

<b>viaSport Policy</b>	
<b>Policy Type:</b>	Governance
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<b>Revised:</b>	-
<b>Reviewed:</b>	Every 2 years
<b>Policy Name:</b>	Privacy Policy

## 1) POLICY STATEMENT

viaSport British Columbia (viaSport) takes privacy and data protection seriously, and are committed to ensuring the proper use, protection and security of personal information in our custody or control.

## 2) PURPOSE

As a private organizational society, viaSport is governed by and must comply with the [Personal Information Protection Act \(PIPA\)](#), BC legislation which governs the collection, use and disclosure of personal information by organizations in a manner that recognizes both the right of individuals to protect their personal information and the need of organizations to collect, use or disclose personal information for purposes reasonable person would consider appropriate in the circumstances.

PIPA is enforced by the [Office of the Information and Privacy Commissioner for British Columbia \(OIPC BC\)](#). The OIPC BC is the independent office responsible for investigating complaints, guiding compliance, auditing privacy practices, and educating on privacy rights and responsibilities. This Privacy Policy was built based on OIPC's guidance from PIPA.

This Privacy Policy ('the Policy') establishes the standards and guidelines for the protection of personal information and operational procedures taken to uphold security and protection, in alignment with regulatory and legal requirements to ensure that privacy protection is built into all initiatives, programs, and services at viaSport. This policy has been developed in alignment with the guidance provided by OIPC BC.

## 3) SCOPE

This policy applies to all employees, contractors, and third parties ('Personnel') who handle, process, or have access to personal or sensitive information owned by viaSport.

## 4) DEFINITIONS

**Personal information:** any recorded information about an identifiable individual other than their business contact information. Personal information includes information that can be used to identify an individual through association or inference, including but not limited to:

- a) the individual's name, personal addresses, telephone numbers, or email addresses
- b) the individual's race, national or ethnic origin, colour, or religious or political beliefs or associations
- c) the individual's age, sex, gender identity, sexual orientation, marital status or family status
- d) an identifying number, symbol or other particular assigned to the individual
- e) the individual's fingerprints, blood type or inheritable characteristics

- f) information about the individual's health care history, including a physical or mental disability
- g) information about the individual's educational, financial, criminal or employment history
- h) anyone else's opinions about the individual
- i) the individual's personal views or opinions, (including, depending on the circumstances, their opinions about someone else)

## Consent

**Express consent** is when a business provides notification so that the person is fully aware of how and why their personal information is being collected. Express consent occurs when an individual willingly agrees to his or her personal information being collected, used, and disclosed as notified. Express consent can be verbal or written.

**Implied consent** does not require notification because the purpose for collecting the relevant personal information is obvious, and does not need any further explanation for the individual to be fully informed. Implied consent occurs when an individual does not expressly give consent, but volunteers information for an obvious purpose and a reasonable person would consider it appropriate in the circumstances. Implied consent can also be verbal or written.

## 5) STANDARDS

viaSport's Privacy Policy follows the standards provided under the [ten principles of privacy protection](#) and acts in compliance with the regulations and guidelines under [Personal Information Protection Act \(PIPA\)](#) of British Columbia.

## 6) GUIDELINES

The following guidelines provide Personnel with a framework of considerations and guidance when building operational processes and when managing information and data in the day-to-day activities of the Society.

### 6.1 PURPOSES FOR THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

viaSport collects, uses and discloses personal information as necessary to fulfill the following purposes:

- a) for the purpose of processing and administering a funding application by an individual or an organization;
- b) to process applications from coaches when signing up for courses and provide support and services associated with courses and training, as requested;
- c) to send updates and newsletters to individuals in accordance with their preferences;
- d) to respond to requests for services and to improve our services;
- e) to respond to inquiries, concerns and comments received through our Contact Us page;
- f) to contact and correspond with you and process your instructions;
- g) to process payments;
- h) to maintain contact information for stakeholders and partners;
- i) to de-identify the information for statistical analysis and research purposes to enable us and our funders to better understand our own operations and important issues in the sporting sector in British Columbia and Canada;
- j) to understand how our Website is used and to improve our Website;

- k) to comply with our contractual obligations or enforce our legal rights;
- l) for legal and business purposes such as for administrative, operational, tax, recruitment, and risk management purposes, or other legal compliance purposes; and
- m) as otherwise permitted or required by law.

#### 6.2 DATA COLLECTION AND CONSENT:

- a) Before starting a new project, complete a privacy assessment to outline any risks and the risk mitigation plan. More details can be found in viaSport Operational Procedures.
- b) The collection of personal information is minimized to what is necessary for fulfilling legitimate business purposes.
- c) Obtain express or implied consent from individuals before or at the point of collection of personal information.
- d) Clearly communicate the purpose of data collection and how it will be used.
- e) When data is not obtained directly from individuals (i.e., data shared with viaSport through a third party), establish explicit terms for data sharing and consent.

#### 6.3 DATA USE AND PROCESSING:

- a) Process personal data only for the purposes specified during the collection process and within the bounds of the law.
- b) Ensure that personal data is accurate, relevant, and up-to-date.
- c) Do not use personal data for unauthorized or secondary purposes without proper consent.

#### 6.4 DATA SECURITY:

- a) In alignment with PIPA, establish reasonable security arrangements to ensure proper safeguarding and protection of privacy against unauthorized collection, use, and disclosure of personal information.
- b) Follow the guidelines outlined in operational procedures to minimize privacy risks.
- c) Regularly audit, update and patch systems and software to address security vulnerabilities.

#### 6.5 ACCESS CONTROL:

- a) Limit access to personal data to authorized personnel based on the principle of least privilege<sup>1</sup>.
- b) Implement strong authentication mechanisms to ensure only authorized individuals can access sensitive data.

#### 6.6 DATA RETENTION AND DISPOSAL:

- a) Retain personal data for the period necessary to fulfill the purposes for which it was collected, unless legal requirements dictate otherwise.
- b) If data is used to make decisions impacting the individual, the retention period will be a minimum of one year.

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<sup>1</sup> The principle of least privilege is a security concept that states that individuals or systems should be granted the minimum level of access or permissions required to perform their job functions effectively. In other words, individuals should have access only to the data and systems necessary for their specific tasks and nothing more.

- c) Establish procedures for secure disposal of personal data.

#### 6.7 THIRD-PARTY MANAGEMENT:

- a) Select third-party service providers and partners who adhere to similar privacy and security standards.
- b) Conduct due diligence before sharing personal data with third parties.
- c) Use data processing agreements to ensure third parties process personal data in accordance with our privacy standards.
- d) When deemed appropriate and needed, enter into non-disclosure agreements with potential vendors before sharing information.
- e) Ensure third-party service provider contracts include confidentiality provisions and that adherence to this Privacy Policy.

#### 6.8 DATA SUBJECT RIGHTS:

- a) Respect individuals' rights to access, rectify, and erase their personal data as required by applicable data protection laws.
- b) Establish mechanisms and provide access for individuals to exercise their data rights and respond to their requests in a timely manner.

#### 6.9 PRIVACY NOTICE AND TERMS OF USE:

- a) Provide an overview of how personal data is collected, used, and disclosed by viaSport.
- b) Outline the types of information gathered, the purposes for use, and the expectations individuals can have regarding the handling of their data.
- c) Ensure individuals' rights to understand and control their personal information.
- d) Promote transparency, accountability and trust through display on viaSport website and where applicable.
- e) For details, please refer to [viaSport Privacy Notice and Terms of Use](#).

## 7) OPERATIONAL PROCEDURES

[viaSport's Privacy Operational Procedures](#).

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