

Privacy Statement

The privacy of personal information is of great importance to *Girls on the Run Greater Toronto Area*(GOTR-GTA). GOTR-GTA has therefore developed this Privacy Policy based on the standards required by *Personal Information Protection and Electronics Documents Act* (“PIPEDA”) and its interpretation of these responsibilities. This policy describes the way that our organization collects, uses, and discloses personal information in the course of our commercial activities, and commits to doing this in a responsible manner.

Personal Information

Personal information is information about an identifiable individual and includes information that relates to their personal characteristics (e.g., gender, age, income, home address or phone number, ethnic background, family status), their health (e.g., health history, health conditions, health services received by them) or their activities and views (e.g., religion, politics, opinions expressed by an individual, an opinion or evaluation of an individual). Personal information, however, does not include business information (e.g., an individual’s business address and telephone number), which is not protected by PIPEDA.

Accountability

The Council Director of GOTR-GTA is responsible for the monitoring of personal information collection, use, disclosure, data security and ensuring that all staff receives appropriate training on privacy issues. The Council Director also handles personal information access requests and complaints. The Council Director may be contacted at the following address:

Girls on the Run York Region & GTA
c/o Council Director – Privacy Policy
P.O. Box 156
Kleinburg, Ontario
L0J 1C0
Email: rina@girlsontherun.ca
Tel: 416.798.8836
Fax: 416.798.8830

Purpose

Personal information will only be collected by GOTR-GTA to meet and maintain the highest standard of organizing and programming. The GOTR-GTA collects personal information from prospective program participants, parents, coaches, volunteers, race participants, and school officials for purposes that include the following:

- a) Participant name, address, phone number, e-mail address for the purpose of receiving communications from GOTR-GTA and its coaches regarding GOTR-GTA programs, events, and activities (e.g., 411 Update, E-update, email correspondence, brochure distribution, etc).
- b) Participant first name and city for purposes of providing Girls on the Run International data to charge GOTR-GTA its annual fee (charged based on number of participants).
- c) Participant name and school for those in the jurisdiction of York Region District School Board to meet their disaster planning data collection and operations procedures in the case of an emergency effecting after school program (s).

- d) Participant date of birth, age, and school grade to determine age group and program eligibility in *Girls on the Run* or *Girls on Track* or camp program or other activities and workshops; and for statistical analysis of program uptake, reenrollment and curriculum administration.
- e) Participant t-shirt size so correct shirt can be ordered for the race/event.
- f) Name of parent/guardian of participant, address, home phone number, work phone number, cell phone number, e-mail address for the purpose of participation consent, emergency contact, and receiving communications from GOTR-GTA and its coaches regarding programs, events, and activities.
- g) School name, district, address, phone number and fax number for program administration and communications purposes.
- h) Coach's name, school, contact phone number, email address for program coordination and delivery purposes.
- i) Valid First Aid/CPR Training credentials, Policy Checks and related personal reference information such as Drivers License for the purpose of implementing GOTR-GTA's screening program for Coaches and Assistant Coaches, program staff and board members as needed.
- j) Credit card or chequing information for registration at programs, activities and events; and collection of fundraising proceeds from corporate sponsors.
- k) Video footage and photographs at the sessions, camp, running/walking event(s) for promotion, media publications and posting on GOTR-GTA's website, displays or posters.
- l) Participant health history such as current diagnosis, disability; concerns (i.e., allergy) as well as provincial health card numbers, contact information of parent/guardian and doctor for use in the case of medical emergency or reports relating to medical or emergency issues.
- m) Marketing information including attitudinal and demographic data on individual participants to determine demographic structure, and program wants and needs.
- n) Name and contact information of board members, volunteers and committee members for the purpose of communication within and between committees, volunteers and Board members.
- o) Résumé and bio information for application to the board of directors or committee positions.

Consent

By providing personal information to GOTR-GTA, individuals are consenting to the use of the information for the purposes identified in this policy. If a purpose has not been identified herein, GOTR-GTA will seek consent from individuals when personal information is used for a purpose not already consented to. This consent will be documented as to when and how it was received.

An individual may withdraw consent to the collection, use or disclosure of personal information at any time, subject to legal or contractual restrictions, provided the individual gives one week's notice of such withdrawal to the GOTR-GTA. The Council Director will advise the individual of the implications of such withdrawal.

Limiting Collection

All personal information will be collected fairly, by lawful means and for the purposes as specified in this policy. The GOTR-GTA will not use any form of deception to obtain personal information.

Limiting Use, Disclosure and Retention

Personal information will not be used or disclosed by GOTR-GTA for purposes other than those for which it was collected as described herein, except with the consent of the individual or as required by law.

GOTR-GTA may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where GOTR-GTA has reasonable grounds to believe the information could be useful in the investigation of an unlawful activity, or to comply with a subpoena or warrant or an order made by the court or otherwise as permitted by applicable law.

Information disclosed to a third party with consent from the individual will be protected by a third party agreement to limit use and disclosure.

Personal information will be retained for certain periods of time in accordance with the following:

- a) Personal contact information of participants, parent/guardian, event registrants, coaches, volunteers, school administrators, GOTR staff and GOTR board members such as address, phone number, cell phone number, and fax number will be retained for an unlimited period and stored in an electronic database with strict access limited to the Council Director or designated GOTR staff.
- b) Participant personal information such as date of birth, age, school grade, t-shirt size, and health history will be retained for a one year period should the participant want to reenroll, and will be stored in an electronic database with strict access limited to the Council Director or designated GOTR staff.
- c) Personal health information of participants will be kept on hand during the duration of the program and destroyed immediately following the program, camp, or other activity in which the information was collected. Access to the information will be strictly limited to the coach, school and Council Director/designated staff.
- d) Personal contact information, qualifications and certifications of coaches will be retained for a period of two years after a coach has left GOTR-GTA and will be stored in an electronic database with strict access limited to the Council Director or designated GOTR staff.
- e) Employee information will be retained for a period of seven years in accordance with Canada Customs and Revenue Agency requirements and stored under lock and key or in electronic databases.
- f) Marketing information will be retained for an unlimited period and will be stored in an electronic database with strict access limited to the Council Director or designated GOTR staff.
- g) E-mail addresses will be retained for an unlimited period and will be stored in an electronic database with strict access limited to the Council Director or designated GOTR staff.
- h) Credit Card and chequing information will be destroyed immediately upon completion of a financial transaction;

Accuracy

GOTR-GTA will use accurate and up-to-date information as is necessary for the purposes for which it is to be used, to minimize the possibility that inappropriate information may be used to make a decision about an individual.

Safeguards

GOTR-GTA will protect personal information using security safeguards appropriate to the sensitivity of the information against loss or theft, unauthorized access, disclosure, copying, use or modification.

Methods of protection and safeguards include, but are not limited to, locked filing cabinets, restricted access to offices, security clearances, need-to-know access and technological measures including the use of passwords, encryption and firewalls.

The following steps will be taken to ensure security:

- a) Paper information is either under supervision or secured in a locked or restricted area.
- b) Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers.
- c) Paper information is transmitted through sealed, addressed envelopes or in boxes by reputable courier/delivery companies or delivered in person by the Council Director or designated GOTR-GTA staff.
- d) Electronic payment information is gathered by Active.com with encrypted transmission.
- e) Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with this policy.
- f) External consultants and agencies with access to personal information will provide the GOTR-GTA with appropriate privacy assurances.

GOTR-GTA will destroy personal information in a responsible and secure manner. Hardcopies of forms and documents will be destroyed by way of shredding and electronic files will be deleted in their entirety. When hardware is discarded, the GOTR-GTA will ensure that the hard drive is physically destroyed.

Openness

GOTR-GTA will provide information about its policies and practices relating to the management of personal information through GOTR-GTA's web site or upon request by contacting the Council Director

Individual Access

Upon written request to the Council Director, an individual may be informed of the existence, use and disclosure of his or her personal information and will be given access to that information. As well, an individual is entitled to be informed of the source of the personal information along with an account of third parties to whom the information has been disclosed.

Requested information will be disclosed to the individual within 30 days of receipt of the written request at no cost to the individual, or at nominal costs relating to photocopying expenses, unless there are reasonable grounds to extend the time limit.

If personal information is inaccurate or incomplete, it will be amended as required.

An individual may be denied access to his or her personal information if:

- a) This information is prohibitively costly to provide;
- b) The information contains references to other individuals;
- c) The information cannot be disclosed for legal, security or commercial proprietary purposes;
- d) The information is subject to solicitor-client or litigation privilege.

Upon refusal, GOTR-GTA will inform the individual of the reason(s) for the refusal and the associated provisions of PIPEDA.

Challenging Compliance

An individual may challenge GOTR-GTA's compliance with PIPEDA, by submitting a challenge in writing. Upon receipt of a written complaint, GOTR-GTA will:

- a) Record the date the complaint is received;
- b) Notify the Council Director who will serve in a neutral, unbiased capacity to resolve the complaint;
- c) Acknowledge receipt of the complaint by way of telephone conversation and clarify the nature of the complaint within three business days of receipt of the complaint;
- d) Appoint an investigator using GOTR-GTA personnel or an independent investigator, who will have the skills necessary to conduct a fair and impartial investigation, and who will have unfettered access to all files and personnel, within ten business days of receipt of the complaint.
- e) Upon completion of the investigation and within 25 business days of receipt of the complaint, the investigator will submit a written report to the GOTR-GTA,
- f) Notify the complainant of the outcome of the investigation and any relevant steps taken to rectify the complaint, including any amendments to policies and procedures, within 30 business days of receipt of the complaint.

An individual may appeal a decision made by the GOTR-GTA, in accordance with the GOTR-GT's policies for appeals.

IP Address

When the user's web browser requests a web page from another computer on the Internet, it automatically gives that computer the address where it should send the information. This address is called the computer's "IP address."

GOTR-GTA does not collect, use or disclose IP Addresses.

Cookies

Cookies are small text files that a Web browser transfers to and from your hard drive for record keeping purposes. Cookies make life easier for you by saving your passwords, purchases, and preferences while you're at our site. The use of cookies is an Internet standard, and you'll find cookies at most major Web sites.

The use of cookies is an industry standard and many major browsers are initially set up to accept them. You can reset your browser to either refuse to accept all cookies or to notify you when you have received a cookie. However, if you refuse to accept cookies, you may not be able to use some of the features available on websites.

GOTR-GTA does not use cookies to identify specific individuals.

Copyright and Legal Disclaimer

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Applicable Law

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