

**ORIENTEERING BC (Orienteering Association of BC)**

**PRIVACY POLICY AND PROCEDURES**

**Table of Contents**

Policy Statement..... 1

The BC Personal Information and Privacy Act.....1

Policy Application and Procedure..... 1

    1. Accountability..... 1

        1.1 Privacy Officer..... 1

    2. Purposes and Limitation of Collection and Disclosure of Personal Information...2

    3. Consent..... 2

        3.1 Consent Not Required..... 2

        3.2 Withdrawal of Consent..... 3

    4. Limiting Use and Disclosure..... 3

    5. Retention..... 3

    6. Accuracy..... 3

    7. Safeguards..... 4

    8. Individual Access..... 4

    9. Challenging Compliance - Submitting a Complaint.....4

        9.1 If Dissatisfied with Orienteering BC’s Handling of the Complaint.....4

    10. Openness..... 4

## **Policy Statement**

Orienteering BC (OBC) will comply with the **BC Personal Information and Privacy Act** (PIPA). OBC will only collect, use and disclose personal information for reasonable purposes as described in the **Policy Application and Procedure** below.

All OBC-affiliated clubs that collect membership information are also bound by this privacy policy.

This policy is to fulfill the obligation under PIPA to:

- a. develop and follow policies and practices that are necessary for the organization to meet the obligations of the organization under this Act (i.e. PIPA),
- b. develop a process to respond to complaints that may arise respecting the application of this Act, and
- c. make information available on request about
  - I. the policies and practices referred to in paragraph (a), and
  - II. the complaint process referred to in paragraph (b).

## **The BC Personal Information and Privacy Act**

Orienteering BC is a non-profit organization registered under the **Societies Act of British Columbia** and is regulated by the **Personal Information Protection Act** (PIPA) of British Columbia. PIPA describes how all private sector organizations must handle the personal information of the public and employees. For a member-based organization such as OBC, “public” includes individual members, competitors and participants from whom personal information may be collected.

Personal information means information that can identify an individual or information about an identifiable individual, including names, addresses, home contact information and photographs. Personal information does not include business contact information.

## **Policy Application and Procedure**

### **1. Accountability**

Orienteering BC is responsible and accountable for safeguarding personal information in OBC’s custody or under OBC control. A Privacy Officer is appointed annually who is responsible for privacy issues within the organization. Procedures for the handling of personal information, as well as dealing with any concerns or complaints received about personal information, have been developed and are outlined below.

#### **1.1 Privacy Officer**

The Orienteering BC Privacy Officer is:

Holly Hendrigan (hollyhen68@gmail.com)

The Privacy Officer has responsibility to:

- A. ensure OBC compliance with provisions of the *Personal Information Protection Act*;

- B. respond to any requests received for access to and/or correction of personal information, as well as any general inquiries or issues about OBC's compliance with PIPA. A response will be made within 15 business days of the request;
- C. manage the complaint process for privacy issues in accordance with the **Dispute Resolution Policy**;
- D. act as the OBC liaison with the *Information and Privacy Commissioner* during any investigation of a privacy complaint against Orienteering BC.

## **2. Purposes and Limitation of Collection and Disclosure of Personal Information**

PIPA allows personal information to be collected, used and disclosed for reasonable purposes. OBC collects and stores personal information to fulfill its obligations to its membership and to manage the programs and services it offers. The amount and type of personal information collected is limited to that which is reasonable and necessary to fulfill its stated purposes. All reasonable efforts will be made to ensure that the purposes for personal information collection are stated at the time collection takes place.

The purposes for which personal information is collected, used or disclosed include:

- a. complying with legal and regulatory requirements;
- b. providing and managing ongoing programs and services for members, competitors and other participants;
- c. assisting OBC-affiliated clubs in delivering programs and services at the local and provincial level;
- d. canvassing for volunteers to assist with association or event management;
- e. advertising and promotion before and after association events or meetings, including photographs and results lists;
- f. supporting Orienteering Canada in their delivery of programs and services at the national level;
- g. requirements from external sport agencies with which OBC has an organizational relationship or funding agreement, such as *viaSport* or *Sport BC*.

Only personal information necessary for providing membership, competitor or participant services shall be collected. For members this includes - first and last names, address, phone number, birthdate, gender (optional) and e-mail address (optional). For other competitors and participants, personal information collected is dependent on the information needs for the applicable event or program, and this will be apparent on the registration or participant form.

At the site of a competition, for safety reasons, the event director may request information as to the vehicle the person arrived in and a cell phone number, if available.

## **3. Consent**

Orienteering BC will obtain consent to collect, use or disclose personal information except when legally authorized or required by law to do so without consent. Consent can be express, implied, or given through an authorized representative such as parent or guardian, lawyer or agent.

### 3.1 Consent Not Required

The association may collect, use or disclose personal information without the consent of the individual for limited reasons. Consent will not be obtained when:

- A. collecting or disclosing the information is necessary for medical treatment and consent cannot be obtained in a timely way;
- B. collection of information is required or authorized by law, such as criminal record checks, employment history or references, and to be reviewed by the committee involved in the hiring or selection process;
- C. information is needed for a proceeding or an investigation, and getting consent might compromise the availability or accuracy of the information;
- D. information is collected at a competition or any public event in which the individual voluntarily participates.

### 3.2 Withdrawal of Consent

An individual may refuse to consent, or may withdraw consent, at any time by giving OBC reasonable notice, subject to legal or contractual restrictions. The individual's name and contact information may be removed from email, mailing, telephone contact lists or registration lists. Withdrawal of consent will limit the association's ability to communicate with, and provide membership services to, the individual. Withdrawal of consent for collection of personal information for an event list may prevent the individual from competing.

A competitor may request that their photograph not be posted on the OBC or affiliated club website, or be removed from the OBC or affiliated club website.

## **4. Limiting Use and Disclosure**

OBC will limit use of personal information to the purposes for which it is collected, except in the situation that disclosure of a member, competitor or participant's personal information may be made to a public authority or their agent, including law enforcement and/or medical authority, if, in the reasonable judgment of OBC, it appears that there is imminent danger to life or property, which could be avoided or minimized by disclosure of the information.

Member, competitor or participant information will not be sold by OBC for commercial purposes.

## **5. Retention**

Unless specifically requested otherwise by a member, personal information from members collected under this policy and its application is **kept for a maximum of 3 years from the last date of membership** in order to promote returning membership and maintain a relationship between the member and OBC.

Information collected for non-member competitors and other participants will be kept for a maximum of 1 year after that person's last involvement in an OBC event or program, in order to promote upcoming events and activities.

Competition results, with the individual's name, club affiliation (if any) and event result will form part of the archives of the association, unless an individual specifically requests that their result(s) be redacted from the archives.

Competition and/or event and/or group photographs will form part of the archives of the association and may include the identification by name and competition position or result of individuals in the photographs.

## **6. Accuracy**

Orienteering BC will make every reasonable effort to ensure that personal information it is using or disclosing is accurate and complete.

Individuals or their authorized agents may request that any errors be corrected by contacting the Privacy Officer. The individual or authorized agent may be first required to confirm their identity.

## **7. Safeguards**

Orienteering BC and its affiliated clubs will make reasonable administrative, technological and physical security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal, or similar risks to the personal information collected from members, competitors and participants, including reasonable protection from things like snooping, hacking, theft, loss, tampering, and/or copying of the information when not authorized.

OBC and its affiliated clubs will react immediately and move to render harmless any security breach, and to advise all affected persons of the security breach and steps being taken to prevent any further disclosure.

## **8. Individual Access**

Individuals have the right to access their own personal information that has been collected by OBC and its affiliated clubs. The individual may be asked to prove their identity before information is provided.

Individuals have the right to access:

- a. their personal information;
- b. information about the ways in which their personal information is or has been used; and
- c. the names of the individuals and organizations to which their personal information has been disclosed;

The request should be directed in writing to the OBC Privacy Officer and, if relevant to the Executive of the OBC-affiliated club. A response will be made within 15 business days of receipt of the request.

## **9. Challenging Compliance - Submitting a Complaint**

Should any complaints arise from the handling of personal information by the association or one of its affiliated clubs, a written complaint should be filed through the OBC Privacy Officer and in accordance with the current Orienteering Canada **Dispute Resolution Policy**.

#### 9.1 If Dissatisfied with Orienteering BC's Handling of the Complaint

If the Complainant is not satisfied with the handling of the complaint through the **Dispute Resolution Policy**, the Privacy Officer will inform the Complainant of the opportunity to request a review by the *Information and Privacy Commissioner of British Columbia*. The Privacy Officer will provide the required contact information to the Complainant wishing a review.

Orienteering BC will cooperate with the *Office of the Information and Privacy Commissioner of British Columbia* in the review.

#### **10. Openness**

The Orienteering BC **Privacy Policy and Procedures** are available to all members, and to the public, through the OBC website.

October 13, 2021