



TAEKWON-DO

NOVA SCOTIA ASSOCIATION

PRIVACY POLICY



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BACKGROUND

1. The CTFI Taekwon-Do Nova Scotia Association (TNSA) is the provincial governing body of the International Taekwon-Do Federation (ITF) and the Canadian Taekwon-Do Federation International (CTFI) for amateur Taekwon-Do in Nova Scotia and provides services to its members.

PURPOSE

2. The TNSA recognizes the importance of, and is committed to, maintaining the accuracy, confidentiality, and security of personal information, because of and following the requirements of the Federal Personal Information Protection and Electronic Documents Act (PIPEDA).

3. The Personal Information Protection and Electronic Documents Act limits the collection, use, and/or disclosure of personal information. This Act is to support and promote electronic commerce by protecting personal information that is collected, used, or disclosed in certain circumstances, by providing for the use of electronic means to communicate or record information or transactions.

4. The TNSA Privacy Policy describes the way the TNSA shall adhere to all relevant legislative privacy requirements.

PERSONAL INFORMATION

5. Personal information is defined as information about an identifiable individual. Personal information includes that which relates to personal characteristics (age, gender, home address, phone number and ethnic background), health (health history and health conditions), or activities and views (religious, political, opinions, or evaluations). Personal information does not include business information (business address or business phone).

SCOPE

6. The TNSA's Privacy Policy sets out the principles and practices regarding the protection of personal information that is collected, used, and/or disclosed. Each Instructor and associated club as defined in the TNSA's bylaws are responsible for adopting a similar policy.

ACCOUNTABILITY

7. The TNSA is responsible for personal information under its control. Furthermore, all the TNSA's employees and volunteers who collect, maintain and/or use personal information are responsible for ensuring the collection, use and/or disclosure of this information is carried out in accordance with this policy and relevant procedures.

IDENTIFYING PURPOSES

8. The purpose for which personal information is collected shall be identified by the TNSA at or before the time the information is collected.
9. The TNSA shall only collect information pertinent to its Taekwon-Do sanctioned activity.
10. Privacy policies and procedures shall be made readily accessible and available.
11. Access to the challenge process regarding compliance and/or adherence to PIPEDA shall be made readily available.

TYPE OF INFORMATION COLLECTED

12. The TNSA collects personal information from consenting parties, typically its members, prospective members, coaches, officials, participants, administrators, volunteers, contractors, and vendors directly for the purposes of conducting Taekwon-Do sanctioned activity. This information may be obtained in person, by mail, over the phone/facsimile, email or electronically through the TNSA's website. Individuals provide the necessary information, as requested, based on their personal need. This information may include, but is not limited to:

- a. Names, addresses, phone and fax numbers, and email addresses collected for the purposes of facilitating membership communication related to the TNSA's upcoming events, programs, and activities;
- b. Information pertaining to athletes:
 - (1) Names, addresses, phone and fax numbers, email addresses, dates of birth, and historical information (athlete biography and statistics) of athletes may be collected to determine eligibility for sanctioned activity;
 - (2) Information concerning an individual's skill level and development, and feedback on programs may be collected to ensure present and future program success;
 - (3) Personal health information including provincial health card numbers, allergies, emergency contact and past medical history for use in the case of a medical emergency;
 - (4) Athlete information including height, weight, uniform size, feedback from coaches and trainers, performance results for athlete registration forms, outfitting uniforms, media relations, and various components of athlete and team selection; and
 - (5) Emergency contact information such as the names, addresses, phone numbers, and email addresses of players' parents, and information regarding educational information, skill levels, ability, and health may be collected to ensure compliance with the TNSA's residency regulations or activities are carried out in a safe and secure environment.

- c. The names, addresses, phone and fax numbers, email addresses of officials, coaches and administrators may be collected to determine geographical participation, level of certification and coaching qualifications, to ensure they are consistent with the TNSA, CTFI and ITF regulations;
- d. Passport numbers and Aero plan/Frequent flyer numbers for the purposes of arranging travel;
- e. Marketing information including attitudinal and demographic data on individual members to determine membership demographic structure and program wants and needs;
- f. Personal information collected for the purposes of the TNSA's registrations may also be utilized for Taekwon-Do specific research purposes, including but not limited to, Taekwon-Do demographic research;
- g. Performance data, typical of Taekwon-Do, may be collected for the purpose of promoting both the individual and competition;
- h. Names, addresses, phone and fax numbers, and email addresses for the purpose of providing insurance coverage, managing insurance claims, and conducting insurance investigations;
- i. Personal information (such as credit card information) that is required to undertake the supply of services or products and payment for said services or products an individual has requested in compliance with the law and regulatory requirements as part of normal business transactions and record keeping;
- j. Personal information required to administer and manage the service programs, or product requested and as needed, and to provide information to third party suppliers integral with Taekwon-Do's products and services;
- k. Banking information, social insurance numbers, criminal records check, personal reference information, and resumes required to administer the TNSA's hiring policy and payroll;
- l. Appeals and regulations challenges as well as information collected to defend the TNSA against legal action brought against the TNSA; and
- m. If a purpose has not been identified herein nor consent given for such purpose, the TNSA shall seek consent from the individual. This consent shall be documented as to when and how it was received.

CONSENT

13. The knowledge and consent of the individual are required for the collection, use and/or disclosure of personal information. The TNSA shall use personal information for only the specified uses. By consenting to provide information to the TNSA, the individual is deemed to consent to the use of the information for the purposes of TNSA's sanctioned activities and disclosure of the information to other affiliated organizations for the same purpose.

14. In addition to using personal information for the TNSA's sanctioned activities, the TNSA may use personal information for the purposes of providing promotional opportunities or Taekwon-Do specific communications and association updates. The TNSA shall provide an opportunity for the member to consent to these opportunities during the registration process.

15. The TNSA believes medical records, medical history and medical forms of the individual may be of assistance in an emergency and therefore the TNSA may request them and consider receipt of this information as consent for its subsequent use in an emergency medical situation.

16. Individuals may decline to have their personal information collected, used, or disclosed for specific purposes. If at any time individuals wish to withdraw consent, they may do so by contacting the TNSA Board of Directors or Sub-Committee. The TNSA Board of Directors or Sub-Committee shall explain the impact of withdrawal on any services provided by the TNSA. Taekwon-Do by its nature is a contact sport and injuries are to a certain extent inherent in the activities. The TNSA reserves the right to refuse participation for safety and well-being of the individual and public interest, if the personal information required is not disclosed.

17. The TNSA may collect personal information without consent where reasonable and permitted by law to do so.

LIMITING COLLECTION

18. The collection of personal information shall be limited to which is necessary for the purposes identified by the TNSA with the following criteria:

- a. All information shall be collected by fair and lawful means ; and
- b. All documents obtaining personal information shall have a collection, use, and/or disclosure of personal information statement contained therein, such as:
 - (1) ***“THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION. The TNSA collects, uses, and/or discloses only such information from individuals as is required for the purpose of providing services or information to them, managing databases, conducting research and such other purposes as described in the TNSA's Privacy Policy. The TNSA does not sell, trade, barter, or exchange for consideration any Personal Information obtained. The TNSA's collection, use and disclosure of personal information shall be done in accordance with its Privacy Policy, a copy of which is available at www.TNSAekwondo.ca.”***

- c. The TNSA shall not use any form or deception in gaining personal information from its members;
- d. The TNSA shall advise potential registration candidates, through its members or by reference to our website at www.TNSAekwondo.ca, of the purpose for the collection of the data requested at the time of registration;
- e. The TNSA shall ensure that all collectors of personal information are familiar with the potential use of the personal data;
- f. All personal data collected by the TNSA shall be maintained by the TNSA;
- g. All personal data shall not be used by members of the TNSA for unauthorized use;
- h. The TNSA shall request the individual for permission to use any personal data collected which is extraneous, to which has been identified above unless authorized by law.

LIMITING USE, DISCLOSURE & RETENTION

19. Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. The following will be adhered to:

- a. The TNSA shall limit the use of personal information collected to only those purposes identified within this Policy, except with the consent of the individual as legally required;
- b. The TNSA shall retain personal information in a manner that is consistent with its other statutory and legal requirements. The TNSA shall retain personal information only if is reasonably necessary to meet these requirements;
- c. TNSA's registration data and athlete information shall be retained for a period of three years after an individual has left the TNSA;
- d. TNSA's parental/family information shall be retained for a period of three years after an individual has left the TNSA;
- e. Information collected by the TNSA shall be retained for a period of three years after an individual has left a program;
- f. Employee information shall be retained for a period of seven years in accordance with Canada Customs and Revenue Agency Requirements;
- g. Personal health information shall be destroyed immediately when an individual chooses to leave the TNSA;
- h. Information pertaining to disciplinary matters shall be retained for a period of three years after an individual has left a program;

- i. Marketing information shall be immediately destroyed upon compilation and analysis of collected data;
- j. The TNSA has numerous affiliates, which offer programs under the auspices of the TNSA. The TNSA may share personal information with these affiliates and ensure compliance with rules and regulations;
- k. The TNSA may from time to time enlist the services of third-party vendors to provide Taekwon-Do programs, technical and support services. Prior to enlisting the services of these firms, the TNSA shall ensure treatment of personal information remains consistent with the TNSA's Privacy Policy;
- l. The TNSA may disclose to a government authority asserting lawful authority to obtain the information, where the TNSA has reasonable grounds to believe the information could be useful in the investigation of an unlawful activity, to comply with a subpoena or warrant or an order made by the court, or otherwise as permitted by applicable law;
- m. The TNSA may at some point be involved in the merger, transfer or reorganization of its activities. The TNSA may disclose personal information to the other party in such a transaction. The TNSA shall ensure that treatment of personal information remains consistent with the TNSA Privacy Policy;
- n. The TNSA may at its discretion release personal information for the purposes of collecting debts, which may be owed to the TNSA;
- o. The TNSA shall not sell, trade, barter, or exchange for consideration any personal information obtained; and
- p. Documents shall be destroyed via shredding and electronic files shall be deleted in their entirety.

ACCURACY

- 20. The TNSA shall ensure the accuracy of all information collected by the following:
 - a. Personal information shall be accurate, complete, and up to date as is necessary for the purposes for which it is to be used;
 - b. The TNSA shall make all efforts to ensure all entrusted personal information is maintained in an accurate manner;
 - c. The TNSA shall consider the interests of individuals in decision-making, ensuring decisions are not based on flawed personal information; and
 - d. The TNSA shall update information upon notification.

SAFEGUARDS

21. Security safeguards appropriate to the sensitivity of the information shall protect personal information through the following methods:
- a. The TNSA's employees are required to treat all personal information confidentially;
 - b. The TNSA maintains reasonably available safeguards that comply in all material respects with industry standards to guard personal information against unauthorized access, disclosure, copying, loss, destruction, use, or modification;
 - c. Methods of protection and safeguards to be employed shall include but in not limited to locked files, offices and storage areas, security clearances, and need-to-know access, as well as technological measures such as passwords, encryption, and firewalls;
 - d. The level of safeguards employed by the TNSA shall be related to the level of sensitivity of the personal information collected;
 - e. The following steps shall be taken to ensure security:
 - (1) Paper information is either under supervision or secured in a locked or restricted area;
 - (2) Electronic hardware is either under supervision or secured in a locked or restricted area. In addition, passwords are used on computers;
 - (3) Paper information is transmitted through sealed, addressed envelopes or in boxes by reputable courier/delivery companies;
 - (4) Electronic information is transmitted through a direct line or is encrypted; and
 - (5) External consultants and agencies with access to personal information shall provide the TNSA with appropriate privacy assurances.

OPENESS

22. An organization shall make readily available to individuals' specific information about its policies and practices relating to the management of personal information.
23. The TNSA shall publicly disclose upon request by contacting the TNSA Board of Directors the methods by which the TNSA handles personal information.
24. The information available may include but is not limited to:
- a. The name and phone number of the TNSA Board of Directors;
 - b. The required forms to access or change personal information; and

- c. A description of the type of personal information held by the TNSA and the general uses thereof.

INDIVIDUAL ACCESS

25. Upon request, individuals shall be informed of the existence, use and disclosure of their personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.
26. Subject to applicable legislation and upon reasonable notice in writing, the TNSA shall allow an individual access and review of the personal information held by the TNSA.
27. The TNSA shall provide the requested information in a timely manner and understandable format at either no expense or at nominal expense relating to photocopying and shipping expenses.
28. The TNSA shall disclose the source of the information when requested and provide an account of third parties to whom the information may have been disclosed.
29. Should the individual believe that any personal information is incomplete or incorrect; the individual may advise the TNSA to update the information. The information shall be corrected by the TNSA in a timely manner. If the information is subject to interpretation or is an opinion, the TNSA shall not change the record of information but may annotate the record to indicate the individual's views. Pertinent third parties shall also be made aware of the corrections.
30. The TNSA may request sufficient information to confirm an individual's identity before the release of personal information to the individual.
31. Individuals may be denied access to their personal information. Upon refusal, the TNSA shall inform the individual of the reasons for such actions and the associated provisions of PIPEDA. The denial of requests may be based upon:
 - a. The information being too prohibitively costly to provide;
 - b. The information containing reference to other individuals;
 - c. The information being subject to solicitor-client or litigation privilege; and
 - d. Legal, security, or commercial proprietary reasons.

CHALLENGING COMPLIANCE

32. An individual shall address any challenges concerning compliance with these principles and PIPEDA to the TNSA Board of Directors.
33. The TNSA shall have procedures in place to resolve possible grievances.
34. Upon receipt of a challenge, the TNSA shall acknowledge receipt of the complaint, clarify the nature of the complaint, and make the complaint procedures readily available and accessible.

35. The TNSA Board of Directors shall promptly review and investigate all allegations of policy violations and/or complaints. The review shall look at practices and procedures, which have occurred and determine the appropriate measures to be taken.

36. The Board of Directors shall notify the complainant of the investigation outcome and the measures taken to rectify the challenge within (30) days of the original complaint.

INTERNET PRIVACY

37. The TNSA respects the privacy of its internet users and shall protect that privacy as vigorously as possible through the following:

- a. The TNSA does not collect information that personally identifies individuals except when individuals provide such information on a voluntary basis;
- b. The TNSA shall only collect information voluntarily provided by the user and undertakes such information shall be kept strictly confidential. Individual information provided to the TNSA to gain access to its website if required shall not be sold or made available to a third parties;
- c. The TNSA reserves the right to perform statistical analyses of user behaviour and characteristics to measure interest in and use of the website to improve design and navigation. Only aggregated data shall be used for this sole purpose;
- d. Users should also be aware certain non-personal information and data might be automatically collected by the TNSA through the operation of “cookies”. “Cookies” are small text files that identify an individual computer’s browser entering a website. They allow the site to track browser’s movement through the site over several sessions. Through cookies, a website can recognize repeat users, facilitate the user’s access to and use of the site, and allow a site to track usage behaviour that allows content improvements;
- e. If individuals do not want a cookie placed on their computer by the TNSA, they may disable cookies altogether by modifying the preference section of their browser;
- f. If individuals wish to be informed of the appearance of cookies, they may turn on a warning prompt by modifying the cookie warning section; and
- g. Individuals should be cognizant that other sites linked to the TNSA website may not share the same policies as the TNSA.

PROTECTION OF PERSONAL INFORMATION

38. The TNSA Board of Directors are accountable for the TNSA’s policies and practices, with respect to the management of personal information, and is the individual to whom complaints and inquiries can be forwarded.

REVIEW & APPROVAL

39. This policy will be reviewed annually on the date of first approval.
40. This Policy was approved by the TNSA on the ___ day of _____, 20__.