



Canadian Fencing Federation

Privacy Policy

Preamble

The Canadian Fencing Federation (hereafter referred to as the CFF) is committed to complying with the applicable privacy legislation in Canada, at both the federal and provincial/territorial levels.

Purpose

1. This policy describes the CFF's objectives and policies with regard to the protection of personal information.
2. This objective of this policy is to assist members of the CFF community to understand how their personal information is managed by the CFF.

Scope and Applicability

3. This policy applies to all the CFF participants as defined below.
4. This Privacy Policy supersedes any previous privacy policies of the CFF effective the date of approval of the policy by the Board of Directors, and may be considered part of the CFF's foundational policy framework. It is therefore subject to change as directed by the CFF Board of Directors in order to protect the interests of the CFF and CFF Participants.

Definitions

5. The following definitions are presented in the context of the CFF Privacy Policy:
 - a. CFF Participants: Without limiting the reach of the policy, CFF participants for the purpose of this policy are defined as:

- i. All individual athletes, or those eligible for nomination to, or forming part of, any team participating in sport competitions over which the CFF has jurisdiction;
 - ii. All persons working with those teams or athletes, including coaches, medical and paramedical personnel, and other support persons;
 - iii. CFF employees and persons under contract with the CFF;
 - iv. All fencing coaches certified and/or recognised by the CFF;
 - v. All fencing officials and referees certified and/or recognised by the CFF;
 - vi. All CFF license-holders (and their parents, grandparents and/or guardians if minor);
and
 - vii. Members of the CFF Board of Directors, officers of the CFF, staff members of the CFF, committee members and volunteers working for or serving with or on behalf of or appointed by the CFF.
- b. Chief Privacy Officer of the CFF: for the purposes of this policy, the Executive Director is deemed to be the Chief Privacy Officer for all matters related to the protection of personal information.

Exceptions

6. If the policies and procedures outlined in this document do not address a specific situation, individuals and/or organisations within the fencing community to whom this policy applies are expected to contact the CFF's Chief Privacy Officer for guidance or clarification.

Principles for the Application of the Privacy Policy

7. The Privacy Policy of the CFF is designed to comply with the applicable federal and provincial/territorial privacy legislation of Canada, and incorporates the following ten principles:

1. Accountability
2. Identifying Purpose
3. Consent
4. Limiting Collection
5. Limiting Use, Disclosure and Retention
6. Accuracy of Personal Information
7. Safeguarding Personal Information
8. Openness
9. Access to Personal Information
10. Challenging Compliance

8. If the Privacy Policy is changed at some point in the future, those changes will be included in updates to this Privacy Policy, wherever it is made available, in order to ensure that it is known and understood what information is collected, how it is used, and how it is protected. When personal information that has been collected is to be used for a purpose not previously identified, the new purpose will be identified prior the implementation of any new use policy or procedure.

Accountability

9. The CFF is responsible for maintaining and protecting the personal information under its control. Accountability for this function within the CFF is held by the Chief Privacy Officer.

Identifying Purpose

10. The CFF will identify to an individual the purposes for which personal information is collected at or before the time the information is collected. Generally, the CFF collects personal information for the following purposes, although there be other circumstances that require such information to be collected and used:

- a. To manage and develop the CFF's business and operations, including personnel and employment matters; and
- b. To meet legal and regulatory requirements.

11. The CFF collects the following personal information from individuals during the course of normal commercial activities. The information obtained includes but is not limited to:

- a. Name;
- b. General contact information;
- c. Sex/gender;
- d. Registration numbers and categories (provincial, international);
- e. Category of engagement with the CFF;
- f. Conflict of interest (actual or perceived);
- g. Results;
- h. Disciplinary actions and sanctions; and

- i. Transaction activity with the CFF, including those related to registration or financial obligations.
12. Any information collected and retained by the CFF is used primarily to determine an individual's entitlement to CFF services. In addition, this information may be used to:
 - a. Enable individuals to take advantage of any CFF services;
 - b. Inform individuals about CFF products and services which may differ from what is currently accessed;
 - c. Enable CFF staff and others to better understand an individual's requirements to receive specific CFF services; and
 - d. Enable the CFF to develop, enhance or improve services to members.

Consent

13. An individual's knowledge and consent are required before the CFF is allowed to collect, use or disclose his or her personal information, except where inappropriate. Where possible, the CFF will obtain consent directly from the individual concerned at the time of collection. After having provided consent, an individual has the right to withdraw that consent at any time by providing reasonable notice to the CFF's Chief Privacy Officer.
14. By participating in CFF-sanctioned events, registration services or accessing any CFF on-line information services, using other CFF member services, or otherwise indicating approval, individuals consent to the collection and use of their personal information for the purposes identified in this Privacy Policy.
15. The CFF will not normally require consent to the collection, use or disclosure of personal information beyond that are required to provide services to the individual whose information has been collected. If an individual wishes to withdraw consent, or to opt out of the uses or disclosures of information previously collected for the purposes identified in this Privacy Policy, that individual may do so by contacting the Chief Privacy Officer. If such a request requires the deletion of registration information, the CFF will no longer be able to provide that individual with any services.
16. In limited circumstances, the CFF may use or disclose personal information without the knowledge or consent of the individual, for example, for purposes of debt collection, breaches of agreements, as required by governmental bodies acting with authority, or as authorized or required by applicable legislation.

Limiting Collection

17. The CFF collects only the information that is necessary for the purposes outlined in this Privacy Policy.

Limiting Use, Disclosure and Retention

18. The CFF does not use personal information for purposes other than those for which it was collected, except with an individual's consent or as required by law. Once personal information is no longer required to fulfill the identified purposes or other legal requirements, it will be destroyed, deleted or made anonymous.

19. The CFF sometimes uses the services of external firms to assist in communicating with individuals (e.g., surveys and mail distribution) or as a means of providing more effective and efficient services to these individuals (e.g., technology support), and for auditing purposes, but only to the extent required for the provision of services to members of the CFF community. The external suppliers are contractually obligated to keep the information confidential, to use the information only for the purpose requested, and to destroy the information when it is no longer required.

20. The CFF does not sell personal information to a third-party organization. In certain circumstances, however, basic contact information may be shared amongst members, to facilitate on-going communication.

21. Personal information is retained only as long as necessary for the fulfillment of the purposes stated in this policy.

Accuracy of Personal Information

22. Personal information is kept as accurate, complete and up-to-date as necessary for the purposes for which it is to be used. Individuals are encouraged to provide updates to their personal information as changes occur, to enable the continuity of service provision.

Safeguarding Personal Information

23. Personal information, whatever its form, will be protected by security safeguards appropriate to the sensitivity of the information. The safeguards will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. The measures of protection include:

- a. Physical measures, for example, locking filing cabinets and restricted access to offices;

- b. Organizational measures, for example, the issuance and control of security or identity passes, and limiting access to the personal information on a “need-to-know” basis;
- c. Technological measures, for example, the use of passwords and encryption; and
- d. Procedural measures, for example, the shredding of sensitive personal information.

Openness

24. The CFF is committed to being open about its policies and practices with respect to the handling of personal information. The Privacy Policy is available on the CFF website, and additional information may requested directly from the Chief Privacy Officer.

Access to Personal Information

25. Individuals may request a copy of their personal information held by the CFF by submitting a written request to the Chief Privacy Officer. Acceptable proof of identification is required before such information is given out. If an individual who has requested his/her own personal information, and considers that the information held by the CFF is inaccurate, the individual may contact the Chief Privacy Officer requesting that the information be reviewed and, if inaccurate, changed.

Challenging Compliance

26. An individual can challenge compliance with the above policy by providing written details of the challenge to the Chief Privacy Officer.

Review and Approval

27. This policy is to be approved by the Board of Directors of the CFF and shall be reviewed on a regular basis, as and when required.

Recommended for Approval:



May 23, 2018

Brad Goldie
President, Canadian Fencing Federation

Date

Approved by the Board of Directors, 23 May 2018