



PRIVACY POLICY

1. Preamble

There are instances when, in the course of work and operations of the British Columbia Fencing Association (referred to as the BCFA hereafter), individuals including BCFA members, volunteers, employees, partners, and the public, entrust BCFA with *Personal Information* (see Definitions below).

BCFA is committed to managing any private and personal information collection, use, storage, and disclosure responsibly and in compliance with any relevant provincial and federal legislation such as the Personal Information Protection Act (PIPA) and the Personal Information Protection and Electronic Documents Act (PIPEDA).

2. Purpose

The objective of this policy is to establish clear guidelines for BCFA *Participants* (see Definitions below) with regard to the handling of personal information and addressing privacy concerns, inquiries, and complaints.

3. Scope and Applicability

This policy supersedes any previous privacy policies of the BCFA effective the date of approval of the policy by the Board of Directors and may be considered part of the BCFA foundational policy framework. It is therefore subject to change as directed by the BCFA Board of Directors to ensure that it is relevant and remains current participants and regulations, and in order to protect the interests of the BCFA and BCFA Participants.

This policy applies to all the BCFA participants as defined below.

4. Definitions

The following definitions are presented in the context of the BCFA Privacy Policy:

4.1 "*Personal information*" is a broadly defined term that includes information that is reasonably capable of identifying a particular individual either alone or when combined with information from other available sources.

- a. Some examples of personal information are: name, address, gender, education, income, financial information, medical and genetic information, date of birth, drivers' license number, photographs or images of an individual, employment history, and product preferences.
- b. *Personal information* does not include business contact information or work product information.



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- c. *Business contact information* is information used to contact an individual at their place of business for a purpose related to that business.
- d. *Work Product information* is, for example, information prepared or collected by an employee as part of that individual's work responsibilities.

4.2 "*BCFA Participants*", without limiting the reach of the policy, are defined as:

- a. All individual athletes, or those eligible for nomination to, or forming part of, any team participating in sports competitions over which the BCFA has jurisdiction;
- b. All persons working with those teams or athletes, including coaches, medical and paramedical personnel, and other support persons;
- c. BCFA employees and persons under contract with the BCFA;
- d. All fencing coaches certified and/or recognized by the BCFA;
- e. All fencing officials and referees certified and/or recognized by the BCFA;
- f. All BCFA license-holders (and their parents, grandparents and/or guardians if minor); and
- g. Members of the BCFA Board of Directors, officers of the BCFA, staff members of the BCFA, committee members and volunteers working for or serving with or on behalf of or appointed by the BCFA.

4.3 "*Privacy Officer*" is responsible for BCFA compliance with any relevant legislation, and is an individual designated by the BCFA Board to act on behalf of the Board and BCFA on all relevant matters related to the protection of personal information and privacy.

4.4 *Implied consent* happens when an individual doesn't expressly give consent, but volunteers information for an obvious purpose and a reasonable person would consider it appropriate in the circumstances.

4.5 *Opt-out consent* is consent by not declining consent. For example, a form notifying an individual of the organization's intended use of the personal information with a "check-off" box. Individuals can check the box if they do not want the business using their information for this purpose.

4.6 *Express consent* occurs when an individual, knowing what personal information is being collected and for what purposes, willingly agrees to his or her personal information being collected, used and disclosed as notified. Express consent can be given in writing or verbally.

5. Exceptions

If the policies and procedures outlined in this document do not address a specific situation,



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individuals and/or organizations within the fencing community to whom this policy applies are expected to contact the designated Privacy Officer for guidance and clarifications.

6. Privacy Principles

The Privacy Policy of the BCFA is designed to comply with the applicable federal and provincial/territorial privacy legislation of Canada, and incorporates the following ten principles:

- 6.1 Accountability
- 6.2 Identifying Purpose
- 6.3 Consent
- 6.4 Limiting Collection
- 6.5 Limiting Use, Disclosure and Retention
- 6.6 Accuracy of Personal Information
- 6.7 Safeguarding Personal Information
- 6.8 Openness
- 6.9 Access to Personal Information
- 6.10 Challenging Compliance

If the Privacy Policy is changed at some point in the future, those changes will be included in updates to this Privacy Policy, wherever it is made available, in order to ensure that it is known and understood what information is collected, how it is used, and how it is protected. When personal information that has been collected is to be used for a purpose not previously identified, the new purpose will be identified prior the implementation of any new use policy or procedure.

6.1 Accountability

The BCFA is responsible for maintaining and protecting the personal information under its control. Accountability for this function within the BCFA is held by the Privacy Officer.

6.2 Identifying Purpose

BCFA, its agents, and participants to collect, use, and disclose personal information only for purposes that a reasonable person would consider appropriate in the circumstances, necessary to fulfill the purpose of the collection.

Generally, the BCFA collects personal information for the following purposes, although there be other circumstances that require such information to be collected and used:

- a. To manage and develop the BCFA's business and operations, including personnel and employment matters; and



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- b. To meet legal and regulatory requirements.

Examples of the personal information that may be handled during the course of regular association activities:

- a. Name;
- b. General contact information;
- c. Sex/gender;
- d. Registration numbers and categories (provincial, international);
- e. Category of engagement with the BCFA;
- f. Conflict of interest (actual or perceived);
- g. Results;
- h. Disciplinary actions and sanctions; and
- i. Transaction activity with the BCFA, including those related to registration or financial obligations.

Any information collected and retained by the BCFA is used primarily to determine an individual's entitlement to BCFA services. In addition, this information may be used to:

- a. Enable individuals to take advantage of any BCFA services;
- b. Inform individuals about BCFA products and services which may differ from what is currently accessed;
- c. Enable BCFA staff and others to better understand an individual's requirements to receive specific BCFA services; and
- d. Enable the BCFA to develop, enhance or improve services to members.

6.3 Consent

An individual's knowledge and consent are required before the BCFA is allowed to collect, use or disclose his or her personal information, except where inappropriate. Where possible, the BCFA will obtain an express consent in writing or verbally directly from the individual concerned at the time of collection. After having provided consent, an individual has the right to withdraw that consent at any time by providing reasonable notice to the BCFA's Privacy Officer.

Implied consent happens when an individual doesn't expressly give consent, but volunteers information for an obvious purpose and a reasonable person would consider it appropriate in the circumstances.

Individuals consent to the collection and use of their personal information for the purposes identified in this Privacy Policy by participating in BCFA-sanctioned events, registration services, accessing any BCFA online information services, using other BCFA member services, or otherwise indicating approval.

If an individual wishes to withdraw consent, or to opt out of the uses or disclosures of information previously collected for the purposes identified in this Privacy Policy, that individual may do so at any time by contacting the Privacy Officer in writing and allowing a reasonable time to review and act on this request. If such a



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request requires the deletion of registration information, the BCFA may no longer be able to provide that individual with any services.

In limited circumstances, the BCFA may use or disclose personal information without the knowledge or consent of the individual, for example, where you are legally authorized or required by law to do so without consent. For example, personal information can be disclosed for purposes of debt collection, breaches of agreements, as required by governmental bodies acting with authority, or as authorized or required by applicable legislation.

6.4 Limiting Collection

The BCFA collects only the minimum amount of personal information required to achieve the purpose for the collection as outlined in the Policy.

6.5 Limiting Use, Disclosure and Retention

The BCFA does not use personal information for purposes other than those for which it was collected, except with an individual's consent or as required by law. Once personal information is no longer required to fulfill the identified purposes or other legal requirements, it will be destroyed, deleted or made anonymous.

The BCFA sometimes uses the services of external firms to assist in communicating with individuals (e.g., surveys and mail distribution) or as a means of providing more effective and efficient services to these individuals (e.g., technology support), and for auditing purposes, but only to the extent required for the provision of services to members of the BCFA community. The external suppliers are contractually obligated to keep the information confidential, to use the information only for the purpose requested, and to destroy the information when it is no longer required.

The BCFA does not sell personal information to any third-party organization. In certain circumstances, however, basic contact information may be shared amongst members, to facilitate ongoing communication.

6.6 Accuracy of Personal Information

Personal information is kept as accurate, complete and up-to-date as necessary for the purposes for which it is to be used. Individuals are encouraged to provide updates to their personal information as changes occur, to enable the continuity of service provision.

6.7 Safeguarding Personal Information

BCFA will keep personal information used to make a decision that directly affects individuals for at least one year after you make that decision; after that period of time has passed, BCFA will securely destroy or anonymize personal information once it is no longer necessary to fulfil the identified purposes or any other legal or business purposes.



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Personal information, whatever its form, will be protected by security safeguards appropriate to the sensitivity of the information. The safeguards will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.

The measures of protection include:

- a. Physical measures, for example, locking filing cabinets and restricted access to offices;
- b. Organizational measures, for example, the issuance and control of security or identity passes, and limiting access to personal information on a “need-to-know” basis;
- c. Technological measures, for example, the use of passwords and encryption; and
- d. Procedural measures, for example, the shredding of sensitive personal information.

6.8 Openness

The BCFA is committed to being open about its policies and practices with respect to the handling of personal information. The Privacy Policy is available on the BCFA website, and additional information may requested directly from the Chief Privacy Officer.

6.9 Access to Personal Information

Individuals may request a copy of their personal information held by the BCFA by submitting a written request to the Privacy Officer. Acceptable proof of identification is required before such information is given out. If an individual who has requested his/her own personal information, and considers that the information held by the BCFA is inaccurate, the individual may contact the Privacy Officer requesting that the information be reviewed and, if inaccurate, changed.

BCFA may charge a “minimal” fee for providing an individual with access to their personal information. If a fee is required, BCFA will give the individual a written fee estimate in advance; BCFA may require payment of a deposit or the whole fee before releasing the requested information.

BCFA will provide the requested personal information within 30 business days after it is requested unless a time extension is granted under relevant legislation.

6.10 Challenging Compliance

An individual can challenge compliance with the above policy by providing written details of the challenge to the Privacy Officer.



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Contact of the designated Privacy Officer:

Yuriy Rubin at bcfa@bcfencingassociation.com

Review and Approval

This policy is to be approved by the Board of Directors of the BCFA and shall be reviewed on a regular basis, as and when required.

Recommended for Approval:

Yuriy Rubin

President, BC Fencing Association

December 21, 2023

Date

Approved by the Board of Directors

December 22, 2023

Date