

Effective date	August 2020
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Date last reviewed	July 2025
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Replaces and/or amends	Personal Information Protection Policy, Effective September 2023
Approved by and date	FBC Board of Directors, August 6, 2025
Appendix(-ces) to this Policy	-

PURPOSE

The British Columbia Freestyle Ski Association, hereafter referred to as Freestyle BC, is committed to providing exceptional service to all Individuals.¹ As providing this service involves the collection, use and disclosure of some Personal Information, protecting such Personal Information is one of our highest priorities.

This Policy is designed to comply with relevant privacy legislation, including the *Personal Information Protection Act* (“PIPA”) and, where applicable, the Personal Information Protection and Electronic Documents Act (“PIPEDA”).

We will inform all directors, officers, committee members, employees and volunteers of Freestyle BC why and how we collect, use and disclose their Personal Information, obtain consent where required, and only handle their Personal Information reasonably and appropriately.

In compliance with applicable legislation, this Policy outlines the principles and practices we will follow in protecting Individuals’ Personal Information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of Personal information and allowing Individuals to request access to and correct their Personal Information.

DEFINITIONS

1. These terms will have these meanings in this Policy:
 - 1.1. **“Personal Information”** – means information about an identifiable individual. For example, Personal Information includes, but is not limited to, name, age, home address and phone number, FIS registration number, medical information, email address, and mobile phone number. Personal Information does not include contact information or work product information.²
 - 1.2. **“Privacy Officer”** – means Freestyle BC’s Executive Director, or his or her delegate, who is responsible for ensuring that Freestyle BC complies with this policy and applicable legislation.

SCOPE

2. This Policy applies to Freestyle BC and its sanctioned Clubs. This Policy also applies to any service providers collecting, using, or disclosing Personal Information on behalf of Freestyle BC.

COLLECTING PERSONAL INFORMATION

3. Unless the purposes for collecting Personal Information are obvious and the Individual

¹ A separate document with term definitions that apply to all Freestyle BC policy is found online and in the Freestyle BC Safe Sport Policy Manual.

² Each as defined in the *Personal Information Protection Act*.

voluntarily provides Personal Information, we will communicate the purposes for which Personal Information is being collected, either orally or in writing, before or at the time of collection.

4. We will only collect Individuals' information to fulfill the following purposes:
 - 4.1. To verify identity;
 - 4.2. To identify Individual preferences;
 - 4.3. To deliver requested programs and services;
 - 4.4. To guarantee a travel or hotel reservation;
 - 4.5. To process a newsletter subscription;
 - 4.6. To enroll the Individual in a Freestyle BC program;
 - 4.7. To enroll the Individual with a third-party service provider;
 - 4.8. To send out Freestyle BC membership information;
 - 4.9. To contact Individuals for fundraising and alumni events;
 - 4.10. To ensure a high standard of service to Individuals,
 - 4.11. To meet legal and regulatory requirements;
 - 4.12. To assess suitability for participation in events or selection to Freestyle BC teams;
 - 4.13. To collect and process payments;
 - 4.14. To address such other circumstances as may require Personal Information to be collected and used.

CONSENT

5. We will obtain Individuals' consent to collect, use or disclose Personal Information (except where, as noted below, we are authorized to do so without consent).
6. Consent can be provided orally, in writing, electronically, through an authorized representative, or it can be implied where the purpose for collecting, using or disclosing the Personal Information would be considered obvious and the Individual voluntarily provides personal information for that purpose.
7. Consent may also be implied when an Individual is given notice and a reasonable opportunity to opt out of their Personal Information for mail-outs, marketing new services or products, or fundraising, and the Individual does not opt out.
8. Subject to certain exceptions (e.g., the Personal Information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), Individuals can withhold or withdraw their consent for Freestyle BC to use their Personal Information in certain ways. An Individual's decision to withhold or withdraw their consent to certain uses of Personal Information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the Individual in deciding.

9. We may collect, use or disclose Personal Information without the Individual's knowledge or consent in the following limited circumstances:
 - 9.1. When the collection is clearly in the interests of the Individual and consent cannot be obtained in a timely way,
 - 9.2. When the collection is necessary for the medical treatment of the Individual and the Individual is unable to give consent,
 - 9.3. If the collection is necessary to determine the Individual's suitability (i) to receive an honour, award or similar benefit, including an athletic award, scholarship or bursary, or (ii) to be selected for a team or program,
 - 9.4. When the organization may collect Personal Information from or on behalf of another organization without the consent of the Individual to whom the information relates;
 - 9.5. To assist that organization to carry out work on behalf of the other organization;
 - 9.6. When the collection, use or disclosure of Personal Information is permitted or required by law;
 - 9.7. In an emergency that threatens an Individual's life, health, or personal security,
 - 9.8. When the Personal Information is available from a public source (e.g., posted online);
 - 9.9. When we require legal advice from a lawyer;
 - 9.10. To collect a debt;
 - 9.11. To protect ourselves from fraud;
 - 9.12. To investigate an anticipated or suspected breach of an agreement or contravention of law;
 - 9.13. For the purpose of administering a Report regarding an alleged breach of Freestyle BC policy pursuant to the Freestyle BC *Discipline and Complaints Policy*.

USING AND DISCLOSING PERSONAL INFORMATION

10. We will only use or disclose the Individual's Personal Information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes, such as
 - 10.1. To conduct surveys to enhance the provision of our services;
 - 10.2. To contact Individuals directly about programs and services;
 - 10.3. To publicize select Personal Information at an event (e.g. age on personal bio at an event, displaying member age on posted scores/results, etc.)
 - 10.4. To facilitate programs using third-party service providers (e.g. transferring member benefits to IST support people, Canadian Sport Institute, Canada West Ski Areas Association, etc.).
 - 10.5. Where needed to enforce disciplinary sanctions.
11. We will not use or disclose an Individual's Personal Information for any additional purpose unless we obtain consent.
12. We will not sell member lists or Personal Information to other parties.

RETAINING PERSONAL INFORMATION

13. In the event that we use an Individual's Personal Information to decide a matter directly affecting the Individual, we will retain that Personal Information for at least one year (or such other period as may be required or permitted by law in the circumstances) so that the Individual can request access.
14. We will retain an Individual's Personal Information only as long as necessary to fulfill the identified purposes or a legal or business purpose.

ENSURING ACCURACY OF PERSONAL INFORMATION

15. We will make reasonable efforts to ensure that an Individual's Personal Information is accurate and complete where it may be used to make a decision concerning the Individual or disclosed to another organization.
16. Individuals may request correction to their Personal Information to ensure its accuracy and completeness. A request to correct Personal Information must be made in writing and provide sufficient detail to identify the Personal Information and the correction being sought.
17. A request to correct Personal Information should be forwarded to the Privacy Officer.
18. If it is determined that Personal Information held by Freestyle BC needs to be more accurate or complete, we will correct the information as required and, if needed, send the corrected information to any organization to which we disclosed the Personal Information in the previous year. We will note the Individual's correction request in the file if the correction is not made.

SECURING PERSONAL INFORMATION

19. We are committed to ensuring the security of Individuals' Personal Information to protect it from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.
20. The following security measures will be followed to ensure that Individuals' Personal Information is appropriately protected:
 - 20.1. the use of locked filing cabinets;
 - 20.2. physically securing offices where Personal Information is held;
 - 20.3. using user IDs, passwords, encryption, and firewalls;
 - 20.4. restricting employee, contractor, and volunteer access to Personal Information as appropriate (i.e., only those that need to know will have access; contractually requiring any service providers to provide comparable security measures).
21. We will use appropriate security measures when destroying Individuals' Personal Information, such as
 - 21.1. shredding documents,
 - 21.2. deleting electronically stored information.
22. We will continually review and update our security policies and controls as technology changes to ensure ongoing Personal Information security.

PROVIDING INDIVIDUALS ACCESS TO PERSONAL INFORMATION

23. Individuals have a right to access their Personal Information, subject to limited exceptions as set out in relevant statutes. For example, a list of the exceptions to access can be found in section 23 of PIPA.
24. A request to access Personal Information must be made in writing and provide sufficient detail to identify the information being sought (e.g. for RPA scores)
25. Upon request, we will also tell Individuals how we use their Personal Information and to whom it has been disclosed, if applicable.
26. We will make the requested information available within 30 business days or provide written notice of an extension where additional time is required.
27. A minimal fee may be charged for providing access to Personal Information. Where a fee may apply, we will inform the Individual of the cost and request further direction from the Individual on whether or not we should proceed with the request.
28. If a request is refused in whole or in part, we will notify the Individual in writing, providing the reasons for refusal and the recourse available to the Individual.

QUESTIONS AND COMPLAINTS: THE ROLE OF THE PRIVACY OFFICER

29. The Privacy Officer ensures Freestyle BC complies with this Policy and applicable legislation.
30. Individuals should direct any complaints, concerns or questions regarding Freestyle BC's compliance in writing to the Privacy Officer. If the Privacy Officer cannot resolve the concern, the Individual may also write to the Information and Privacy Commissioner of British Columbia.
31. Contact information for Freestyle BC's Privacy Officer: info@freestylebc.ski