Eclipse Track & Field Club is subject to the Personal Information Protection and Electronic Documents Act (PIPEDA) (“the Act”). PIPEDA requires Canadian for profits to adhere to ten (10) privacy principles to ensure fair information practices that in turn form the ground rules for the collection, use and disclosure of personal information. In accordance with the Act, Eclipse Track & Field Club is responsible for the protection of personal information and the fair handling of it at all times both throughout the organization and in dealings with third parties.

**APPLICATION**

(a)  This policy provides direction on how personal information is collected, used and disclosed within Eclipse Track & Field Club.

(b)  ECLIPSE TRACK & FIELD CLUB will comply fully with the principles and exceptions set out in the Act.

(c)    ECLIPSE TRACK & FIELD CLUB requires that its clubs establish, implement, and adhere to policies that are substantially like the ECLIPSE TRACK & FIELD CLUB Privacy Policy.

**PRINCIPLES OF FAIR INFORMATION PRACTICES**

**1.**    **Responsibility and Accountability**

Eclipse Track & Field Club is responsible for maintaining and protecting all personal information that it collects.

The ECLIPSE TRACK & FIELD CLUB Chief Executive Officer has the primary responsibility for ensuring compliance with the ECLIPSE TRACK & FIELD CLUB Privacy Policy as set out herein and has the authority to intervene on privacy issues that relate to any of ECLIPSE TRACK & FIELD CLUB’s operations. As such, the ED is responsible for:

(a)  Collecting, using and disclosure of personal information.

(b)  Responding to requests and general inquiries for personal information.

(c)   Responding to requests for correction to personal information.

(d)  Responding to complaints about the collection, use and disclosure of personal information by ECLIPSE TRACK & FIELD CLUB.

(e)  Explaining the purpose(s) for the collection, use and disclosure of personal information;

(f)    Explaining the procedure to withdraw consent and the consequences, if any, of such a withdrawal.

The ED may delegate any responsibilities set out herein to another ECLIPSE TRACK & FIELD CLUB employee or to an individual approved by the ECLIPSE TRACK & FIELD CLUB Board. All ECLIPSE TRACK & FIELD CLUB administrators, coaches, officials and employees, or any individual approved by the Board to handle any responsibilities set out herein, are required to understand and adhere to the ECLIPSE TRACK & FIELD CLUB Privacy Policy.

**2.**    **Identifying Purposes**

The purposes for which personal information is collected shall be identified by or on behalf of Eclipse Track & Field Club at or before the time the information is collected. This includes the reason(s) for collecting the information and how it will be used. If the reason(s) for collecting the information and/or how it will be used changes after the information is collected, ECLIPSE TRACK & FIELD CLUB will inform the affected individual(s) and obtain consent before the information is used.

**3.**    **Consent**

ECLIPSE TRACK & FIELD CLUB requires an individual’s consent for the collection, use, or disclosure of personal information:

(a)   Before or when any personal information is collected by or on behalf of ECLIPSE TRACK & FIELD CLUB, or when the reason(s) for collecting the information and/or how it will be used changes, ECLIPSE TRACK & FIELD CLUB will obtain consent from the individual whose personal information is collected, used or disclosed.

(b)   For an individual who is a minor, seriously ill, or mentally incapacitated, consent may be obtained from a legal guardian, or person having power of attorney.

(c)   Consent may be obtained in person, by phone, by fax, by mail, by email or by internet, or by any other reasonable method, whether express or implied.

Personal information may be collected from more than one source and combined.

**4.**    **Limiting Collection**

Eclipse Track & Field Club limits the information it collects to what is needed for specific purposes identified by the association at the time the personal information is collected. Information is collected by fair and lawful means.

**5.**    **Limiting Use, Disclosure, and Retention**

ECLIPSE TRACK & FIELD CLUB will limit the use and disclosure of the personal information it has collected to the purpose(s) for which it was collected, unless the individual otherwise consents, or the use or disclosure is authorized bylaw.

Where possible, ECLIPSE TRACK & FIELD CLUB will use contracts or other agreements to ensure the protection of personal information that has been collected by ECLIPSE TRACK & FIELD CLUB and that is transferred to a third party (i.e., Athletics Canada) for use, including but not limited to:

a.    The personal information transferred to a third party will be limited to what is needed by and for the purposes necessary for the third party to fulfil the contract or agreement.

b.    The third party will be required to refer to ECLIPSE TRACK & FIELD CLUB any requests for access to or complaints about the information provided.

c.     When the personal information is no longer required by the third party, the third party will be required to either return the information to ECLIPSE TRACK & FIELD CLUB or dispose of it in a manner acceptable to ECLIPSE TRACK & FIELD CLUB

d.    Personal information collected by or on behalf of ECLIPSE TRACK & FIELD CLUB will be retained only as long as necessary to satisfy the purpose(s) for which it was collected. Any personal information collected by or on behalf of ECLIPSE TRACK & FIELD CLUB that is no longer required for an identified purpose, or a legal requirement will be destroyed, erased, or rendered anonymous in a manner that will prevent improper access.

**1.**    **Accuracy**

ECLIPSE TRACK & FIELD CLUB will make efforts to keep the personal information collected as accurate, complete, and up to date as is necessary, considering the purpose(s) for which the information is collected and the interests of the individual.

**2.**    **Safeguards**

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

ECLIPSE TRACK & FIELD CLUB will make efforts to protect the personal information collected with appropriate safeguards and security measures:

(a)  Information may only be accessed by approved officials or employees, or by other persons designated as such by ECLIPSE TRACK & FIELD CLUB, and only to the extent necessary for the identified purpose(s).

(b)   Personal information will only be disclosed to a third party when:

i.        reasonable steps are taken to identify the individual requesting the personal information.

ii.        the individual requesting the information can establish his/her right to access the personal information requested; and

iii.        the proposed use of the personal information requested is consistent with the consent given with respect to the collection, use and/or disclosure of the personal information.

(c)   Personal information may only be stored, modified, or deleted by the Chief Executive Officer or his/her delegate as set out herein.

(d)   Physical safeguards include restricted physical access to ECLIPSE TRACK & FIELD CLUB offices and secure storage facilities.

(e)  Technological safeguards include restricted file access, computer passwords, firewalls, and file encryption procedures.

**3.**    **Openness**

Eclipse Track & Field Club shall make readily available to individuals’ specific information about its policies and practices relating to the management of personal information. Any requests or enquiries about this policy can be directed to the ECLIPSE TRACK & FIELD CLUB Chief Executive Officer.

**4.**    **Individual Access**

Any individual that has provided personal information to ECLIPSE TRACK & FIELD CLUB shall have access to that personal information collected, used or disclosed by or on behalf of ECLIPSE TRACK & FIELD CLUB. An individual may review, amend, or update the personal information collected about him/her.

If ECLIPSE TRACK & FIELD CLUB refuses access to an individual to their personal information collected, ECLIPSE TRACK & FIELD CLUB will provide to the individual the reason(s) for the refusal and any recourse available.

Where possible, a response to a request for access to personal information by an individual will be made within 30 days of the request.

ECLIPSE TRACK & FIELD CLUB will make every effort to provide access of any individual to his/her personal information at minimal or no cost. If a cost is anticipated to provide the information requested, ECLIPSE TRACK & FIELD CLUB will advise of the cost prior to disclosing the information.

**5.**    **Challenging Compliance**

An individual shall be able to address a challenge concerning compliance with the above principles to the Chief Executive Officer or his/her delegate as set out herein for the Association’s compliance.

ECLIPSE TRACK & FIELD CLUB will investigate and respond to all   concerns   about any aspect   of the   collection, use and disclosure of personal information, in a timely manner.  Where necessary, an individual will be advised of available avenues of complaint, including the Office of the Privacy Commissioner of Canada.

ECLIPSE TRACK & FIELD CLUB will take appropriate measures to correct any inaccurate personal information that is identified or to modify policies or procedures where necessary.