



CATEGORY: 1.0 GOVERNANCE & STRATEGIC DIRECTION POLICIES

SECTION: 1.9 General Policies

**POLICY: 1.9.7 Personal Information
Management Policy**

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Introduction

The Canadian Paralympic Committee (CPC) recognizes that an individual's right to privacy is an important issue. CPC understands an individual's interest in protecting personal information. As a result, the CPC is committed to managing personal information effectively.

Application

This policy protects all individual personal information collected, used or disclosed by the CPC. An individual is a person who uses, participates in or applies to use CPC programs, products or services.

Personal information may include but is not limited to:

- Address, age, date of birth, gender, telephone number, facsimile number, email address, website address, passport details;
- Next of kin;
- Disability details, medical history, classification details, medication;
- Frequent flyer information and special needs when travelling;
- Payment banking information; and
- Historical CPC Policy decisions (e.g., Appeals, Discipline, Doping, etc)

This personal information may be collected when a person:

- subscribes to or is involved with CPC programs, products, e-communications products or services.
- makes inquiries by telephone, signs a contract, registers or provides information by email or through the Internet or registers online; and/or
- visits the CPC web site

This policy excludes personal information that is aggregated in such a manner that it cannot be connected to a person and/or information, which is publicly listed in a written or online directory or typically made available through directory assistance as permitted by law.

Accountability

CPC is responsible for personal information under its control. In response, it has designated its Director General as accountable for the association's compliance with the provisions of this policy. Other individuals within CPC may be delegated to act on behalf of the Director General.

Identifying Purposes for Collection of Personal Information

CPC shall identify the purposes for which personal information is collected at or before the time the information is collected. CPC collects personal information only for the following purposes:



- To establish and maintain responsible relations with individuals and to provide ongoing service;
- To understand individual needs;
- For the development, enhancement, and delivery of CPC programs, products and services;
- To manage and develop CPC's business and operations, including personnel and employment matters; and
- To meet legal and regulatory requirements

Unless required by law, CPC shall not use or disclose for any new purpose, personal information that has been collected without first identifying and documenting the new purpose and obtaining the consent of the individual.

Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of an individual is required for the collection, use, or disclosure of personal information, except under circumstances in which the CPC is obligated to comply with legal requirements. The individual's consent for the collection, use or disclosure of personal information shall be valid for the duration of the individual's active record or until the individual rescinds their consent.

Accuracy of Personal Information

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used. CPC shall update personal information about individuals as and when necessary to fulfill the identified purposes or upon notification by the individual.

Security Safeguards

CPC shall protect personal information by security safeguards appropriate to the sensitivity of the information. CPC shall:

Endeavour to protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate storage security measures. CPC shall protect the information regardless of the format in which it is held.

Protect personal information it discloses to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

As a condition of employment or engagement in activities with the CPC, require all persons with access to personal information to contractually respect the confidentiality of personal information as outlined in this policy.

Individual Access to their Personal Information

CPC shall inform an individual of the existence, use, and disclosure of his or her personal information upon request and shall give the individual access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

In certain situations, CPC may not be able to provide access to all of the personal information it holds about an individual. Exceptions may include information that is prohibitively costly to provide, information that contains references to other individuals, information that cannot be disclosed for legal, security or commercial proprietary reasons, information that is subject to solicitor-client or



litigation privilege, or, in certain circumstances, information of a medical nature. CPC shall provide the reasons for denying access upon request.

Purging of Personal Information

CPC shall keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Personal information that is no longer necessary or relevant for the identified purposes or required to be retained by law shall be destroyed, erased or made anonymous.

Personal information records, which are inactive for a period of four (4) consecutive years, but may still be necessary, shall be electronically duplicated. After electronic duplication the paper originals and copies will be shredded.

Challenging Compliance

An individual shall be able to challenge CPC's compliance with this policy to the Director General.

The Director General may seek external advice where appropriate before providing a final response to individual complaints.

A complaint may only be investigated if there is sufficient evidence to prove that procedures, as laid out in this policy, were not followed. If a complaint is justified, CPC shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures.

Complaints Procedure

A complaint against this policy or elements thereof should proceed as set out below.

Step 1: Submit a formal written complaint to the CPC including the following information:

- Full Name
- Mailing Address
- Details of complaints
- Date of occurrence
- Names of those involved
- Desired resolution

Step 2: The CPC within five (5) business days of will acknowledge receipt of the submission

Step 3: The complaint will be screened to ensure there is sufficient information in the submission to proceed.

Step 4: CPC will contact the individual(s) involved within ten (10) business days from the date of receipt of the complaint to inform you of whether or not the complaint has sufficient information to proceed. If there is sufficient information to proceed, the CPC will conduct an investigation into your complaint. During this process, you may receive additional communications from the CPC. If your complaint has insufficient information to proceed, the CPC will take no further action on the complaint. If you do not agree with this decision, it may be appealed in accordance with the CPC's *Appeals Policy*.

Step 5: Within fifteen (15) business days from the date you were first contacted by the CPC, the Director General will contact you with a resolution to your concern. If you agree with the



resolution, then you and the Director General will work together to close the matter. If you do not agree with the resolution, then you will have the right to appeal the decisions in accordance with the CPC's *Appeals Policy*.