

# **POLICY**

on

# Personal Information Protection & Electronic Documents Act (PIPEDA)

# Regulation

As of January 1, 2004, the federal government is enforcing the PIPEDA (Personal Information Protection & Electronic Documents Act). The Act regulates the collection, use and disclosure of personal information.

Swim Ontario, in essence, is asking its members to allow personal information such as name, address, date of birth, e-mail addresses, telephone numbers, etc., on their families to be entered electronically on a nation-wide database. Hard copy lists are also on file at the Swim Ontario office. They are kept in a secure location to which no one other than the Swim Ontario staff has access. The Executive Director is the appointed designate for overseeing the data collection process and is ultimately accountable for compliance with this policy.

## **Purpose of Information Collection**

This information is necessary to allow our athletes to train and compete in an age appropriate environment, and to have personal information on hand when direct contact is necessary. The latter also applies to volunteers and coaches. Swim Ontario also collects donor information for Swim-A-Thon tax receipt purposes.

## Security & Safeguards

The database (Swimming Canada database) is secure, and personal information is not accessible to the general public (see Appendix A). Each club's registrar has access to the database only as it pertains to club members. Swim Ontario, as the parent organization,

can access personal information on all its registered members. Swimming Canada uses the database to determine total registration numbers, rankings, as well as meet results, for the entire country. Passwords are mandatory for all identified groups to access required information.

## Limited Use of Information

Personal information is not divulged to anyone without prior permission from the family. Swimming Canada also accesses the information for statistical and tracking purposes.

Meet managers need name and date of birth (DOB) for swimmers entering competitions. Names, ages, and event results are published electronically as well as in hard copy format after the conclusion of competitions. Other personal information is not made available at any time without prior contact with the coach or the parents/guardians of under-aged swimmers.

## **Consent & Withdrawal Thereof**

Swim Ontario requires consent from each family to continue with this practice. Each club registrar should keep a signed consent form (see attached) on file for each registered member (athletes, volunteers, coaches, etc.) until such time at which a member wishes to withdraw consent or leaves the organization. Withdrawal of consent for the use of personal information must be received immediately in writing by the Executive Director of Swim Ontario.

Personal information is kept on file for the duration of a member's participation in Swim Ontario programmes. At the end of each season (August 31), the data is archived and will only be re-activated for those members who re-register with the association. After six (6) years, all outdated information will be purged entirely from the Swimming Canada database. Hard copy lists are kept at the Swim Ontario office for a period of no more than two years, after which time they are destroyed.

#### **Individual** Access

Swim Ontario will be happy to provide registered individuals with personal data as it appears on the Swim Canada database within 30 days of receipt of a written request.

#### **Complaints**

Complaints are to be directed to the Executive Director of Swim Ontario who will attempt to remedy each situation as it arises expeditiously and in strict confidence.

#### Appendix A

#### SECURITY OF DATA (as per Swimming Canada Database Systems)

\* Clubs must provide Provincial Section with an officially signed user id request form. There is one registrar per club authorized to use account/password combination.

\* All user id's are either expired or deleted on Aug 31 each year at the Provincial Section Office's (PSO) discretion.

\* Swim Ontario has chosen to remove a Club's affiliation until it has settled all outstanding invoices and fees, and has paid the upcoming season's club fee. The club cannot access its data until the club affiliation is valid.

\* Website encryption is provided using a 128 bit encryption certificate.

\* Site resides behind a router/firewall which only permits access to the web server via restricted ports. Although port 80, the public http protocol port, is open other ports are locked down to prevent "backdoor" access.



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# **CONSENT FORM**

Swim Ontario's policy with regard to the PIPEDA is attached. Please read it and sign the consent area of this form.

I,	, give peri	nission to the	Club
to enter required perso outlined in Swim Ont consent at any time up personal information	onal information on the Sw ario's policy, which I have oon written notice to the Sw will be purged from the da will be informed immedia	vim Canada database for read. I understand that I wim Ontario Executive D tabase. Withdrawal const	the purposes may withdraw Director, and my titutes de-
Consent is given for	myself under-aged child(re	en) – member(s) of the a	bove club.
NAME(please		y Time telephone (	_)
e-mail Address			
SIGNATURE			
DATE			

This form is to be kept on file by the above club until such time when consent is withdrawn or the person/family ceases to be a member of Swim Ontario. When transferring to another club in Ontario, a new consent form must be completed and filed with the accepting club. "Unattached" persons are to send this form directly to the Swim Ontario office.