

## SMFSC Privacy & Confidentiality Policy

The Streetsville Meadowvale Figure Skating Club (SMFSC) is committed to protecting privacy through the responsible collection, use, and safeguarding of personal information.

This means:

- a. SMFSC will not sell, trade, lend, or share your personal information with any other organization.
- b. SMFSC will keep all personal information confidential and protect it with appropriate safeguards, whether stored in print, electronically, or in any other form.
- c. Upon request, SMFSC will provide you with access to your personal information on file and will update, correct, or delete it as requested, unless otherwise required by law.

### Personal Information and Purpose of Collection

The Personal Information Protection and Electronic Documents Act (PIPEDA) governs how personal information is collected, used, and protected. Personal information refers to data that identifies you as an individual. This does not include business-related information (for example, a person's business address and telephone number). SMFSC is committed to safeguarding your privacy and will collect personal information only as needed to maintain and support the highest standards in the organization, operation, and programming of our skating activities. SMFSC collects personal information from participants, coaches, officials, team managers, contractors, employees, and volunteers (collectively referred to as "Individuals") for purposes that include, but are not limited to, the following:

SMFSC collects personal information for the following purposes:

- a. To register individuals for programs, activities, and events, and to process the purchase of equipment or other products.
- b. To send communications related to SMFSC fundraising, programs, events, and activities.
- c. To determine eligibility, age group, and appropriate levels for participation or competition.
- d. To prepare award nominations, biographies, published articles and support media relations.
- e. To verify certification levels, coaching qualifications, and coach selection.
- f. To process payments for product purchases and event or program registrations.
- g. To collect names, ages, and signatures for participant agreements, medical permissions, and waivers.
- h. To manage SMFSC's payroll, contracts, bursaries, grants, and honorariums.
- i. To share contact information for communication between the board, committees, volunteers, and members.
- j. To maintain contact details for club, skating schools and sections (such as names, websites, phone numbers and email addresses) to support SMFSC operations and communication.
- k. To collect emergency contacts and medical information for safety, medical emergencies, or insurance purposes.
- l. To understand membership demographics and program needs.

## Consent

- a. SMFSC will obtain consent by lawful means when collecting personal information, and before using or sharing it. If consent was not obtained at the time the information was collected, it will be requested before any use or disclosure takes place.
- b. In certain cases, permitted by law, SMFSC may collect personal information without consent when it is reasonable to do so from the individual's perspective.
- c. By providing personal information to SMFSC, individuals consent to its use for the purposes outlined in this Privacy Policy, subject to applicable legal requirements.
- d. When determining how consent should be obtained, SMFSC will consider the sensitivity of the information being collected.
- e. SMFSC will not make consent to collect, use, or disclose personal information a condition of participation, except when the information is necessary to provide a specific program, service, or activity.
- f. Individuals may withdraw their consent to the collection, use, or disclosure of their personal information at any time, subject to legal or contractual restrictions. A minimum of one week's notice must be provided to SMFSC. The SMFSC Board of Directors will explain any implications that may result from withdrawing consent.

## Limited Collection, Use, Disclosure and Retention

- a. SMFSC collects personal information fairly, by lawful means, and only for the purposes outlined in this Privacy Policy. In keeping with Skate Canada's requirements, our *Notice of Collection* statement is provided in Appendix A.
- b. SMFSC will not use or share personal information for any purpose other than those for which it was originally collected unless the individual provides consent or disclosure is required by law.
- c. Personal information may be shared with authorized SMFSC volunteers (such as committee members, board members, event organizers, or officials), as well as partner organizations including Skate Ontario, Skate Canada, the Coaches Association of Ontario, including award committees and government ministries. This sharing only occurs when needed for programs, competitions, training, or related club activities.
- d. When personal information is shared with a third party with an individual's consent, that third party must agree to protect the information and limit its use and disclosure.
- e. The *Notice of Collection* statement will be communicated to all registrants at the time of registration (see Appendix A).

## Accuracy

SMFSC is committed to maintaining accurate and up-to-date personal information. We use the most current information available to ensure that decisions made about individuals are based on accurate and relevant information.

## Security

SMFSC protects personal information using appropriate physical and electronic safeguards. Electronic records are restricted by password-protected access, and physical records are stored securely and accessible only to authorized personnel.

## Website

When you visit the SMFSC website, limited non-personal data (such as IP address, pages visited, and time spent) may be collected to improve site performance. Cookies may be used to enhance user experience and may be disabled in browser settings, though this may limit functionality.

The website may contain links to external sites. SMFSC is not responsible for the content or privacy practices of those sites. All website content is provided for general informational purposes and may be updated without notice.

The laws of the Province of Ontario govern use of this website.

## Confidentiality (Information Protection)

The purpose of this policy is to ensure that confidential information is only shared with individuals who are authorized to receive it. This policy applies to all SMFSC employees, contractors, volunteers, directors, committee members, officials, trustees, and members.

Confidential information includes any non-public or proprietary details about SMFSC's operations (including information from the past, present, or future) that are not publicly accessible or part of the public record. This may include, but is not limited to:

- Organizational information such as contracts, marketing plans, operational methods, production processes, financial details, and technology (including hardware, software, and codes).
- Personnel information such as staff lists, resumes, evaluations, and internal structures.
- Any other information that SMFSC considers private or confidential.

Access to confidential information is provided only to those who need it to perform specific duties. Using this information for any other purposes (especially for personal gain) is strictly prohibited. Information may not be shared outside of SMFSC unless required by law or approved in writing by the SMFSC Board of Directors.

SMFSC takes the protection of confidential information seriously. Any loss, theft, or unauthorized disclosure must be reported immediately to the SMFSC Board of Directors and may result in disciplinary or legal action.

All reasonable measures must be taken to safeguard confidential information at all times.

## Internal Confidentiality Guidelines

- a. All matters discussed during any internal part of a meeting are confidential until they are shared at an open meeting.
- b. All matters under review by a committee are confidential unless the Chair, in consultation with the SMFSC President, determines they may be shared. These decisions will be guided by the purpose of this policy.
- c. Confidential information remains the property of SMFSC. All documents or materials containing confidential information must be returned to SMFSC when an individual's involvement with the organization ends.

This Confidentiality Policy works in conjunction with SMFSC's Privacy Policy to ensure information is handled in accordance with applicable Canadian law.

## Access to Information

Upon written request and with assistance from SMFSC, an individual may be informed of the existence, use, and disclosure of their personal information and will be provided access to such information. The requested information will be disclosed to the individual at a nominal cost related to photocopying, within thirty days of receiving the written request to:

SMFSC  
6975 Meadowvale Town Centre Circle  
Unit 9, Suite 324  
Mississauga, ON L5N 2V7

## Appendix A – Skate Canada Notice of Collection

Your privacy and the protection of your personal information are important to us. Your personal information is required to register you with Skate Canada in any capacity, including, without limitation, as a Skate Canada registrant, coach or in connection with your affiliation with a skating club or skating school and to administer various services, such as Skate Canada events. Your personal information may also be exchanged with Skate Canada affiliates which includes your local skating club or skating school or provincial association or section. By registering with a program at SMFSC, you expressly provide your consent to the sharing of your personal information with Skate Canada and as described herein for purposes of registration and receipt of national services delivered by Skate Canada. We adopt the 10 Fair Information Principles into our privacy program, and employ reasonable measures to protect against unauthorized access, processing, disclosure, alteration, destruction, or loss of your personal information. See Skate Canada's Privacy Policy for more details. For further information or comments regarding our protection of your privacy, please contact Skate Canada at [safesport@skatecanada.ca](mailto:safesport@skatecanada.ca).

This policy will be reviewed periodically by the Board of Directors.  
Last Updated / Effective Date: April 2026