

PRIVACY POLICY

EFFECTIVE: 21-07-26

REVISED:

The Shooting Federation of Canada (SFC) is committed to creating and maintaining the highest standards of good governance and a transparent process in policy development. This Privacy Policy complies with the provisions of Canada's *Personal Information Protection and Electronic Documents Act* ([PIPEDA](#)), in support of our ongoing efforts to operate within generally accepted norms for handling personal information. The SFC is committed to creating and maintaining the highest standards of good governance and a transparent process in policy development.

SFC Social Media

Individuals posting on SFC social media platforms agree to share any public information attached to their social media accounts with the SFC community and with the public at large. The SFC retains the right to remove inappropriate posts on its social media.

SFC Website

By accessing the SFC website, certain information about the User, such as Internet protocol (IP) addresses, navigation through the Site, the software used and the time spent, along with other similar information, will be stored on the SFC server. These will not specifically identify the User. The information will be used internally only for website traffic analysis. If the User provides unique identifying information, such as name, address and other information on forms stored on the website, such information will be used by the SFC internally and will not be published for general access.

The SFC may provide certain representatives with login access to the website view collected personal information as it appears on SFC membership documents. SFC representatives will only be permitted to access this information when accessing it is necessary for them to complete their volunteer or employment responsibilities. Individuals who have submitted information be able to login to the website and review the accuracy and completeness of information and update their own profile as needed.

Personal Information

- consent for the use of personal information by the SFC is a **voluntary agreement** for the collection, use and sharing of personal information for a stated purpose on the website, social media or on a form;
- **express consent** is unequivocal and does not require an inference on the part of the SFC;
- **implied consent** is reasonable and inferred from the action or inaction of the individual (e.g. implied consent for using the return address on a donation, for sending a receipt for income tax purposes, for the mailing of awards);

- all personal information collected, including that of customers, donors, sponsors, volunteers, and employees of the SFC is kept in the strictest confidence;
- the information will only be used by the SFC for the purposes for which it was collected, as disclosed to the individual or entity at the time of collection;
- the SFC is responsible for personal information that has been provided to a volunteer for solicitation or governance purposes;
- the SFC will use contractual or other means to provide a comparable level of protection while the information is in the possession of the volunteer;
- the term 'Legal Guardians' will mean that consent will not be obtained from individuals who are minors, seriously ill, or mentally incapacitated and therefore will be obtained from a parent, legal guardian or person having power of attorney;
- the SFC protects personal information with security safeguards appropriate to the sensitivity of the information;
- the security safeguards protects personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification;
- The SFC protects personal information regardless of the format in which it is held, depending on the sensitivity of the information that has been collected, the amount, distribution, and format of the information, and the method of storage.

SFC Privacy Officer

The Shooting Federation of Canada publicly discloses the methods by which we handle personal information. This information is readily available through our Privacy Policy, on our website or upon request by contacting the SFC Privacy Officer - Sue Verdier at sverdier@sfc-ftc.ca. Accountability for the SFC's compliance with this Policy rests with the designated Privacy Officer, even though other individuals within the organization may be responsible for the day-to-day collection and processing of personal information. In addition, other individuals within the organization may be delegated to act on behalf of the Privacy Officer. This does not in any way mitigate the Privacy Officer's responsibility for privacy issues. The Privacy Officer is also responsible for: responding to access requests in accordance with this Policy; establishing procedures to receive and respond to complaints and inquiries; ensuring any third party providers abide by this policy; and the training and communication to staff regarding the SFC policy. The Privacy Officer reports to the President and the ultimate responsibility for privacy issues rests with the SFC Board of Directors.

Personal Information

Personal information may include:

- Financial information
- Birth dates

- Other identifying data not publicly available including that collected for high performance program athletes, email addresses, street addresses, medical information and emergency addresses.
- Names of legal parents/guardians and information about a junior member's address, telephone number and email address

Personal information may **not** include:

- The name, title, business address, or phone number of an employee of the SFC
- Results or classification
- Business contact information of an employee of the SFC, such as title or position

Collection of Personal Information governance:

- the collection, use and disclosure of personal information in a manner that recognizes the right of privacy of individuals with respect to their personal information and the need of organizations to collect, use or disclose personal information for purposes that a reasonable person would consider appropriate in the circumstances, including use and disclosure in the course of commercial activities;

Specific examples (not limiting) include the use of personal information:

- can be collected verbally or in writing;
- produced by the individual in the course of their employment, business or profession and the use is consistent with the purposes for which the information was produced;
- for statistical, or scholarly study or research, purposes that cannot be achieved without using the information, the information is used in a manner that will ensure its confidentiality;
- for tracking the development of shooters
- substantiation that athletes train and compete in an age appropriate environment
- entries to events
- the administration of donations, sales, grants, cheques, high performance agreements, classification, and reporting, entries and related arrangements to international and national events, official coach and athlete certification
- the provision of insurance for members
- the extraction of data, to report summary demographics to our funders
- the facilitation of emergency contact information as well as to ensure compliance with SFC residency regulations;
- facilitating membership communication related to upcoming events and programs;

- confirmation providing the assistance provided to members and/or consumers in the event that they forget their login information;
- permission of a third party billing company (Wild Apricot) to send confirmation and receipt of payment to the customer via email;
- reporting and publishing athletes' names, genders, ages, club affiliations on SFC web pages or in results, news releases and ranking reports;
- access to information for medical emergencies;
- the management of payroll, health benefits, insurance claims or insurance investigations.

Disclosure of Information

The SFC may disclose personal information with the knowledge or consent of the individual only if the disclosure is:

- made to, in the Province of Quebec, an advocate or notary or, in any other province, a barrister or solicitor who is representing the organization;
- for the purpose of collecting a debt owed by the individual to the organization;
- the collection of an individual's email address, if the address is collected by the use of a computer program that is designed or marketed primarily for use in generating or searching for, and collecting, email addresses;
- the personal information is necessary for carrying on the business or activity that was the object of the transaction

The SFC will not disclose personal information if doing so would likely reveal personal information about a third party. When personal information that has been collected is to be used for a purpose not previously identified, the new purpose shall be identified prior to use. Unless the new purpose is required by law, the consent of the individual is required before information can be used for that purpose. Those collecting personal information on behalf of the SFC will be able to explain the purposes for which the information is being collected.

Security Breach

Unless otherwise prohibited by law, the SFC shall notify an individual of any breach of security safeguards involving personal information, if it is reasonable in the circumstances to believe that the breach creates a real risk of significant harm to an individual. The notification shall contain sufficient information to allow the individual to understand the significance to them of the breach and to take steps, if any are possible, to reduce the risk of harm that could result from it or to mitigate that harm. It shall also contain any other prescribed information. The notification shall be given as soon as feasible after the organization determines that the breach has occurred. The SFC will also notify any other organization, a government institution, or a part of a government institution of the breach if the notifying organization believes that the other

organization or the government institution or part concerned may be able to reduce the risk of harm that could result from it or mitigate that harm, or if any of the prescribed conditions are satisfied.

The factors that are relevant to determining whether a breach of security safeguards creates a real risk of significant harm to the individual include:

- the sensitivity of the personal information involved in the breach;
- the probability that the personal information has been, is being or will be misused; and
- any other prescribed factor.

If at any time an individual wishes to withdraw consent to the use of personal information for any purposes, the individual may do so by contacting the Privacy Officer for the SFC. It is always the individual's choice to provide information in certain fields and/or to withdraw consent to the use of personal information. Failure to complete certain sections may inhibit the individual's ability to fully access all areas of the web site.

APPENDIX A

SFC FORM ADDITIONS

Standard Statement Addition for all SFC Forms

The SFC Privacy Statement complies with the provisions of Canada's Personal Information Protection & Electronic Documents Act (PIDPED). Information collected on this form is to provide data for the planning of the event and the implementation of funding requirements by Sport Canada. By completing this form, you give consent to the collection and the specified uses of the information. The Privacy Policy is available on the SFC website.