



# Field Hockey Nova Scotia Privacy Agreement

January 2011

## Background

Field Hockey Nova Scotia [FHNS] is a non-profit, non-government federation, dedicated to helping Nova Scotians achieve better health and a sense of achievement through active participation in all forms of Field Hockey throughout their lives.

We strive to provide leadership, direction and support to our members, in their delivery of Field Hockey opportunities to Nova Scotians. Field Hockey Nova Scotia also serves to act as the voice for Field Hockey, promoting the benefits of health, personal development and achievement for all its participants.

## General

Purpose of the Policy: FHNS recognizes the importance of privacy and is committed to protecting personal information that is collected, used, disclosed and retained by our organization. The FHNS privacy policy showcases how the personal information is handled and safeguarded.

Field Hockey Nova Scotia has implemented this privacy policy to assure Nova Scotians that their personal information is being protected as governed by the Personal Information Protection and Electronics Documents Act [PIPEDA]. PIPEDA "applies to every organization in respect of personal information that ... the organization collects uses or discloses in the course of commercial activities". Although Field Hockey Nova Scotia does not engage in commercial activity with its membership/contact lists, Field Hockey Nova Scotia is committed to adopting the principles of PIPEDA to take every measure to protect its members.

Field Hockey Nova Scotia is committed to taking every necessary measure to respect and protect your privacy. This privacy policy describes the responsible manner in which Field Hockey Nova Scotia collects, uses, discloses, safeguards and disposes of personal information. This policy strictly models the principles and is compliant with the provisions of the PIPEDA.

## Definitions [as defined in the PIPEDA]

Personal information: information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization.

Commercial Activity: any particular transaction, act or conduct or any regular course of conduct that is of a commercial character, including the selling, bartering or leasing of donor, membership or other fundraising lists."

## Principles

### 1) Accountability:

Field Hockey Nova Scotia has designated Mario DeMello accountable for assuring Field Hockey Nova Scotia's overall compliance with the principles of the PIPEDA. As the designated Privacy Officer, Mario DeMello, will be responsible for monitoring the personal information collected, data security, ensuring all staff are trained appropriately on privacy issues and responsibilities and handling personal information requests and complaints.

However, other individuals within Field Hockey Nova Scotia may be responsible for the day-to-day collection and processing of personal information and may act on behalf of the designated individual(s).

The Privacy Officer can be contacted at:

153 Donaldson Avenue - Halifax - NS - B3J 1G6  
Tel: (902) 497-1150 Fax: (902) 455-7638  
e-mail: [president@fieldhockey.ns.ca](mailto:president@fieldhockey.ns.ca)

Field Hockey Nova Scotia practices and procedures that give effect to the principles include:

- a) Procedure to protect personal information
  - (i) Training Field Hockey Nova Scotia volunteers about the organization's policy and procedures on privacy,
  - (ii) Maintaining data on a secured network server,
  - (iii) Providing access to contacts via individual login passwords that determine your access level.
- b) Procedure to receive and respond to complaints and inquiries
  - (i) Privacy Officer will respond by means of a written report within 30 days of receiving the complaint
- c) Training staff and communicating information to staff about the organization's policies and practices; and
- d) Information explaining Field Hockey Nova Scotia policies and procedures.
  - (i) Privacy policy made available by hard-copy and/ or e-version
  - (ii) Sportnovascotia.ca web page link to privacy policy.

## **2) Identifying Purposes:**

Field Hockey Nova Scotia, orally or in writing, will identify why the personal information is being collected at the time or before the information is collected. If personal information has been collected for a purpose not previously identified, the new purpose will be identified to the individual prior to use, unless the new purpose is required by law.

Field Hockey Nova Scotia will only collect that minimal information necessary to satisfy the purposes that have been identified and will not use or disclose the information for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Field Hockey Nova Scotia will only retain the personal information for as long as necessary to fulfill the stated purposes.

Reasons Field Hockey Nova Scotia collects personal information:

- a) To email out newsletter,
- b) Annual promotion of program, service or event, or promotion of new programs, services or events that are created,
- c) To audit special programs,
- d) To track success of specific programs.

Personal information that is no longer required to fulfill the identified purposes will be destroyed. Field Hockey Nova Scotia's guidelines and procedures to govern the destruction of personal information can be found under the Limiting Use, Disclosure, and Retention principle.

## **3) Consent:**

Field Hockey Nova Scotia will request the knowledge and consent of the individual prior to the collection, use, or disclosure of personal information, except where inappropriate.

However, in certain circumstances, consent with respect to use or disclosure may be sought after the information has been collected but before use (for example, when Field Hockey Nova Scotia wants to use information for a purpose not previously identified).

Field Hockey Nova Scotia will not require an individual to consent to the collection, use, or disclosure of information beyond that required to fulfill the explicitly specified and legitimate purposes.

By providing personal information to Field Hockey Nova Scotia, individuals are consenting to the use of the information for the purposes identified in this policy.

An individual may withdraw consent to collection, use or disclosure of personal information, subject to legal or contractual restrictions and reasonable notice [10 business days]. The organization shall inform the individual of the implications of such withdrawal.

Field Hockey Nova Scotia's form of consent may vary, depending upon the circumstances and the type of information. In determining the form of consent to use, Field Hockey Nova Scotia will take into account the sensitivity of the information.

## **Consent Forms:**

- a) Personal Information Written Consent Acknowledgement Form - to be used prior to collection of information; is an application completed by the applicant and given to Field Hockey Nova Scotia.
- b) Personal Information Oral Consent Acknowledgement Form- to be used prior to collection of information; is personal information taken from an applicant and filled out by a Field Hockey Nova Scotia volunteer.
- c) Personal Information Access/Correction Request Form - allows applicant access to his or her personal information.
- d) Personal Information Change/Additional Request Form - For Field Hockey Nova Scotia use when the original purpose(s) for obtaining personal information has changed.
- e) Personal Information Opt Out Request Form - allows applicant to withdraw consent or opt out of personal information being collected.
- f) PSO and FHNS PlaySport.ca Privacy Agreement - lays out terms for both parties. In certain circumstances personal information can be collected, used, or disclosed without the knowledge and/or consent of the individual. For example, legal, medical, or security reasons may make it impossible or impractical to seek consent.

#### **4) Limiting Collection**

Field Hockey Nova Scotia will not collect personal information that is not necessary for the purposes identified by the organization. Field Hockey Nova Scotia will collect information by fair and lawful means and will not collect personal information indiscriminately. Field Hockey Nova Scotia will specify the amount and the type of information collected which will be limited to information that is necessary to fulfill the purposes identified.

#### **5) Limiting Use, Disclosure, and Retention**

Field Hockey Nova Scotia will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

No personal information will be sold or shared with third parties or external sources, unless consent has been given.

Field Hockey Nova Scotia guidelines and procedures with respect to the retention of personal information are determined on a program-to-program basis.

When personal information is no longer required to fulfill the identified purposes aforementioned, the personal information will be destroyed, erased, or made anonymous.

Field Hockey Nova Scotia guidelines and procedures for the destruction of personal information is as follows:

- a) Paper Shredder for hard copy financials and sensitive data
- b) Direct removal from database records, immediately wipes record from storage

#### **6) Accuracy:**

Field Hockey Nova Scotia, to the best of our ability, will use personal information that is accurate, complete, and up-to-date 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 the individual.

#### **7) Safeguards:**

Field Hockey Nova Scotia has in place security safeguards appropriate to protect the sensitivity of the information. The security safeguards shall protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification.

Field Hockey Nova Scotia Volunteers are governed by policies and procedures in regards to personal information and are adequately aware of the importance of maintaining the confidentiality of personal information. Field Hockey Nova Scotia will use appropriate care in the disposal or destruction of personal information, to prevent unauthorized parties from gaining access to the information.

Field Hockey Nova Scotia protects personal information regardless of the format in which it is held. The method Field Hockey Nova Scotia uses to protect personal information includes the following:

- a) Any personal information identifiable on paper is always under the supervision of a Field Hockey Nova Scotia Assigned person or is safeguarded in a protected/restricted area.
- b) All computers containing personal information are under the supervision of a Field Hockey Nova Scotia or are safeguarded in a protected/restricted area.
- c) All computers containing personal information are secured with passwords.
- d) All personal information that must be transmitted will be done through sealed and addressed envelopes/boxes using only reputable courier/delivery companies.
- e) All Field Hockey Nova Scotia Executive are trained in how to collect, use and disclose of personal information and are familiar with the Field Hockey Nova Scotia Privacy Policy.
- f) Field Hockey Nova Scotia will confirm with third party organizations, prior to allowing access to personal information that Field Hockey Nova Scotia has collected, that they have appropriate privacy procedures established to protect personal information.
- g) Employees who send sensitive personal information via faxes will use the necessary procedure safeguards and ensure the fax has a fax cover sheet.

## **8) Openness**

Field Hockey Nova Scotia will make readily available to individuals specific information about its policies and practices relating to the management of personal information. This specific information can be obtained via the Privacy Officer, our Field Hockey Nova Scotia Website [[www.fieldhockeynovascotia.ca](http://www.fieldhockeynovascotia.ca)] or this privacy policy.

Field Hockey Nova Scotia will make the following information available:

- a) The name or title, address, and telephone number of the Privacy Officer who is responsible for dealing with complaints or inquiries regarding policies and practices;
- b) The means of gaining access to personal information held by Field Hockey Nova Scotia;
- c) A description of the type of personal information held by Field Hockey Nova Scotia;
- d) A copy of the Field Hockey Nova Scotia Privacy Policy and any other information that explains the organization's policies, standards, or codes; and
- e) What personal information is made available to related organizations.

## **9) Individual Access**

Upon request, Field Hockey Nova Scotia will inform an individual of the existence, use, and disclosure of his or her personal information and will provide access to that information.

Field Hockey Nova Scotia will respond to an individual's request within a reasonable time.

Any individual has the right to challenge the accuracy and completeness of the information and have it amended as appropriate.

In certain situations, Field Hockey Nova Scotia may not be able to provide access to all the personal information it holds about an individual. The reasons for denying access will be provided to the individual upon request. Reasons for denying the individual access to personal information may include:

- a) The 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 reasons; and
- d) The information is subject to solicitor-client or litigation privilege.

When an individual successfully demonstrates the inaccuracy or incompleteness of personal information, Field Hockey Nova Scotia will amend the information as required.

Where appropriate, the amended information shall be transmitted to third parties having access to the information in question.

## **10) Challenging Compliance**

An individual may file a complaint concerning compliance with this Privacy Policy to the Privacy Officer listed above. Field Hockey Nova Scotia will respond to a complaint via the following procedure:

- a) Record and date the written complaint when received.
- b) This complaint will be forwarded to the Privacy Officer.
- c) The Privacy Officer will attempt to resolve the complaint by investigating the complaint or appointing another investigator within ten business days of the complaint being filed.
- d) The Privacy Officer/appointed investigator will have access to all files necessary to carry out an objective and impartial investigation.

- e) Within 30 days of receipt of the complaint, the Privacy Officer will complete the investigation and notify the complainant of the decision by means of a written report explaining the reasons for the decision. The Privacy Officer will include in the report any changes or corrections to Field Hockey Nova Scotia's Privacy Policy.

This statement will have to appear on every form members complete:

I consent to the collection and use of my personal information as stated in the Field Hockey Nova Scotia Privacy Policy. I understand that the Field Hockey Nova Scotia Privacy Policy is accessible at [www.fieldhockeynovascotia.ca](http://www.fieldhockeynovascotia.ca).