



Approved By: Board of Directors

Effective Date: June, 2007

Reviewed: March, 2017

Alberta Alpine Ski Association

Policy Title

2.10 Privacy

Policy Objective

Due to the fact that all transactions that Alberta Alpine undertakes are not commercial in nature the Provincial Personal Information and Protection Act does not apply. Alberta Alpine though wishes to adhere to a high standard and has developed its own privacy policy based on the Privacy Commissions 10 Principles.

Procedure

Alberta Alpine Ski Association values the privacy of both its partners (members, corporate partners and granting partners) and employee's personal information.

- Personal information is defined as name, age, weight, height, medical records, income, purchases and spending habits, race, ethnic origin and color, blood type, DNA code, fingerprints, education, and home address and phone number.
- Personal information does not include name, job title, or business address and office number.
- The Privacy Officer is the President. If you have any questions or concerns please address them directly to the Privacy Officer.
- As of January 1, 2004 AASA's approach to the personal information of partners will be governed by the Privacy Commission's 10 Principles. Any personal information collected prior to January 1, 2004 will be grandfathered and not require a customer or employee's additional consent.

Principle 1 - Alberta Alpine Accountability

- AASA is responsible for all personal information under our control, including personal information disclosed to third parties for processing.
- The Privacy Officer is responsible for AASA's compliance with this Policy.

Principle 2 - Identifying the Purposes for Personal Information Collection

- AASA shall identify the purposes for which personal information is collected.
- AASA collects personal information only for the following purposes:
 - to manage and develop AASA's membership and business operations, including personnel matters;
 - to meet legal and regulatory requirements.
- Personal information will not be used for any other purpose without consent.
- When AASA proposes to use personal information for a purpose not previously identified the new purpose shall be identified and documented prior to the new use, in the manner.

Principle 3 - Obtaining Consent

- AASA shall obtain consent from their partners before or when they collect, use, or disclose personal information, except where inappropriate.
- Consent is required for the collection of personal information and the subsequent use or disclosure of this information.



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- AASA may collect, use, or disclose personal information without a partner's knowledge or consent in instances where legal or security reasons, or the welfare of an individual, might make it impossible or impractical to seek consent.
- Consent can be either expressed or implied.
- Partners may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting the Privacy Officer.
- In general, the use of products and services by a partner, or the acceptance of employment or benefits by an employee, constitutes implied consent for AASA to collect, use and disclose personal information for all identified purposes.

Principle 4 - Limiting the Collection of Personal Information

- The collection of personal information by AASA shall be limited to that which is necessary for the purposes identified by AASA. Information shall be collected by fair and lawful means.
- AASA shall collect only the amount and type of personal information needed for specified purposes that have been documented by AASA and identified to partners.
- AASA shall not mislead or deceive partners about the purposes for which personal information is being collected.

Principle 5 - Limiting Use, Disclosure, and Retention of Personal Information

- Personal information shall not be used or disclosed by AASA for purposes other than those for which it was collected, except with the consent of the partner or employee, or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.
- AASA shall destroy, erase, or make anonymous personal information that is no longer required to fulfill the identified purposes.
- AASA may disclose a partner's personal information to:
 - a person who in the reasonable judgment of AASA is seeking the information as an agent of the partner;
 - any club to which a member is transferring from another club, when that member is not in good standing with their last club
 - another company or individual for the development, enhancement, marketing or provision of any of AASA's products or services;
 - an agent used by AASA to evaluate the customer's creditworthiness or to collect the customer's account;
 - a credit reporting agency;
 - a public authority or agent of a public authority, if in the reasonable judgment of AASA, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information; and a third party or parties, where the partner consents to such disclosure or disclosure is required by law.
- AASA may disclose personal information about its employees:
 - for normal personnel and benefits administration;
 - in the context of providing references regarding current or former partners in response to requests from prospective employers; or
 - where disclosure is required by law.

Principle 6 - Accuracy of Personal Information

- AASA shall keep personal information as accurate, complete, and up-to-date as necessary for the purposes for which it is to be used.



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- Information shall be sufficiently accurate, complete, and up-to-date so as to minimize the possibility that inappropriate information may be used to make a decision about the partner or employee.
- AASA shall not routinely update personal information where such updated information is not needed to fulfill the purposes for which it was collected.

Principle 7 - Safeguarding Personal Information

- AASA shall protect personal information with security safeguards appropriate to the sensitivity of the information.
- The security safeguards shall protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification, regardless of the format in which the information is held.
- The nature of the safeguards will vary depending on the sensitivity of the information that has been collected, the extent of the information, and the method of storage. More sensitive information will be safeguarded by a higher level of protection.
- The methods of protection include:
 - physical measures, for example, locked filing cabinets and restricted access to offices;
 - organizational measures, for example, security clearances and limiting access on a “need to know” basis;
 - technological measures, for example, the use of passwords and encryption;
 - AASA shall make their employees aware of the importance of maintaining the confidentiality of personal information.
 - AASA shall dispose of personal information in a manner that prevents unauthorized parties from gaining access to the information.

Principle 8 - Openness about Policies and Procedures

- AASA shall make readily available to partners specific information about their policies and procedures relating to the management of personal information.
- The information made available by AASA shall include:
 - the name, title and address of the individual who is accountable for AASA’s policies and procedures and to whom complaints or inquiries can be forwarded.

Principle 9 - Providing Access to Personal Information

- Upon request, and unless prohibited by law, AASA shall inform partners of the existence, use, and disclosure of their personal information and provide access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.
- Upon request, AASA shall inform a partner or employee whether or not it holds personal information about them, and should indicate the source of this information.
- A partner or employee may be required to provide sufficient information to AASA to permit it to provide an account of the existence, use, and disclosure of personal information. The required information provided to AASA for this purpose shall only be used for this purpose.
- In certain situations, AASA may not be able to provide access to all the personal information it holds. Exceptions to the access requirement must be limited to those allowed or required under law.
- In providing an account of third parties to which it has disclosed personal information, AASA shall attempt to be as specific as possible.
- AASA shall respond to a partner or employee request within a reasonable time.



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- When a challenge is not resolved to the satisfaction of the partner or employee, AASA shall record the substance of the unresolved challenge in the personal information.

Principle 10 - Challenging Compliance

- An AASA partner or employee shall be able to address a challenge concerning compliance with the above principles to the designated individual accountable for AASA's compliance.
- AASA shall investigate all complaints. If a complaint is found to be justified, it shall take appropriate measures.
- AASA shall inform partners or employees who lodge complaints, or inquire about complaint procedures, that they can contact the Board of Directors if they are not satisfied with the response from AASA.

Scope

All employees and volunteers of Alberta Alpine

Related Policies

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