



## HOCKEY EASTERN ONTARIO MINOR

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### Memorandum

#### 6.7 PRIVACY POLICY

##### PURPOSE

This Privacy Policy describes the way that HEO Minor and HEO collects, uses, retains, safeguards, discloses and disposes of the personal information of prospective members, members, and others, including: players, coaches, referees, managers and volunteers. It is subject to applicable legal requirements.

##### EFFECTIVE DATE

Rev. 1

January 2015

##### ACCOUNTABILITY

HEO shall designate the President, Vice President and Executive Director as the Privacy Officer(s) for HEO and they are jointly accountable to the Board of Directors for compliance with the Policy. The Privacy Officer(s) will be responsible for HEO's compliance with the Personal Information Protection and Electronic Documents Act(PIPEDA) privacy principles and for responding to access requests in accordance with this Policy. The Members, their Associations and Clubs affiliated with HEO, shall designate and identify to HEO and membership, an individual or individuals as their Privacy Officer(s) and identify an appropriate hierarchy of contact and accountability for information. The name(s) of the individuals(s) listed as HEO Privacy Officers(s) shall be made available upon request or by visiting the HEO website and Handbook. In the case where neither of these individuals are available upon request, a delegate may act on their behalf. HEO's Privacy Officer will ensure that HEO is accountable for all personal information in its possession including that which may be transferred to a third party. Third party organizations who handle information on behalf of HEO shall be contractually obligated to adhere to the standards of the HEO Privacy Policy. HEO will implement internal policies which will facilitate adherence to the Privacy Policies including but not limited to the following:

Type of Personal Information	Purpose of Collecting
A player's name, place of residence and date of birth	To determine that the player's geographical, division and level of play information are consistent with HEO and Hockey Canada regulations
Historical information concerning past teams played.	To determine if any Hockey Canada Transfer regulations apply.

A player's skill and development level and feedback on programs honours and awards received.	To measure the success of our programs in order that we may better plan future programs.
A player's parents; name, address, number(s), email	To facilitate emergency contact telephone information and to ensure addresses and fax. compliance with Hockey Canada residency regulations.
Educational information	To ensure all Hockey Canada residency regulations have adhered to.
Email addresses and fax	To facilitate membership communication
Skill levels, ability, emergency and health concerns.	To ensure our activities are carried out contacts in a safe and secure environment.
Resumes	To identify potential future employment candidates
Registration information	To conduct research studies but not necessarily limited to hockey demographic type research. To be made available to related organizations, Branches, associations, leagues and/or third party service providers.

HEO will implement:

- i) Security measures at all levels designed to protect personal information in its possession.
- ii) Procedures designed to respond to complaints and/or inquiries.
- iii) Staff training in all facets of information management, including awareness of HEO's Privacy Policy and subsequent policies and procedures developed in accordance with the Policy.

**Identifying Purposes**

HEO shall only collect information necessary to conduct hockey programming. Access to us Privacy Policies and procedures will be readily available. Similarly, the process by which challenges may be made to HEO's compliance and/or adherence to the legislation in question shall be readily available.

HEO collects personal information for the purpose of providing hockey programming, which endeavors to meet the individual needs of each participant. HEO recognizes that hockey by its nature is a contact sport and injuries are to a certain extent, inherent in the game. Medical records, medical history and medical forms of the individual may be of assistance in an emergency situation and as such may be requested. While participants are under no obligation whatsoever to supply this information and may refuse to do so without penalty, HEO will consider receipt of this information as consent for its subsequent use in an emergency medical situation. HEO will request individual permission for the use of any data collected which is extraneous to that which has been identified above, unless said usage is authorized by law.

The information will be collected via a verbal and/or written agreement to allow the individual submitting information an opportunity to opt-out or opt-in to the use of personal information for third parties.

All information is kept for the duration of seven years or as long as required to fulfill the purposes identified, unless permission is obtained from the member providing the information to hold it for

a different length of time. HEO will endeavor through its Members to advise potential registration candidates of the purpose for the collection of their data at the time of registration. This information will be made available by reference to the HEO website or Handbook. HEO will further endeavor to ensure that all collectors of the personal information are familiar with the potential use of the data. Any other purpose of collection will be stated at time of collection.

All data collected by HEO shall be maintained in the HEO office or that of the Members all of which are listed on the HEO website.

HEO may also use information about user access to secure areas of the HEO website. Information you are asked to provide during your use of the HEO website may include your name, address, e-mail address, age, sex and will be treated within the same parameters as other personal information collected by Hockey Canada through other means. It will always remain your choice to provide information in certain fields.

### **Consent**

HEO will use the personal information for the uses specified in section 2.

All members of HEO have the ability to consent to the use of their personal information on a yearly basis. A member of HEO agrees that the act of registering constitutes implied consent to such use of their personal information by HEO, its Members and their Associations and Hockey Canada.

Beginning with the 2004-2005 season registration, members will have the opportunity to choose whether information other than name, address, birth date, and information concerning registration, discipline, and honours and awards received may be kept for a longer period than otherwise mentioned.

If at any time you wish to withdraw your consent to the use of your information for any purposes, you may do so by contacting the HEO Privacy Office at any time, subject to legal or contractual restrictions and by providing reasonable written notice. Previous consent will be removed from the HEO data base upon receipts of a written request and that request will be communicated to all Members and their Associations within 10 business days.

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

### **Limiting Collection**

HEO and its Members shall only collect personal information in a fair and lawful manner as set forth in this Privacy Policy.

HEO shall not indiscriminately collect information. The amount and type of information collected shall be limited to that which is required to fulfill identified purposes.

HEO will not use any form of deception in gaining personal information from its members.

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

HEO, its Members and their Associations shall limit the use of personal information collected to purposes that are listed in Section 3. (Identifying Purposes) and 4. (Consent) and will not disclose the information for other purposes except as requested and permitted by applicable law.

Prior to enlisting the services of third party organizations HEO will contractually commit those parties to treat your personal information in a manner consistent with this Privacy Policy.

HEO may disclose your personal information to a government authority that has asserted its lawful authority to obtain the information or where the association has reasonable grounds to believe the information could be useful in the investigation of an unlawful activity, or to comply with a subpoena or warrant or an order made by the court, person, or body with jurisdiction to compel the production of the information or otherwise as permitted by applicable law.

HEO may at its discretion release personal information for the purposes of collecting which may be owed to the Association.

HEO shall retain documents concerning registration, performance activities, discipline, events and honours and awards received for specific periods of time dependent upon necessity or destroyed accordingly when it is deemed appropriate. More specifically:

- i) Registration data will be retained for a three-year period after an individual has left the HEO programs in the event that an individual chooses to return to HEO programs after leaving.
- ii) Parental/Family information will be maintained for a similar three-year period after a member has left our program.

Other personal information will be retained by HEO for regulated timeframes as requested by legislation governing its operation and/or the information provided, after which time (unless consent is given to keep information for a longer period) the information will be destroyed in a secure manner.

If there is no legislative requirement to retain other information, it will be kept for a minimum of 24 months from the time it was provided.

### **Accuracy**

HEO shall strive to ensure to the extent that it can that the information entrusted to it is maintained in an accurate manner. Members will have the ability to view and review data provided on their application for membership at any time through the Hockey Canada and HEO Hockey Management System (HMS) or equivalent in Member jurisdictional areas. HEO shall attempt to maintain the privacy interests of the individual and attempt to maintain the privacy interests of the individual and attempt to ensure that decisions are not made for or about an individual based on personal information that may be flawed.

### **Safeguards**

Security safeguards will be implemented to ensure your personal information is protected from theft as well as unauthorized use or access, disclosure, copying, or modification thereof.

All information collected by HEO will be considered highly sensitive. As such, a high level of security will be practiced at all times.

Methods of protection and safeguards to be employed shall include but in no way be necessarily limited to locked files, offices and storage areas, security clearances and need to know access as well as technological measures such as passwords and encryption.

These measures will be subject to yearly review by HEO and its Privacy Officer(s) to ensure the best methods possible are being utilized to maximize effectiveness.

### **Openness**

HEO publicly discloses the methods by which personal information is handled. This information is readily available through its Privacy Policy, on its website or upon request by contacting the HEO Privacy Officer.

The information available includes:

- i) The name address and phone number of the HEO Privacy Officer.
- ii) The forms (attached) to access your information or change your information.
- iii) A description of the type of personal information and our general uses thereof (review chart in section 2.5 for more details).

If any participant shall have a question regarding the personal information collected, the investigation may be initiated to the Member - Privacy Officer, then to HEO.

### **Individual Access**

Subject to applicable legislation, upon request by the individual concerned HEO shall disclose whether or not it actually holds personal information on an individual. HEO shall disclose the source of this information when requested and provide an account of third parties to whom the information may have been disclosed.

HEO may request sufficient information to confirm your identity before releasing your personal information to you.

Subject to applicable legislation, HEO shall endeavour to provide this information within 30 days of receipt of the request for information and only charge nominal fees for the purpose of satisfying its expenses incurred in the supply of requested information. This information shall be provided in an understandable format.

A member may challenge the accuracy and completeness of the information through written request and any inaccurate information which may be so validated, shall be corrected and any third parties shall be notified of the corrections as per section 4. (Consent).

### **Challenging Compliance**

HEO has established this Policy as a set of procedures for the resolution of grievances in the administration of its Privacy Policy.

Prospective members and staff may challenge HEO's compliance with this Policy by contacting the HEO Executive Director or/and Privacy Officer(s) responsible for their geographic area. Upon receipt of a complaint HEO shall make available the complaint procedures which will be simple and easy to access.

HEO shall investigate all complaints made to it. If the complaint is deemed justified, HEO shall take the appropriate steps to ensure that compliance is achieved and will make changes to its policies to allow for compliance in the future.

All complaints shall be addressed to the HEO Privacy Officer. HEO policies and procedures must be adhered to in order to have the challenge dealt with in an appropriate and timely fashion.

### **Privacy Statement**

The information requested on this form is required by HEO and its Members (their executive, employees, coaches and volunteers) for the purpose of rules and regulations administration by HEO including notification of any events or other activities. In order to do so, HEO, its Members and Hockey Canada may, if required request proof of a player's identity, address and date of birth.

### **OPT-OUT**

HEO may use or disclose the player's personal information collected on this form to third parties for the purposes of offering additional products and service that may be of interest. As the above mentioned player, or the player's legal guardian, if you don't wish HEO to use player personal information for this purpose, you may notify the HEO Executive Director in writing or by making the appropriate discovery in the registration process.

### **Privacy Statement for Documents other than Registration Cards**

HEO is committed to respecting and protecting the privacy of our Members, their Associations, individual members, their families and our employees. The information collected on this form will be used for the sole purposes of administering the Rules, Regulations and By-Laws of HEO.