

PRIVACY & CONFIDENTIALITY

1. Purpose & Definitions

- 1.1 Ontario Karate Federation (OKF) has developed this Privacy Policy to describe the way that OKF collects, uses, retains, protects, transfers, discloses and disposes of personal information of Prospective Members, Members, Individuals, Staff and Volunteers.
- 1.2 This Policy describes the way that OKF will, subject to applicable legal requirements, adhere to applicable legislative requirements. The Policy follows the 10 Canadian Standards Association principles identified in the federal Personal Information Protection and Electronic Documents Act (PIPEDA). The Policy describes each principle and the method of implementing each. The collection of personal information shall be limited to that which is necessary for the purposes identified by OKF.

- 1.3 The following words shall have the following meanings under the Policy:

"Personal information" means any information about an identifiable individual.

"Business information" means business name, business address, business telephone number, name(s) of owner(s), officer(s) and director(s), job titles, business registration numbers (GST, RST, source deductions), financial status.

"Prospective Member" means the Dojo that has applied for Membership with the OKF through the relevant Membership Policy;

"Member" or "Member Karate Club" means a dojo that has been accepted as a Member of the OKF through the relevant Policy.

"Individual" means the person registered with a Member Karate Club.

"Express consent" means the individual signs the application, or other forms containing personal information, authorizing OKF to collect, use, and disclose the individual's personal information for the purposes set out in the application and/or forms.

"Implied Consent" means the organization may assume that the individual consents to the information being used, retained and disclosed for the original purposes, unless notified by the individual.

"Third Party" means a person or company that provides services to OKF in support of the programs, events, benefits, and other services offered by OKF, but does *not* include any Government office or department to whom OKF reports in the delivery of such programs, benefits or services.

2. Accountability

- 2.1 OKF will appoint a staff person (the "Privacy Officer") who shall be responsible for the implementation and monitoring of the OKF Privacy Policy. The Privacy Officer will be

responsible for compliance with the privacy principles and shall respond to requests for access to information in accordance with this Policy.

- 2.2 Members shall be able to address all concerns regarding compliance with the policy to the current Privacy Officer of OKF. Contact information will be available on the OKF website: www.onkarate.ca

3. Identifying Purpose

- 3.1 OKF is required to collect information reasonably necessary to conduct OKF programming and services. If the information required by OKF is not provided, the services, programming and opportunities available from OKF may be limited.
- 3.2 Personal information is any information about an identifiable individual other than business information, which is not protected under PIPEDA.
- 3.3 Personal information is collected by OKF for the following primary purposes of:
- a) Ensuring our athletes train and compete in an age appropriate environment;
 - b) Establishing athlete eligibility for selection to karate teams;
 - c) Establishing pertinent medical records and baseline performance data to assist coaching decisions in a provincial team competitive or training setting; or for use during emergency situations
 - d) Reporting non-identifying, demographic participation statistics to funders, sponsors and other authorized third parties;
 - e) Publishing athletes' names, genders, ages (where required), club affiliations on our web page or in results, news releases and ranking reports;
 - f) Tracking payment information with respect to dues and tournaments/events;
 - g) Making direct contact with members, volunteers and staff as necessary for the operation of the organization;
 - h) For any other reason the Board determines is necessary for the best interests of the OKF.
- 3.4 OKF will request individual permission for the use of any personal information collected which is extraneous to that which has been identified above, unless said usage is authorized and/or required by law.

4. Consent

- 4.1 An Individual's express, written consent will be obtained before or at the time of collecting personal information. The purpose of the collection, use or disclosure will be provided to the Individual at the time of seeking their consent. Once consent is obtained from the individual, OKF has the implied consent to collect or receive any supplementary information that is necessary to fulfill the same purposes. OKF requests personal information to collect and use primarily for registration and performance purposes. Personal registration information shall include name, address, date of birth, gender, club affiliation, OKF classification (if applicable), aboriginal declaration (if applicable), belt level, competitive level, language preference, whether athlete has a disability, address, e-mail addresses and telephone numbers. Personal performance information may also include medical history, allergies, injury history, current medications and anthropometric data. Personal registration and performance information is entered electronically into electronic databases that seek to maintain accuracy, security and restricted access. Hard copy lists are also kept in a restricted access location at the OKF offices.

- 4.2 By signing the forms, implied consent is granted by the individual to verify the information with third parties.
- 4.3 The above is not an exhaustive list and additional information may be required, when deemed appropriate. In the event that additional information is required and that is beyond the scope of what is detailed above, OKF will provide, without delay, a written explanation detailing precisely what information is required and how the collection of this data will contribute to Ontario Karate Federation providing better service to its members. Furthermore, members must express explicit consent prior to the collection of the additional information, unless they have given their implied consent as set forth in 4.1.
- 4.4 In addition to using personal information for Karate Programming purposes, OKF may from time to time wish to use personal information for the purposes of providing promotional opportunities, including by providing the information to National or International Karate Associations, other Provincial Associations, and Local Clubs.
- 4.5 Club Members are subsidiaries of OKF for reporting purposes under this Policy. Because Club Members have a more direct relationship with Participants, they shall obtain the consent of Participants to collect, and disclose to OKF, personal information solely for the purposes identified above or as identified in the future.
- 4.6 OKF recognizes that sport by its nature may cause physical injury. 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. OKF Participants and Prospective Participants are under no obligation whatsoever to supply this information and may refuse to do so without penalty. However, any Participant who does give this information to the OKF expressly consents to the OKF or its agents to use the information and disclose the information in an emergency medical situation.
- 4.7 If at any time Participants wish to withdraw consent to the use of their information for any purposes, they may do so by contacting the Club Member in writing and by contacting the OKF Privacy Officer in writing. OKF will do its best to accommodate the request in a timely fashion without diminishing the services it provides. The impact of withdrawal on any services will be provided upon receipt of the request.

5. Limiting Collection

- 5.1 The amount and type of information we collect shall be limited to that which is required to fulfill the purposes set out herein. All information will be collected fairly and lawfully within the criteria as set forth in OKF Privacy Policy.

6. Limiting Use, Disclosure and Retention

OKF shall maintain documents for certain periods of time dependent upon necessity. More specifically:

- 6.1 Personal information is kept by OKF for the duration of a Participant's participation in national, provincial or Club programs. When a Participant is no longer with the OKF, the

Participant will be registered as “inactive” and will only be re-activated for those Participants who re-register through their Club. Information will be retained for a period of six years after which it shall be purged entirely from OKF databases. Non-identifying information is retained for demographic, statistical and performance analysis purposes. Hard copy lists are kept at the OKF national office for a period of no more than two years, after which time they are destroyed.

- 6.2 OKF may from time to time enlist the services of third party vendors in order to provide or assist in the provision of OKF programs, technical and support services. By giving the information requested to the OKF, Participants and Individuals expressly consent to OKF giving personal information to these third parties, as necessary under the circumstances and for the purposes of their retention. Prior to enlisting the services of these entities we will contractually commit them to treat personal information consistent with PIPEDA and the OKF Privacy Policy.
- 6.3 As permitted under PIPEDA, OKF may use personal information without the individual’s consent, where:
- i) The OKF has reasonable grounds to believe the information could be useful when investigating a contravention of a federal, provincial or foreign law and the information is used for that investigation;
 - ii) An emergency exists that threatens an Individual’s life, health or safety;
 - iii) The information is for statistical study or research;
 - iv) The information is publicly available;
 - v) The use is clearly in the Individual’s interest, and consent is not available in a timely manner;
 - vi) Knowledge and consent would compromise the availability or accuracy of the information;
 - vii) Collection is required to investigate a breach of an agreement or Policy.
- 6.4 If disclosure is required for a purpose other than as set out in this Policy, OKF will obtain prior consent from the member or their parent/guardian. Signed consent forms are kept on file with OKF and/or clubs until such time as a member wishes to withdraw consent or leaves the organization.

7. Accuracy

- 7.1 OKF endeavours to ensure that any personal information provided by the Individual in his or her active file(s) is accurate, current and complete as is necessary to fulfill the purposes for which the information has been collected, used, retained and disclosed. Individuals are requested to notify OKF of any changes in personal or business information. Information contained in inactive files is not updated.
- 7.2 OKF will provide members with their personal information including that as it appears on the OKF Web Registration database within 30 days of receipt of a written request and ID verification by the Registrar. Members shall be able to review the accuracy and completeness of information and have it amended as appropriate.

8. Safeguards

- 8.1 Security safeguards have been implemented to ensure personal information is protected from unauthorized access, disclosure, copying, use or modification.
- 8.2 The registration database (currently under development) is designed and currently maintained by an independent contractor. Such contractor will ensure that the web registration, web application and database are hosted by reputable companies with appropriate security measures in place. The registration site will use an SSL certificate to encrypt all data passing through the internet. HTTPS (Hypertext Transfer Protocol Secure) will be used to provide encrypted communication and secure identification for the purposes of this system and payment transactions. Personal information will not be accessible by any standard means to the general public. Each club member's registrar/system administrator shall have access to the database and strictly to information pertaining to its own club's registered members.
- 8.3 OKF as the provincial governing body over karate in Ontario shall have access to personal information of all its registered members. OKF staff access is restricted to persons identified as OKF "Administrators" and information is made available to OKF staff members pursuant to the principles and purposes listed above.
- 8.4 OKF, its executive members, judges, referees and officials have a primary obligation to hold collected information in confidence and use the utmost discretion when collecting, storing and utilizing confidential member information. OKF will maintain appropriate, procedural and technical security with respect to the handling of confidential information.

9. Openness

- 9.1 OKF publicly discloses the methods by which personal information is handled. This information is readily available through the Privacy Policy, website or upon request by contacting the OKF Privacy Officer.

10. Individual Access

- 10.1 An individual who wishes to review or verify what personal information is held by OKF, or to whom the information has been disclosed (as permitted by PIPEDA), may make the request for access, in writing, to the Privacy Officer. Upon verification of the individual's identity, the Privacy Officer will respond within the time permitted under PIPEDA.

11. Complaints/Recourse

- 11.1 If an individual has a concern about OKF's personal information handling practices, a complaint, in writing, may be directed to the OKF's Chief Privacy Officer.
- 11.2 Upon verification of the individual's identity, OKF's Chief Privacy Officer will act promptly to investigate the complaint and provide a written report of the investigation's findings to the individual.
- 11.3 Where OKF's Chief Privacy Officer makes a determination that the individual's complaint is well founded, the Chief Privacy Officer will take the necessary steps to correct the offending information handling practice and/or revise OKF's privacy policies and procedures.

11.4 Where OKF 's Chief Privacy Officer determines that the individual's complaint is *not* well founded, the individual will be notified in writing.

11.5 If the individual is dissatisfied with the finding and corresponding action taken by OKF 's Chief Privacy Officer, the individual may bring a complaint to the Federal Privacy Commissioner at the address below:

The Privacy Commissioner of Canada
112 Kent Street
Ottawa ,ON K1A 1H3
Tel 1-800-282-1376

Website address:
www.privcom.gc.ca.

12. Website Privacy Statement:

12.1 OKF, through its website host, records visits to the OKF website and logs the following information for statistical purposes: the user's server or proxy address, the date/time/length of visits and the files required. The information is used to analyze server traffic. No attempt will be made to identify users or their browsing activities except where authorized by law. For example in the event of an investigation, a law enforcement agency may exercise their legal authority to inspect the internet service provider's logs. If email message is sent, the contact details are recorded and this information will only be used for the purpose for which it has been provided. OKF will not use emails for any other purpose and will not disclose it without specific consent. When users choose to join a mailing list their details are added to that specific mailing list and used for the stated purpose of that list only.

12.2 OKF is not responsible for the privacy practices or the content of the linked web sites and the other pages hosted by OKF on behalf of non-OKF agencies and organizations.

Disclaimer: The material on the OKF website is made available on the understanding that users exercise their own skill and care with respect to its use. Before relying on material in any important matter, users should carefully evaluate the accuracy, completeness and relevance of the information and should obtain appropriate professional advice relevant to their particular circumstances.

13. Responsibility:

Body	Action
OKF – Privacy Officer	Is the appointed designate for overseeing the data collection process and is ultimately accountable for compliance with this policy.
Karate Club System Administrators	Where Karate Clubs are disclosing or transferring personal information to OKF directly on behalf of a Participant or Individual, they shall keep a signed consent form on file for each karate-ka.
Provincial Karate Association or Special Association	Where the PKA's are disclosing or transferring personal information to OKF directly on behalf of a Participant or

	Individual, they shall keep a signed consent form on file for each karate-ka.
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14. Review

- 14.1 OKF will review this policy and procedures on an annual basis, or as required, and will make necessary adjustments to ensure that it meets the needs of all members.