



ETOBICOKE FOOTBALL CLUB

PRIVACY POLICY & TERMS OF USE

DESCRIPTION:

Process in which member information is collected, stored and used.

DEFINITIONS:

EFC: is defined as the Etobicoke Football Club Inc., which operates as the Etobicoke Football Club and any related entities.

Individual: is defined as EFC's past, present or potential individual members, players, the guardians of members and players, volunteers and referees.

Personal Information: is defined as any personal information about an Individual that EFC collects, processes or uses.

Collector: is defined as any director, officer, employee, volunteer or authorized agent of EFC who collects Personal Information.

Policy: refers to this Privacy Policy.

ACCOUNTABILITY:

EFC has appointed the Club Admin Manager as the personal information compliance officer (the "Officer").

Collectors of Personal Information shall be accountable for such information to the Officer. This Policy shall be made available to Individuals upon request. Any Personal Information that is transferred to a third party for processing is subject



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to this Policy. EFC shall use contractual or other appropriate means to provide a level of protection of the Personal Information that is comparable to this Policy while the information is being processed by a third party.

Personal Information to be collected, retained or used by EFC shall be collected, retained or used only after approval of the Officer. Such information shall be secured in accordance with the instructions of the Officer.

Any person who believes that Personal Information is collected, retained or used by EFC other than for purposes approved by the person may contact the Officer to register a complaint or to make any related inquiry by submitting a Request/Complaint to:

EFC Admin Manager

via - admin@etobicokefc.com

Should an Individual require a different means of submitting a Complaint/Request for accessibility reasons, please contact the Officer at (416) 219.3148.

Requests/Complaints must contain the following information:

- The subject must clearly identify that it is a Privacy Request or a Privacy Complaint;
- The Request/Complaint must clearly identify their full name (and the relationship of the Individual the Request/Complaint is being made in respect of);
- The Request/Complaint must specify the relationship of the Individual to the Club (i.e. player, member etc.);
- The Request/Complaint must provide sufficient detail about what is being Requested/Complained about);
- Any other information that would be required to process the Request/Complaint



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Upon receiving a Complaint/Request from any person with respect to the collection, retention or use of Personal Information, the Officer shall promptly investigate the Complaint/Request and notify the person regarding the Officer's findings and corrective action taken, if any.

Upon receiving the response from the Officer, the person who filed the Complaint/Request may, if he or she is not satisfied, appeal to EFC's Club Director for an independent evaluation and response with respect to the Complaint/Request.

The determination of the Governance Committee shall be final and the Officer shall abide by and implement any of its recommendations.

The Officer shall communicate and explain this Policy and provide training with respect thereto to all persons who may be in a position to collect, retain or use Personal Information.

Purposes for Collecting Personal Information

EFC requires personal information for the following purposes:

- OS, PHSA and EFC insurance purposes;
- registering players with the OS as recreational or competitive players;
- registering administrators, coaches and managers with the OS;
- registering teams with the OS and OS approved and sanctioned competitions;
- monitoring player registration to team rosters;
- monitoring the operation of indoor and outdoor leagues governed by the EFC;
- communicating technical programs;
- recruiting, training and registering players to Club teams, conducting player development and competing on a Club, District or Regional basis;



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- delivering referee training, development and certification courses for game officials, providing mentoring services, and conducting referee assessments,
- conducting disciplinary hearings, issuing fines, hearing appeals from Registrants concerning Members, and for responding to appeals or appealing decisions to the PHSA according to the OS's Published Rules and maintaining records of such disciplinary matters;
- ensuring compliance by Registrants whether they be, administrators, staff, coaches, managers, players, or supporters of the Published Rules of the EFC, PHSA, the OS, the CS and FIFA in ascending priority;
- investigating complaints by OS registrants re: EFC Registrants;
- monitoring and communicating with indoor or outdoor sanctioned leagues operating within or outside the City in which EFC Teams participate;
- registering, transferring, deregistering and releasing players between Club, district, provincial, extra-provincial and international teams and soccer organizations;
- administering player transfers from amateur to professional status or the reverse; and Validating participation in Club meetings, committee meetings, special meetings and annual general meetings.

Personal information may be made available to the following people:

- EFC administrators, staff and Directors, EFC Coaches and their staff, and representatives who serve on Committees and other volunteers,
- The EFC or OS's insurer and insurance broker and their staff and representatives,
- League administrators and facility managers, both internal and external,
- Administrators, staff and representatives of EFC, PHSA and OS sanctioned leagues,
- Administrators, volunteers and representatives of competitions such as the Ontario Cup, the Ontario Indoor Cup and other tournaments in Ontario, Canada or Internationally; and administrators, staff or representatives of other Clubs, district associations, the OS, the CS, Concacaf, FIFA, or any international soccer organization sanctioned by FIFA.



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Personal Information is only disclosed to these individuals, to deliver services or programs and perform discipline, appeals or conduct governance duties as required by the published rules of the EFC, PHSA, the OS, CS, Concacaf or FIFA in ascending order of priority.

EFC requires disclosure of player names, addresses, proof of birth, and soccer history. Parents/Legal guardian information is requested if a player is under 18 years of age, or player information if over 18 years of age including; address, occupation, home phone, work phone, emergency phone number, and e-mail.

EFC requires disclosure of names, addresses and contact information of all registered administrators, coaches, managers, membership staff and referees, as the case may be.

Consent

The Officer shall ensure that the Individual from whom Personal Information is collected consents to the collection, use and/or disclosure of the Personal Information.

The Officer shall ensure that the Individual can reasonably understand the purpose of collecting Personal Information and how it may be used at the time consent is given.

The Officer shall ensure that there is no condition attached to the supply of benefits requiring an Individual to provide consent for the collection, use, or disclosure of Personal Information beyond that required to fulfill the specified and legitimate purposes.



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The Officer shall ensure that express consent is obtained wherever possible and appropriate. In circumstances where, in the opinion of the Officer, having regard to the sensitivity of the information and the purpose and intent of this Policy, implied consent might be acceptable.

In obtaining consent, the Officer shall ensure that the reasonable expectations of the individual are respected.

The Officer shall ensure that the express consent obtained from an Individual is clear and in an appropriately verifiable form.

The Officer shall ensure that the Individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. The Individual shall promptly be informed of the implications of such withdrawal.

Limiting Collection

The Officer shall ensure that Personal Information will not be collected indiscriminately. Both the amount and type of information collected shall be limited to that which is necessary to fulfil the purposes identified. The Officer shall specify the type of information to be collected, in accordance with the “Openness” principle.

The Officer shall ensure that Information is collected only by fair and lawful means without misleading or deceiving Individuals about the purpose for which information is being collected.

The Officer shall ensure that the “Identifying Purposes” and “Consent” principles are followed in identifying the purposes for which Personal Information is to be collected.

Limiting Use, Disclosure, and Retention

The Officer shall ensure that Personal Information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the Individual, or as required by law, and any use of Personal Information shall be properly documented.



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The Officer shall ensure that all Personal Information is destroyed, erased or made anonymous as soon as the purpose for which it was collected is no longer relevant, or as permitted by law. There shall be an automatic review of the need to continue the retention of Personal Information on an annual basis. Except as required to be retained by law, all Personal Information shall be deleted, erased or made anonymous no later than seven years after the purpose for which it was collected has been completed.

The Officer shall ensure that all use, disclosure and retention decisions are made in light of the “Consent”, the “Identifying Purposes” and the “Individual Access” principles.

The officer shall ensure that all Membership, administrator, player, coach, manager, team staff, and volunteer registration files be maintained for seven years, as required by the OS.

Accuracy

The Officer shall ensure that Personal Information is accurate, complete and up-to-date as is reasonable taking into account the interests of the Individual. The Officer shall ensure that the information is sufficiently accurate, complete and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about an Individual.

The Officer shall ensure that EFC does not routinely update Personal Information unless such a process is necessary to fulfil the purposes for which the information was collected.

The Officer shall ensure that Personal Information used on an ongoing basis, including information that is disclosed to third parties, is accurate and up-to-date, unless limits to the requirement for accuracy are clearly set out.

Safeguards

The Officer shall ensure that EFC has security safeguards to protect Personal Information from loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. The Officer shall ensure such protection of Personal Information regardless of the format in which it is held.



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Depending on the sensitivity of the information, the Officer may permit reasonable discretion regarding the information that has been collected, the amount, distribution and format of the information, and the method of storage. A higher level of protection shall safeguard more sensitive information.

The Officer shall ensure that the methods of protection are sufficient and might include:

- Physical measures (i.e. locked filing cabinets and restricted access to offices);
- Organizational measures (i.e. security clearance and limiting access on a “need-to-know” basis); and
- Technological measures (i.e. the use of passwords and encryption).

The Officer shall ensure that all directors, officers, employees, volunteers, coaches, referees and agents of EFC are aware of the importance of maintaining confidentiality of Personal Information. The Officer shall ensure that care is taken when Personal Information is disposed of or destroyed to prevent unauthorized parties from gaining access to the information

Openness

The Officer shall ensure that EFC is open about the Policy and any related practices or procedures which are not explicitly set out in the Policy. The Policy and any such related practices or procedures shall be made available without unreasonable effort and shall be made available in a form that is generally understandable. The Officer shall ensure that any information provided regarding the Policy and related practices and procedures shall include:

- the name and contact address of the Officer who is accountable for implementation of the Policy and related practices and procedures;
- the means of gaining access to Personal Information held by EFC;



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- a description of the type of Personal Information held by EFC, including a general account of its use;
- a copy of any brochures or other information that explain EFC's Policy and related practices and procedures; and what Personal Information is made available to related organizations.

The Officer shall ensure that the information provided in accordance with 10.2 is available either in a document or online.

Individual Access

The Officer shall ensure that upon request, EFC shall:

inform an Individual whether or not EFC holds Personal Information about the Individual;

where possible, inform the Individual as to the source of the information;

allow the Individual access to the Personal Information;

provide an account of the use that has been made or is being made of the Personal Information; or provide an account of the third parties to which the Personal Information has been disclosed.

If the Officer believes that access to Personal Information should be denied to an Individual for, what he or she believes are valid reasons, the Officer shall consult legal counsel before allowing access to any Personal Information.

The Officer may require an Individual to provide sufficient information to permit EFC to provide an account of the existence, use, and disclosure of Personal Information. Information obtained for this purpose shall only be used for this purpose.

When disclosing information to provide an account of the third parties to which the Personal Information has been disclosed, the Officer shall ensure that the report given is as specific as possible.



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The Officer shall ensure that EFC responds to an Individual's request within a reasonable time. The requested information shall be provided or made available in a form that is generally understandable.

The Officer shall ensure that when an Individual successfully demonstrates the inaccuracy or incompleteness of Personal Information, EFC amends the information as required. Depending upon the nature of the information challenged, amendment involves the correction, deletion, or addition of information. Where appropriate, the amended information shall be transmitted to third parties having access to the information in question.

The Officer shall ensure that a record is kept of all unresolved challenges which includes the substance of the unresolved challenge. When appropriate, the existence of the unresolved challenge shall be transmitted to third parties having access to the information in question.

Challenging Compliance

The Officer is authorized to address a challenge concerning compliance with the above principles.

The Officer shall develop and put procedures in place to receive and respond to complaints or inquiries about the Policy and the handling of Personal Information. The compliance procedures shall be easily accessible and simple to use.

The Officer shall inform individuals making inquiries or complaints of the existence of the relevant complaint procedures.

The Officer shall investigate all complaints. If a complaint is justified, the Officer shall take appropriate measures, including, if necessary, amending the Policy and related practices and procedures.