



This policy aims to:

- respect an individual's right to privacy (including employees, volunteers and members)
- protect personal and confidential information
- mitigate risks such as identity theft, harassment, physical harm and damage to business or personal reputation
- ensure breach incidents are reported to affected parties and regulators
- provide for confidential safe reporting of breaches
- ensure complaints are handled in a fair and consistent manner
- identify and assess potential privacy risks, and
- ensure compliance with applicable privacy legislation.

## INFORMATION CLASSIFICATION

- Personal information includes a person's name along with one or more of the following:
  - birthdate
  - driver's license information
  - contact information (home or business)
  - financial information
  - personal health number
  - social insurance number
- Confidential information includes:
  - corporate credit card information
  - financial results (prior to release)
  - employee and payroll information
  - minutes and other corporate governance documents
  - system passwords
- Public information includes:
  - information publicly available through public databases, search engines etc.
  - publicized biographies or articles



## ACCOUNTABILITY

- The Privacy Officer is
  - responsible for personal information under the control of Fusion FC
  - accountable for compliance with applicable privacy legislation
- All Fusion FC employees and volunteers are responsible for protecting personal and confidential information

## CONFIDENTIALITY AGREEMENTS

- All Fusion FC Board members must sign these forms upon their appointment:
  - Confidentiality agreement
  - Conflict of Interest Disclosure
- All employees and contractors
  - must sign a confidentiality agreement
- All Fusion FC Committee members must sign a confidentiality agreement
- Guests at Fusion FC Board or Committee meetings must sign a confidentiality agreement
- Guests include non-voting members
- This does not apply to employees of organizations providing services under an agreement or engagement

## IDENTIFYING PURPOSE

- The purpose for which personal information is collected is identified
  - before the time of collection or
  - at the time of collection
- Consent is obtained from an informed individual who understands our purpose for collecting, using and disclosing their personal information
- Collection of personal information is:
  - done by fair and lawful means
  - limited to what is necessary for the purposes identified



- Personal information will not be used for an unrelated new purpose without obtaining consent

## OBTAINING CONSENT

- To use, disclose and retain their personal information, individuals provide
  - explicit consent by signing the appropriate form or performing an online transaction when applying for registration with Fusion FC and/or granting permission to correspond
  - implied consent by voluntarily providing information for
    - registration or attendance at programming, or
    - purposes that would be considered obvious to a reasonable person such as
    - by observation of a public sporting event at which the person appears voluntarily determining an individual's suitability for an athletic position, standing or ranking determining an individual's suitability for an honour, award or similar benefit, including a scholarship or bursary
    - the medical treatment of the individual and the individual is unable to give consent, or
    - where the collection, use, or disclosure of the information is clearly in the interests of the individual and consent cannot be obtained in a timely way
- Consent can be withdrawn as long as it is done in writing and does not hinder our performance of a legal obligation
- An individual can object to their personal information being used in processing if there are no compelling legitimate grounds to continue

## DISCLOSURE

### Disclosure in General

- Fusion FC
  - does not provide or sell personal information to third parties for commercial purposes
  - may provide personal information to third parties to distribute to or gather information from members
  - may provide personal information of its members to the Board of Directors



- If information is to be shared with parties outside Fusion FC, a contract between the parties will be signed such as a
  - Memorandum of Understanding
  - Confidentiality and Information Sharing Agreement or
  - Service Contract
- Disclosure of personal information will be made if required by law

#### Disclosure To Affiliates

- When facilitating membership in an affiliate such as an affiliate club providing training or programming, Fusion FC will disclose to the affiliate
  - member/player name
  - player age and level of play
  - contact information or alternate contact information, if available

#### Disclosure To Other Members

- Members sitting on the Fusion FC Board of Directors or on Committees may share personal contact information among the members of that group if consented to at the time of joining the group
- A member may request not to receive announcements if practical to exclude the member.

#### Disclosure To Other Entities

- Fusion FC may facilitate (at its discretion)
  - announcements, surveys or other communications on behalf of
    - BC Soccer or Canada Soccer
    - other programs

## RETENTION AND DESTRUCTION OF DATA

- Retention of personal information is limited
  - to the length of time necessary to fulfil its purpose
  - as required by laws such as the Income Tax Act
- Where personal or confidential information has been shared externally and is no longer serving its purpose, the third party is required to permanently destroy the information.



## MAINTAINING ACCURACY

- Fusion FC makes efforts to maintain accuracy of personal information through
  - regular communication with members
  - annual renewal processes for membership
  - following up on returned email and mail
  - periodic requests to verify information
- An individual may request a correction to their personal information by
  - updating information during registration
  - email
  - mail
- Fusion FC will take steps to delete personal information if an individual requests as long as it is no longer needed to meet processing, legal or regulatory obligations

## EMPLOYING SAFEGUARDS

- Safeguards appropriate to the sensitivity of the personal information include:
  - organizational (e.g., training, policies, procedures, guidance, confidentiality agreements, contracts, internal controls, shredding and audits)
  - physical (e.g., locks, alarms and securing information out of sight)
  - technological (e.g., passwords, encryption, firewalls, data leakage prevention, intrusion detection, access control, updates and recovery)

## PROVIDING ACCESS AND INFORMATION

- An individual is provided access to their personal information
  - upon request, using the prescribed form if applicable
  - in hard copy or electronically in a commonly used format

## BREACH MANAGEMENT

- A privacy breach occurs when there is unauthorized access to or collection, use, disclosure or disposal of personal information
- The most common privacy breach happens when personal information of players or employees is stolen, lost or mistakenly disclosed



- Examples include when
  - a computer containing personal information is stolen or
  - personal information is mistakenly sent or made available to the wrong person
- Any employee or contractor that becomes aware of a privacy breach is responsible for notifying the Privacy Officer immediately
  
- The Privacy Officer will
  - identify the information, cause and extent of the breach
  - determine the number of individuals affected
  - contain the breach
  - evaluate risks and determine whether harm could come to affected parties
  - collaborate with management on notification to affected parties
  - report (if necessary) on the prescribed form to the applicable privacy office (ie, the Office of the Privacy Commissioner for BC)
  - determine if any other parties should be notified
  - cooperate with authorities during breach investigations

## COMPLAINT HANDLING

- An individual can challenge compliance with privacy legislation by Fusion FC through
  - informal complaint to Fusion FC
  - formal complaint to Fusion FC
  - formal complaint to the Office of the Information and Privacy Commissioner for BC

## BREACH OF POLICY

A breach of this policy may result in disciplinary action against an employee, Board member, committee member, player or volunteer. This action will depend on the:

- seriousness of the incident
- frequency of incidents
- any other relevant factor

In the case of an employee, action may range from a warning up to termination of the employee.



## SAFE REPORTING OF A SUSPECTED POLICY BREACH

An employee

- may report a suspected breach to Fusion FC's Executive Director, Fusion FC's Operations manager, the Privacy Officer or another person in authority
- will be protected from any form of retaliation

The concern will be investigated and the employee will be informed of the outcome.

Regardless of the outcome, a complainant, as well as anyone providing information, will be protected from any form of retaliation with respect to his or her employment with or membership with Fusion FC.

## INQUIRIES

This policy is set by Fusion FC as part of its responsibility to ensure that compliance with governing laws. For inquiries, please contact Fusion FC's Executive Director or Fusion FC's Board of Directors.