



PRIVACY POLICY

Purpose

1. This Privacy Policy (the “**Policy**”) is governed by the BC *Personal Information Protection Act* (“**PIPA**”), and describes the way that the Whistler Mountain Ski Club (“**WMSC**”) collects, uses, and discloses personal information of third parties in the course of its activities, implementing WMSC’s commitment to collect, use and disclose personal information responsibly. The WMSC Privacy Policy is based on the standards required by PIPA, and WMSC’s interpretation of these responsibilities. To the extent that the provisions in this Privacy Policy are inconsistent with PIPA, PIPA’s requirements shall govern.
2. A copy of this Policy will be posted on the WMSC website, www.wmsc.info and will be available upon request.
3. This policy deals with personal information about prospective members, members (including family members), staff, alumni, associate and volunteers.

Personal Information

4. Personal information is information about an identifiable individual and includes information that relates to their personal characteristics (e.g., gender, age, income, home address or phone number, ethnic background, family status), their health (e.g., health history, health conditions, health services received by them), their competitive performance or their activities and views (e.g., religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information, however, does not include business contact information (e.g., an individual’s business address and telephone number), which is not protected by PIPA.

Accountability

5. The WMSC Privacy Officer is responsible for our handling of personal information and ensuring that staff receive appropriate training on privacy issues. The Privacy Officer also handles personal information access requests and complaints. WMSC’s Privacy Officer is Blanca de la Rosa, the Club Office Manager, who can be reached at blanca@wmsc.info or by telephone at (604) 932-4644 ext 103.

Purposes

6. Personal information will only be collected, used and disclosed by WMSC to engage prospective members, members (including family members), staff, alumni, associate and volunteers in our activities and those of related ski organizations, and meeting and maintaining the highest standard of sport programming consistent with the

mandate and mission of WMSC. Personal information that may be collected, used or disclosed includes, but is not limited to, the following:

- a. name, address, phone number, cell phone number, fax number and e-mail address of athletes and family for the purpose of emergency contacts, managing insurance claims and receiving communications from WMSC in regards to programs, events, and activities;
- b. athlete's race results, fitness test results, and experience for database entry;
- c. credit card or chequing information for registration at programs, activities and events; travel administration and purchasing equipment and other products;
- d. date of birth, athlete history, and citizenship to determine eligibility, age group and appropriate competition level of athletes;
- e. athlete information including height, weight, uniform size, feedback from coaches and trainers, and performance results for media relations and components of athlete and team selection;
- f. video footage and photographs of individuals training and at competitions for the purpose of technical monitoring, coach/club review, training, educational purposes, sport promotion, media publications and posting on WMSC's website, displays or posters.
- g. competitive performance results and FIS/ACA points;
- h. criminal records check and related personal reference information for the purpose of implementing WMSC's programs;
- i. personal health information including provincial health card numbers, allergies, emergency contact, doctors' notes and past medical history for the purpose of medical emergency or reports relating to medical or emergency issues.
- j. passport numbers and Aeroplan/frequent flyer numbers for the purposes of arranging travel; and
- k. name and contact information of board members, volunteers and committee members for the purpose of communication within and between committees, volunteers, Board members and staff.

7. WMSC is a member of Alpine Canada Alpin. As a condition of such membership, WMSC discloses certain information as required by the Alpine Canada Alpin.
8. If a purpose has not been identified herein, WMSC will seek consent from individuals when personal information is collected, used or disclosed for a purpose not already consented to. This consent will be documented as to when and how it was received.

Indirect Collection

9. While WMSC usually collects information directly from individuals, sometimes information is collected from individuals by organizations associated with WMSC, principally other ski clubs or Alpine Canada Alpin, and is submitted to WMSC by those organizations to enable the individual's participation in the activities of WMSC. WMSC relies on other ski clubs or Alpine Canada Alpin to ensure collected information is accurate and that collection and submission of this information has been done in compliance with all applicable laws, including PIPA.

Consent

10. WMSC will obtain any required consent by lawful means from individuals at the time of direct collection, prior to the use or disclosure of the personal information. If the consent to the collection, use or disclosure was not obtained upon receipt of the information, consent will be obtained prior to the use or disclosure of that information. Prior to or as part of obtaining this consent, WMSC will disclose to individuals the purpose for which the personal information is to be collected, used or disclosed.

11. WMSC may collect, use, or disclose personal information without consent where reasonable to do so and where permitted under PIPA or by law. Without limiting the foregoing, WMSC may collect, use or disclose personal information in circumstances including the following:
 - a. personal information is collected by observation of a public sporting event at which the person appears voluntarily;
 - b. the information is necessary to determine an individual's suitability for an athletic position, standing or ranking;
 - c. the information is necessary to determine an individual's suitability for an honour, award or similar benefit, including a scholarship or bursary;
 - d. the collection, use or disclosure is necessary for the medical treatment of the individual and the individual is unable to give consent, or
 - e. where the collection, use, or disclosure of the information is clearly in the interests of the individual and consent cannot be obtained in a timely way.

12. By providing personal information to WMSC, and participating in its programs and activities, individuals are considered to have consented to the use of the information in the manner and for the purposes identified in this policy.

13. WMSC will not, as a condition of a product or service, require an individual to consent to the collection, use or disclosure of information beyond that required to fulfill the specified purpose.

14. An individual may withdraw consent to the collection, use or disclosure of personal information at any time, subject to legal or contractual restrictions. The Privacy Officer will advise the individual of the implications of such withdrawal. Depending on the circumstances, if consent is withdrawn the individual may not be able to continue their participation in certain programs and activities of WMSC.

Limiting Collection

15. All personal information will be collected fairly, by lawful means and for the purposes as specified in this policy or as specified at the time of collection. WMSC will not use any form of deception to obtain personal information.

Limiting Use, Disclosure and Retention

16. Personal information will not be used or disclosed by WMSC for purposes other than those for which it was collected or as provided herein, except with the consent of the individual or as required or permitted by law.
17. Information disclosed to a third party with consent from the individual will be protected by appropriate arrangements with the third party to limit use and disclosure.
18. Personal information will be retained for a minimum of one year after its last use by WMSC. After that time, information will be retained for such further periods as may be appropriate and necessary for the business purposes of WMSC pursuant to best practices and standards, or as required by law, after which time it will be securely destroyed or erased in accordance with WMSC's internal records policies and procedures.

Accuracy

19. WMSC will use accurate and up-to-date information as is necessary for the purposes for which it is to be used, to minimize the possibility that inappropriate information may be used to make a decision about an individual. As indicated above, WMSC may rely on other ski clubs and Alpine Canada Alpin for the accuracy of information collected by them and remitted to WMSC.

Safeguards

20. WMSC is obligated to protect personal information by making reasonable security arrangements against such risks as unauthorized access, loss, copying, theft, collection, use, disclosure or disposal. Personal information is protected by security safeguards appropriate to the sensitivity of the information. Methods of protection and safeguards include, but are not limited to, locked filing cabinets, restricted access to offices, security clearances, need-to-know access and technological measures including the use of passwords, encryption and firewalls.

Openness

21. WMSC will make available on request information about its policies and practices relating to the management of personal information. This information is available through WMSC's web site or upon request by contacting the Privacy Officer.
22. The information available to the public includes:
 - a. the name or title, address and telephone number of WMSC's Privacy Officer;
 - b. any forms that may be used to access personal information or change information;

- c. a description of the type of personal information held by WMSC, including a general statement of its approved uses;
- d. a copy of any brochures or other information that explain the organization's policies, standards, or codes; and
- e. contact information regarding other clubs and organizations such as Alpine Canada Alpin to which WMSC may disclose personal information in its custody or control

Individual Access

- 23. Subject to PIPA and all applicable laws, upon written request, and with assistance from WMSC, an individual may be informed of the existence, use and disclosure of his or her personal information and may be given access to that information. As well, an individual may be entitled to be informed of the source of the personal information along with an account of third parties to whom the information has been disclosed unless this information shall or may not be disclosed by law.

- 24. Requested information will be disclosed to the individual within 30 days of receipt of the written request at no cost to the individual, or at nominal costs relating to photocopying expenses, unless there are reasonable grounds to extend the time limit.

- 25. If nominal fees will be charged for the production of personal information under WMSC's control, the organization will provide the applicant with a written estimate of the fee prior to providing the information.

- 26. If personal information is inaccurate or incomplete, it will be amended as required. An individual may request correction of his or her personal information that is under the custody or control of WMSC. Subject to reasonable cost and timeliness, if appropriate WMSC will correct the information within 30 days of receiving a written request in the approved form. If corrections are not made, WMSC will annotate the personal information under its control, indicating that the correction was requested but not made.

- 27. An individual may be denied access to his or her personal information if:
 - a. this information is prohibitively costly to provide;
 - b. the information contains references to other individuals;
 - c. the information cannot be disclosed for legal, security or commercial proprietary purposes;
 - d. the information is subject to solicitor-client or litigation privilege; or
 - e. the law otherwise requires or permits the information not to be disclosed.

- 28. Upon refusal, WMSC will inform the individual the reasons for the refusal and the associated provisions of PIPA.

Challenging Compliance

29. An individual may challenge the WMSC's compliance with PIPA, by submitting a complaint in writing to :

Whistler Mountain Ski Club Attn: Privacy Officer
2028 Rob Boyd Way, Whistler, BC V0N 1B2

30. Upon receipt of a written complaint, WMSC will:

- a. record the date the complaint is received;
- b. acknowledge receipt of the complaint by way of telephone conversation or email;
- c. notify the Privacy Officer who will clarify the nature of the complaint at an early stage and seek to informally resolve the complaint;
- d. if unresolved, appoint an investigator using WMSC personnel or an independent investigator; and
- e. notify the complainant of the outcome of the investigation and any relevant steps taken to rectify the complaint, including any amendments to policies and procedures, usually within 60 days of receipt of the complaint.

31. An individual may request a review of WMSC's compliance with this policy by contacting the British Columbia Information and Privacy Commissioner at www.oipc.bc.ca.

32. WMSC may, from time to time, review and revise this Privacy Policy and its practices, and update as required.