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1.0 Purpose

The purpose of this policy is to inform the reader about RMASC’s privacy practices and compliance with privacy legislation. It is also intended to provide guidance to RMASC employees concerning the protection of personal information that RMASC collects and uses in the course of business

2.0 Policy Details

Legal Compliance

RMASC complies fully with the applicable privacy legislation governing the collection, use, protection and disclosure of personal information.

RMASC has designated the Secretary of the Board as the Privacy Officer with responsibility for enforcing this policy. Anyone with questions about this policy or wishing to have access to their personal information at RMASC can contact the Privacy Officer.

Privacy legislation is readily available on the Internet, along with guides to understanding the law and instruction on how to contact the government to report a suspected violation.

Collection and Disclosure of Personal Information

RMASC collects personal information about individuals such as program participants, members, partners, and vendors. Information is collected only to the extent necessary for conducting our business relationships and complying with legal or regulatory requirements. We also collect personal information about employees and applicants in order to administer the employer/employee relationship and meet various reporting obligations. For example, we require certain personal employee information to administer payroll, benefits and pension programs, to monitor safety performance, meet insurance obligations, and monitor the use and protection of RMASC assets.

Only the amount and type of information that is necessary for these purposes will be collected, and where practical we collect it directly from the individual. This information is not disclosed unnecessarily within RMASC or disclosed externally without the



individual's consent except as required to meet legal or regulatory requirements. We use personal information only for reasonable and justifiable business purposes that are usually explained when the information is collected. Where external disclosure is required, we disclose only what is necessary and endeavor to ensure the other party is aware of their obligations under privacy legislation.

Consent

In most cases we require the individual's consent to the collection and use of personal information. We will obtain express (specifically stated) consent where the sensitivity of the information or our use of it warrants this. In other circumstances, we rely on implied consent as allowed by the legislation and in line with normal business practice. Consent is not required for the collection of personal employee information that is necessary for administering the employer /employee relationship.

Whether consent has been stated or implied, the individual is free to withdraw consent at any time by contacting RMASC's Privacy Officer. However, the withdrawal of consent may affect some aspects of our business relationship with the individual that require the information.

Personal information may be obtained without consent in situations allowed by the legislation. These include, for example, investigations of a breach of law or contract, emergency situations and situations where the individual might be unavailable due to illness.

Accessing and Correcting Personal Information

Privacy legislation entitles the individual to access any personal information ACA has about them. This might occur, for example, if a person believes the information, we have about them is incorrect. Requests for access must be made in writing to RMASC's Privacy Officer. We will respond within the period required by the legislation. Accessing the information may be subject to a fee as allowed by the law. It is RMASC's policy to not charge a fee for access to employee personal information.

An individual wishing to change any personal information about them in our records must make a request in writing. When we make the change, we will send correction notifications to any other organizations to whom we disclosed the information. If we decide not to change the information, we will attach a note to the information that a request for change was received.

The law requires that access to personal information be restricted or denied in certain circumstances. For example, we cannot allow access where doing so might reveal personal information about another individual or expose confidential commercial



information. If we are unable to give someone access to their information, we will advise them of this in writing with an explanation that includes reference to the relevant section of the legislation and instructions on how to challenge the restriction.

Security of Information

RMASC will take reasonable measures to protect personal information from loss, alteration or illegal disclosure. Access will be allowed only on a need-to-know basis. Inactive records containing personal information will be destroyed when legally allowable and using secure procedures.

3.0 Policy Scope

This policy applies to Rocky Mountain Adaptive Sports Centre (“RMA”). The term “employees” is used to refer collectively to the employees, volunteers, directors and officers of RMA, and consultants, contractors and other persons engaged by RMA to act on its behalf.

4.0 Related Policies

POL_3100_ Operations Policies_General_Code of Business Conduct and Ethics

5.0 Policy Owner

Board Chair

6.0 Definitions

Personal information is information about an identifiable individual that is not publicly available from such sources as telephone directories and government registries. Business contact information of the sort found on business cards is not considered by the legislation to be personal information.



7.0 Procedures

N/A