



# Toronto Royals Minor Hockey Club

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## ***PRIVACY POLICY***

The Privacy Policy of the Toronto Royals Minor Hockey Club (the "Club") has been developed and implemented in order to define the manner in which the Club collects, uses, retains, secures, discloses and disposes of personal information related to its Club Officials, Club Personnel, Team Officials, Players, Parents/Guardians, Volunteers and other such similar persons involved in Club programs, business and activities.

The Club's Privacy Policy describes the way in which the Club shall, subject to applicable legal requirements, adhere to all relevant federal and provincial legislative requirements. The aforementioned policy follows the ten (10) "Fair Information Principles" associated with the federal Personal Information Protection and Electronics Documents Act (the "PIPEDA"):

### 1. Be Accountable

- Comply with all ten (10) of the fair information principles.
- Appoint an individual (or individuals) to be responsible for your organization's compliance.
- Protect all personal information held by your organization or transferred to a third party for processing.
- Develop and implement personal information policies and practices.

### 2. Identify the Purpose

Your organization must identify the reasons for collecting personal information before or at the time of collection:

- Before or when any personal information is collected, identify why it is needed and how it will be used.
- Document why the information is collected.
- Inform the individual from whom the information is collected why it is needed.
- Identify any new purpose for the information and obtain the individual's consent before using it.

### 3. Obtain Consent

- Inform the individual in a meaningful way of the purposes for the collection, use or disclosure of personal data.
- Obtain the individual's consent before or at the time of collection, as well as when a new use is identified.

### 4. Limit Collection

- Do not collect personal information indiscriminately.
- Do not deceive or mislead individuals about the reasons for collecting personal information.

### 5. Limit Use, Disclosure and Retention

- Use or disclose personal information only for the purpose for which it was collected, unless the individual consents, or the use or disclosure is authorized by PIPEDA.
- Keep personal information only as long as necessary to satisfy the purposes.
- Put guidelines and procedures in place for retaining and destroying personal information.
- Keep personal information used to make a decision about a person for a reasonable time period. This should allow the person to obtain the information after the decision and pursue redress.
- Destroy, erase or render anonymous information that is no longer required for an identified purpose or a legal requirement.

### 6. Be Accurate

- Minimize the possibility of using incorrect information when making a decision about the individual or when disclosing information to third parties.



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## 7. Use Appropriate Safeguards

- Protect personal information against loss or theft.
- Safeguard the information from unauthorized access, disclosure, copying, use or modification.
- Protect personal information regardless of the format in which it is held.

## 8. Be Open

- Inform customers, clients and employees that you have policies and practices for the management of personal information.
- Make these policies and practices understandable and easily available.

## 9. Give Individuals Access

- When requested, inform individuals if you have any personal information about them.
- Explain how it is or has been used and provide a list of any organizations to which it has been disclosed.
- Give individuals access to their information.
- Correct or amend any personal information if its accuracy and completeness is challenged and found to be deficient.
- Provide a copy of the information requested, or reasons for not providing access, subject to exceptions set out in Section 9 of PIPEDA.
- An organization should note any disagreement on the file and advise third parties where appropriate.

## 10. Provide Recourse

- Develop simple and easily accessible complaint procedures.
- Inform complainants of their avenues of recourse. These include your organization's own complaint procedures, those of industry associations, regulatory bodies and the Office of the Privacy Commissioner of Canada.
- Investigate all complaints received.
- Take appropriate measures to correct information handling practices and policies.