numerous organizations which offer wrestling programs under the auspices of Wrestling Canada. These include the provincial/territorial affiliates, CAWOA and Canadian Inter-University Sport. Wrestling Canada discloses the personal information described in paragraph 2.2 to all of these organizations in order to facilitate Wrestling Programming and ensure compliance with rules and regulations.
- Potential and actual insurance claims and the subsequent investigation thereof.
- Appeals and Grievances as well as information collected to defend Wrestling Canada against legal action brought against Wrestling Canada.
- Administer the National Coaching Certification Program as it pertains to Wrestling Coaches.
- Manage our various awards, scholarship and recognition programs.

2.3 Wrestling Canada will endeavour through its affiliated organizations to advise potential registration candidates of the purpose for the collection of the data requested at the time of registration. 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 Wrestling Canada shall be maintained in its National Office.

2.4 Wrestling Canada will request individual 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 Wrestling Canada may also use information about an individual who accesses areas of www.wrestling.ca. 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 Wrestling Canada 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. Wrestling Canada 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 Wrestling Canada will use the personal information for the uses specified above in section 2 and in Section 3.2. By consenting to provide your information to Wrestling Canada, you are deemed to consent to our use of the information for the purposes of Wrestling 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 Wrestling Canada recognizes that wrestling 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, Wrestling Canada 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 Wrestling Canada. 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.

3.5 Wrestling Canada 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 Wrestling Canada 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 Wrestling Canada 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, Wrestling Canada 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 Wrestling Canada shall maintain documents for certain periods of time dependant upon necessity. More specifically:

- We will normally maintain registration data for a two 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 two year period after a member has left our programs.
- Affiliates. Wrestling Canada has numerous organizations which offer wrestling programs under the auspices of Wrestling Canada. As explained above, Wrestling Canada may from time to time share information with these Branches, associations, and leagues in order to facilitate Wrestling Programming and ensure compliance with rules and regulations.
- Wrestling Canada may from time to time enlist the services of third party vendors in order to provide wrestling programs, technical and support services. Prior to enlisting the services of these firms we will contractually commit them to treat your personal information consistent with the Privacy Policy of Wrestling Canada.
- Wrestling Canada 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.
- Wrestling Canada may at its discretion release personal information for the purposes of collecting debts which may be owed to Wrestling Canada.

5.3 Certain documents may be subject to legislated retention periods either federally or provincially. These will be respected at all times by Wrestling Canada.

6. Accuracy

6.1 Wrestling Canada 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 Wrestling Canada 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. Openness

8.1 Wrestling Canada 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 Wrestling Canada Privacy Officer who is Greg Mathieu and can be reached at gmathieu@wrestling.ca, or by phone at 613-748-5686.

8.2 The information available includes:

- The name address and phone number of the Wrestling Canada Privacy Officer.
- The forms (attached) which you may use to access your information or change your information.
- A description of the type of personal information held by Wrestling Canada and our general uses thereof. This includes:

- registration information, including name, date of birth, address, past clubs competed for, medical information and e-mail addresses
- information used for scouting, potential sponsorship opportunities, donors, alumni and information retained for the purposes of Wrestling Canada business contacts.
- Information that may be made available to affiliated organizations, and/or third party service providers, in accordance with the provisions of this Privacy Policy.

9. Individual Access

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

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

10. Challenging Compliance

10.1 Wrestling Canada has in place procedures for the resolution of grievances in the administration of its Privacy Policy.

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

10.3 Wrestling Canada shall investigate all complaints. If the complaint is deemed justified Wrestling Canada 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 Wrestling Canada Privacy Officer Greg Mathieu who can be reached at gmathieu@wrestling.ca, or by phone at 613-748-5686.



Request to Access or Correct Information

Personal information on this form is collected under Wrestling Canada's Privacy Policy and will be used to respond to your request. Instructions for completing this form are below.

About you

<input type="checkbox"/> Mr. <input type="checkbox"/> Mrs. <input type="checkbox"/> s. <input type="checkbox"/> Dr. <input type="checkbox"/> Miss	Last Name		First Name
Name of company or organization (if applicable)			
Mailing Address			
City or Town		Province	Postal Code
Telephone (daytime)	Telephone (evening)	Fax number	E-mail address

A. About your request

- What kind of information are you requesting access to?
 - General information (Please attach the fee of \$10.)
 - Personal information (No initial fee is required for personal information.)
- Do you want to: (a) receive a copy of the record **OR** (b) examine the record?

About the information you want to access

1. What records do you want to access? Please give as much detail as possible. (If you want access to your personal information, be sure to give all your previous names. For another person's information, you must attach proof that you can legally act for that person. If you need more space, please attach a separate sheet of paper.)

2. What is the time period of records? Please give specific dates. (See instructions provided below for details.)

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OR

B. About your request

- 1.. Whose information do you want to correct?
- Your own personal information
 - Another person's information (Please attach proof that you can legally act for that person.)

About the information you want to correct

1. What personal information needs to be corrected? Please give as much detail as possible. (Be sure to give the complete name that is in the records if it is different from the name given above. If you need more space, please attach a separate sheet of paper.)

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2. What correction do you want to make and why? (Please attach any documents that support your request.)

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Your signature

Signature	Date
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For Wrestling Canada use only

Date received	Request number:
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How to complete the form

You can access many Wrestling Canada records without making a request under the Privacy Act. To determine whether you need to make a request under the Policy or if you need help completing the form, contact the Wrestling Canada Privacy Policy Officer.

About you

Check the title by which you prefer to be addressed and enter your last name and first name. Then enter the name of the company or organization that you are representing, if applicable. Enter your complete mailing address and your daytime and evening telephone numbers. Wrestling Canada may need to contact you if they have any

questions about your request. If you have a fax number or E-mail address where correspondence can be sent, enter them in the spaces provided.

About your request

If you need help to find out what records Wrestling Canada has, please contact Wrestling Canada's Privacy Officer.

1. What kind of information are you requesting? Indicate whether you are requesting general or personal information.

General Information: If you are making a request for general information, there will be an initial fee of \$10. The records are provided when the fee is paid in full.

Personal information: If you are requesting records containing your personal information, you will have to provide proof of your identity before the records are released to you. If you are requesting records for another person, you will have to provide proof that you have the authority to act for that person. For example, you might provide proof that you are the person's guardian or trustee or that you have power of attorney for the person. There is no fee for accessing personal information unless the cost of producing copies is more than \$10. In these cases, you will be notified of the fee.

2. Do you want to receive a copy of the record or examine the record? Check the appropriate box?

About the information you want to access

1. What information are you requesting? Please be as specific as possible in describing the records. The more specific your request, the quicker and more accurately it can be answered. If you need more space, please continue your description on a separate sheet of paper and attach it to this request form.

If you are requesting your own personal information, please be sure that you give:

- your full name
- any other names that you have previously used; and
- any identifying number that relates to the records, such as your employee number, case number or other identification number.

If you are requesting another person's information, please give:

- the person's full name;
- another other name that person may have used on the records; and
- any identifying numbers for the person if you know them.

If you are requesting records for another person, you will have to provide proof that you have the authority to act for that person.

2. Enter the time period of the requested records. For example, if you are requesting records for the period January 1, 1993 to August 31, 1994, enter those dates in the space provided. If you want records from August, 1996 to present, enter "August, 1996 to present."

Your signature

Sign and date the form and send it to Wrestling Canada's Privacy Policy Officer at Unit 7, 5370 Canotek Road, Ottawa, ON K1J 9E6.