

PRIVACY POLICY



Last updated: October 2021

Introduction

The Coaching Association of Canada ("CAC" or "We") is a not-for-profit amateur sport organization providing coaches with the necessary foundation of skills, knowledge, and attitudes to foster excellence in sport. The CAC is committed to protecting the privacy and security of your information. This Privacy Policy ("Policy") is designed to help you understand what information we collect, why we collect it, how we use it, and how you can manage your information with us.

By clicking "I agree", by using or accessing our Services, or otherwise signaling your acceptance and interacting with us, you consent to the collection, use, transfer, and disclosure of your personal information by the CAC in accordance with the terms and for the purposes set out in this Policy, as may be amended from time to time. Before you provide us with any personal information, we will request, and you must provide your express consent to our collection, use, transfer, and disclosure of your personal information as described in this Policy.

The CAC complies with data privacy laws and regulations applicable in the jurisdictions in which we operate. This Privacy Policy sets out how the CAC collects, uses, and discloses Personal Information during the course of our activities and how we strive to ensure that Personal Information in our possession remains accurate and confidential. This Policy does not apply to the collection, use, or disclosure of Personal Information by our National Coaching Certification Program ("NCCP") Partners and other Partners. To determine the purpose and scope of data collection, and further processing and use of Personal Information by our Partners, please refer to their respective privacy policies.

What this Policy Covers

The Privacy Policy informs you of our privacy practices as applied to personal information about identifiable coaches, coach developers, officials, participants in or attendees at CAC events or promotions, and visitors to our websites (<u>www.coach.ca</u> and <u>www.thelocker.coach.ca</u>) that is collected, used, or disclosed by the CAC. For more information, please contact us at the address listed below. A copy of our full Privacy Policy follows these highlights.

Summary of the CAC's Privacy Policy

We may collect the following Personal Information when you contact us, register with us, use our services, or otherwise provide us with information about you:

- First and last name;
- Contact information, such as your email address, mailing address, and telephone number;
- Coaching information, such as your NCCP Number, your coaching transcript, courses registered for and completed;
- Information collected when you contact us, visit our website, register for an account, use our services, or participate in courses, events, and other initiatives;

- Information from cookies;
- Information from third parties, such as information provided to us by our NCCP Partners and other Partners;
- Any other personal information that you choose to provide to us.

We use information to:

- Provide you with the information and services you request as explained in our full privacy statement
- Help us develop new initiatives, activities, courses, events, and services
- Help us run our website
- Tell you about our initiatives, activities, courses, events, and services
- Create aggregated or de-identifiable information for the purposes of reporting to governmental agency funders, demographic research, program research, and forecasting.
- Administer the National Coaching Certification Program (NCCP) and maintain the associated database

We share your information with:

- Individuals or organizations who are our advisors and consultants
- Our Partners, as explained in our full privacy statement
- Governmental Agency Funders
- Service providers, such as cloud service providers and as necessary with third parties that help run our website and database
- Service providers who help facilitate initiatives and activities
- Legal and law enforcement agencies where required by law
- Other third parties with your consent and where permitted or required by applicable law, as explained in our full privacy statement

Choices

- Depending on the services or use of our websites, your choices may include the following:
 - Access and Correction: You can ask us to update, correct, or delete information that we have about you, subject to legal or contractual restrictions. You may also update, correct, or delete certain types of your Personal Information in The Locker via the "Profile" tab after logging in to The Locker. You can also ask us to make these changes for you. Please



note that deleting certain information may impact your coaching status and which services you can access.

- Cookie Settings and Preferences: You can disable cookies and other tracking technologies through your browser. While doing so may negatively affect your experience with the use our website, it will not prevent us from transacting with you.
- Marketing Emails: We seek to comply with applicable electronic marketing laws. We provide you with an opportunity to let us know your preference in terms of receiving promotional email when you register for our services, provide us with Personal Information, or when we send emails.
- Opt-Outs: You may opt-out of further contact from us as well as certain other uses of personal information for promotional or personalization purposes. as explained in the full privacy statement

How to contact us:

Questions, concerns, or complaints relating to our Privacy Policy or the treatment of personal information should be sent by email to <u>coach@coach.ca</u> or by calling 613-235-5000, ext 2365 and asking to speak with the CAC's Privacy Officer.

Full Version of the CAC's Privacy Policy

This policy covers the following:

- 1. The Type of Personal Information We Collect and How We Collect It
- 2. How We Use Your Personal Information
- 3. How We Share your Personal Information
- 4. Accuracy, Retention, and Storage of Personal Information
- 5. How We Protect Personal Information
- 6. Access to and Correction of Your Personal Information
- 7. Legal Disclaimer
- 8. Policy regarding Children
- 9. Your Choices with Respect to Collection, Use, and Disclosure of Your Personal Information
- 10. Openness and Challenging Compliance
- 11. Changes to this Policy and How to Contact Us for More Information

What is Personal Information?

This Policy applies to the Personal Information we collect from you and about you. "Personal Information" is any information about an identifiable individual and includes any information that relates to you and



identifies you personally, either alone or in combination with other information. Personal Information may or may not include business contact information, depending on the jurisdiction.

We may use your personal information to generate anonymized or aggregated data from which you cannot be identified, which we may use and disclose for the CAC's purposes in our sole discretion.

The CAC only collects, uses, and discloses Personal Information for purposes that would be considered reasonable in the circumstances and only such Personal Information as is required for the purposes of providing services or information to participants, partner organizations, and others.

1. The Type of Personal Information We Collect and How We Collect It

The CAC collects two types of information:

- Information we receive from you; and
- Information we receive from others about you.

Information we receive from you includes information you share with us, such as when you create an account on The Locker on our website. This also includes information you provide us verbally and in writing, and through technology, such as through cookies placed on your computer when you visit our website. We also receive information from other sources, including NCCP Partner organizations and third parties to help us supplement our records (e.g. from National Sport Organizations).

The personal information we collect about you includes

Contact information

- Name
- Address
- Email Address
- Phone Number
- Date of Birth

Demographic Information

- Armed Forces
- RCMP Designation
- Indigenous Identity
- Disability Status
- Gender Identity
- Language Preference

Coaching Information

- Coach Transcript
- Professional Coaching Designation
- Professional Development Points
- National Coaching Certification Program (NCCP) Number
- Courses Registered For, Taken, and Completed
- Certifications Achieved

Professional Coaching Information

If you apply to become a Professional Coach or an Advance Coaching Diploma we may request other personal information including:

- Citizenship
- Education History
- Employment Status
- References
- Criminal Record Checks

Event Information

• Events Registered or and Attended

Surveys

We may conduct satisfaction or other surveys. Your participation in these surveys is always voluntary. Details of whether and which personal information is collected, stored, and processed in each specific survey can be found in the description of the relevant survey.

Social Media Information

We maintain a Facebook page, Twitter profile, Instagram page, LinkedIn account, and YouTube channel to interact with the public. If you interact with our Facebook page, Twitter profile, Instagram Page, LinkedIn account, or YouTube channel (e.g. "liking" our Facebook page, "following" our Twitter profile, "following" our Instagram Page, "liking" our LinkedIn post, or "subscribing" to our YouTube channel) the personal information on the social media platform declared by you as public or publicly available, such as your social media name, User ID, age, gender, profile picture, friends list, and other Personal



Information can be transmitted to us by the social media company. Please note that we have no influence on the information collected, used, and disclosed by these companies. The purpose and scope of data collection, and further processing and use of the data by Facebook, Twitter, Instagram, LinkedIn, and YouTube can be found in their respective privacy policies.

Websites and Log Data

When you access our websites, certain information is automatically transmitted to us and stored in "log files". In particular, the following information is stored in log files:

- IP address
- Name of the retrieved files and/or information
- Date, time and duration of the retrieval
- The volume of data transmitted
- Referrer URL (the last website visited)
- HTTP status code
- Device type (user interface string, e.g. iOS, Android, operating system used)

This information is collected to provide and run our websites, to ensure technical operation, to identify and resolve issues, and to investigate criminal offences. If it is no longer required for the reasons stated, this information is deleted after 30 days. If the information is required for a longer period of time, it will be stored until no longer required. In some cases, this information may be shared with investigating authorities. This information is stored separately from all other personal information about you.

Cookies and Tracking Tools

Our website uses "cookies" and other tracking mechanisms to make your visits to our website and social media platforms more enjoyable and to allow you to use certain features. Cookies are small text files that are stored on your device when you visit a website or other online application. Many cookies contain what is known as a "cookie ID." A cookie ID is a unique identifier that consists of a string of characters that websites and servers use to distinguish your browser from other browsers that store different cookies and to recognize each browser by its unique cookie ID.

The cookies we use enable us to identify the connections between the browser and the server, for identification or access authorization, and for statistical purposes (e.g. number of unique website visitors). Some cookies are deleted at the end of a browsing session and other cookies are stored on your device indefinitely.

"Session" cookies are temporary bits of information that are erased once a visitor exits its web browser window or otherwise turn its computer off. Session cookies are used to improve navigation on websites and to collect aggregate statistical information.

"Persistent" cookies are more permanent bits of information that are placed on the hard drive of a visitor's computer and stays there unless it is deleted. Persistent cookies store information on a visitor's computer for a number of purposes, such as retrieving certain information previously provided (e.g., passwords), helping to determine what areas of the website visitors find most valuable, and customizing the website based on visitor preferences.



We do not share Personal Information obtained through cookies with any third parties.

You can change your browser settings to delete or prevent certain cookies from being stored on your computer or mobile device without your explicit consent or altogether. The 'help' section in your browser should provide information on how to manage your cookie settings.

Consent

Unless permitted by law, the CAC does not collect Personal Information without first obtaining the consent of the individual concerned. However, the CAC may seek consent to use and disclose Personal Information after it has been collected in those cases where the CAC wishes to use the information for a purpose not identified in this Policy or not previously identified or for which the individual concerned has not previously consented.

By providing Personal Information to the CAC, you agree and consent that we may collect, use, and disclose your Personal Information in accordance with this Privacy Policy. If the CAC plans to collect Personal Information for purposes other than those disclosed in this Privacy Policy, it will inform you of those purposes at the time that the Personal Information is collected and seek your consent.

You may either refuse to give your consent to the collection, use, and disclosure of your Personal Information or withdraw your consent at any time upon reasonable notice. In certain circumstances, some services can only be offered by the CAC if you provide the CAC with consent to the collection, use, and disclosure of your Personal Information. Consequently, if you choose not to provide us with consent or withdraw your consent, we may not be able to offer you the services requested. We will inform you of the consequences of refusing to provide, or withdrawal of, your consent.

2. How We Use Your Personal Information

Except for the purposes identified in the "eCommerce" section below, the CAC only collects and uses Personal Information for the following purposes:

- 1. Administer the National Coaching Certification Program and maintain the associated database;
- 2. Administer the Women in Coaching program, Coach Mentorship Programs, the Professional Coaching Program, the Advanced Coaching Diploma program, the Responsible Coaching Movement, and other internal programs;
- 3. Track participant accreditations and registrations;
- 4. Administer our apprenticeship and grant programs;
- 5. Organize various conferences that provide professional development and networking opportunities for coaches and sport leaders;
- 6. Manage our various awards and recognition programs;
- 7. Provide information to participants, partner organizations, and others about coach education related programs and services;
- 8. Manage our relationship, and communicate, with, among others, participants and partner organizations;



- 9. Meet legal and regulatory requirements;
- 10. Manage our website and other information technology infrastructure;
- 11. Recruit, hire, manage, evaluate, compensate, and otherwise deal with our employees and contractors; and
- 12. Other reasonable purposes consistent with the above purposes.

The Personal Information we may collect from each individual will depend upon our relationship with that individual and which services the individual wishes to obtain from the CAC.

The CAC does not otherwise sell, trade, barter, exchange, or disclose for consideration any Personal Information it has collected.

3. How We Share Your Personal Information

In carrying out the purposes set out above, you expressly consent and agree that the CAC may disclose your Personal Information to:

- 1. Individuals at the relevant National Sport Organizations or their local sport associations and their chosen, vetted, associates;
- 2. Provincial or Territorial Coaching Representatives;
- 3. Individuals at the Canadian Olympic and Paralympic National Sport Institutes and their chosen, vetted, associates;
- 4. Governmental agency funders of the CAC and NCCP Partners;
- 5. Print and electronic media in connection with awards and recognition programs;
- 6. Individuals or organizations assisting the CAC in informing you about our products or services;
- 7. CAC advisers or service providers; and
- 8. Individuals or organizations involved in:

a. Maintaining, reviewing, and developing our business systems, procedures, and infrastructure including testing or upgrading our computer systems; or

b. A reorganization of the CAC.

In the event sensitive Personal Information is provided to the CAC, you expressly consent and agree that such information will not be disclosed unless it is required in order to provide a participant or partner organization with our services.

Where the CAC discloses Personal Information to organizations that perform services on its behalf, we will require those service providers to use such information solely for the purposes of providing services to the CAC, participants, partner organizations, or the person concerned and to have appropriate safeguards for the protection of that Personal Information.



In some circumstances, the CAC may disclose Personal Information without consent. Such circumstances include:

- 1. Where required by law or by order or requirement of a court, administrative agency or governmental tribunal;
- 2. Where the CAC believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety, or property of an identifiable person or group;
- 3. Where it is necessary to establish or collect monies owing to the CAC; or
- 4. Where it is necessary to permit the CAC to pursue available remedies or limit any damages that we may sustain.

Where obliged or permitted to disclose information without consent, the CAC will not disclose more information than is required.

We also use external service providers for IT, payment, processing, and event management to provide you with services. We have carefully selected these service providers and monitor them frequently. All service providers are required to maintain confidentiality and to comply with legal requirements, including privacy requirements. You hereby agree that your Personal Information may be disclosed or communicated to such third party service providers in order for the CAC to provide you with services.

We may store and process your personal information in Canada and other foreign countries, including the United States. Where personal information is stored outside of Canada (whether by a service provider or by us), it is subject to the laws of that foreign jurisdiction and may be accessible to that jurisdiction's government, courts, or law enforcement or regulatory agencies. Please also note that we have no control over the content of third party websites that individuals may access through hyperlinks at our website. We encourage everyone to read the privacy policy of every website they visit.

We reserve the right to transfer any personal information we have in the event that we merge or are acquired by a third party, or should a third party acquire all or part of our organization, or should any such transactions be proposed.

eCommerce

The CAC may from time to time on its website offer eCommerce services which might include the sale of goods or services offered by the CAC or by third party vendors.

In the course of offering eCommerce services, the CAC may collect, store, analyze, and use Personal Information that users disclose to the CAC in the course of concluding eCommerce transactions, including without limitation: contact information (such as name, email address, and physical address) and financial information (such as credit card number and expiration date). Personal Information will be used by the CAC, by third parties on the CAC's behalf and by third party vendors for purposes relating to eCommerce transactions, including without limitation fulfillment of orders, billing, payment, marketing, and customer service matters.

By entering into eCommerce transactions on the CAC website, you consent to the collection, storage, analysis, and use of your Personal Information for the purposes set forth above. The CAC may also collect, store, analyze, and use your Personal Information provided by others for the purposes set forth above, including without limitation payment processing services, and other online and offline sources.



If you do not wish to have your Personal Information used for marketing purposes, please contact the CAC's privacy officer by sending an email to communications@coach.ca or calling 613-235-5000, ext 2365 and ask to speak with the CAC's Privacy Officer.

4. Accuracy, Retention, and Storage of Personal Information

The CAC endeavors to ensure that any Personal Information provided and in its possession is as accurate, current, and complete as necessary for the purposes for which we use that information. If we become aware that Personal Information is inaccurate, incomplete, or out of date, the CAC will revise the Personal Information and, if necessary, use reasonable commercial efforts to inform third parties which were provided with inaccurate information so that those third parties may also correct their records.

We keep Personal Information only as long as it is required for the reasons it was collected. The length of time we retain Personal Information varies, depending on the service and the nature of the information. The retention period for Personal Information may extend beyond the end of an individual's relationship with us but it will be only for so long as it is necessary for us to have sufficient information to respond to any issues that may arise at a later date.

When your Personal Information is no longer required for the CAC's purposes, we have procedures to destroy, delete, erase or convert it into an anonymous form.

Currently, the principal places in which the CAC holds Personal Information are in the City of Ottawa and nearby municipalities where off-site storage facilities may be located.

5. How We Protect Personal Information and What Safeguards We Use

The CAC uses appropriate physical, procedural, and technical security with respect to its offices and information storage facilities so as to minimize the possibility of loss, misuse, unauthorized access, disclosure, or modification of Personal Information. This also applies to our disposal or destruction of Personal Information.

Specially, this includes standard authorization and authentication measures to secure access to your personal information. The CAC also encrypts all incoming and outgoing information and credential data. We also maintain operational logs for security audits.

The CAC further protects Personal Information by restricting access to it to those employees that the management of the CAC has determined need to know that information in order that we may provide our products or services or information. If any employee of the CAC misuses Personal Information, this will be considered as a serious offence for which disciplinary action may be taken, up to and including termination of employment. If any individual or organization misuses Personal Information that is provided to the individual or organization for the purpose of providing services to or for the CAC, this will be considered a serious issue for which action may be taken, up to and including termination of any agreement between the CAC and that individual or organization.

6. Access to and Correction of Your Personal Information

The CAC permits the reasonable right of access and review of Personal Information held by us about an individual. You can contact us at any time at <u>coach@coach.ca</u> if you would like to change or update your Personal Information. To guard against fraudulent requests for access, we may require sufficient information to allow us to confirm that the person making the request is authorized to do so before granting access or making corrections.



In some cases, the CAC may not be able to provide you with access to your Personal Information, for example, where an exception to access is permitted or required by applicable law.

Where Personal Information will not or cannot be disclosed, the individual making the request will be provided with the reasons for non-disclosure.

The CAC reserves the right not to change any Personal Information in response to an amendment request from an individual but may append any alternative text the individual concerned proposes.

The CAC will not charge you for verifying or correcting your Personal Information, however, to the extent permitted by applicable law, there may be a minimal charge imposed if you need a copy of records containing Personal Information.

7. Legal Disclaimer

We may provide links to, or automatically produce search results for, third-party websites or resources, or third-party information referencing or linking to third-party websites or resources. CAC has no control over such third-party websites and resources, and you acknowledge and agree that CAC is not responsible for the content or information contained therein. When you follow such a link, you are no longer protected by our Policy, and we encourage you to read the privacy statements or other disclaimers of such other parties. CAC is not responsible for the privacy or security practices or the content of external websites, services or products.

8. Children

CAC recognizes the privacy interests of children, and we encourage parents and guardians to take an active role in their children's use of CAC's services. Where children under the age of thirteen (13) are accessing our services, written consent of the parent or guardian will be required. If you are between the ages of thirteen and fifteen (13-15), written consent of the child and parent or guardian will be required.

9. Your Choices with Respect to Collection, Use, and Disclosure of Your Personal Information

Websites and Opt-Out Functions

You can adjust and manage the privacy of your information via our website, which will allow you to opt out of certain services that we offer by adjusting your device or browser settings. You can also manage information by adjusting your personal profile.

Email

You can opt out of emails through the links in the emails that you receive from us.

Products and Services

All use of the CAC's products and services is subject to user consent. You can withdraw your consent at any time by unsubscribing from the product or service or discontinuing use.

Third Party Mailings or Advertisements

If you prefer to exclude your physical mailing address from third-party mailings or advertisements, you can contact us at any time at <u>communications@coach.ca.</u>

10. Openness and Challenging Compliance

The CAC will provide you with specific information about our policies and practices relating to the management of personal information, upon your request. For details regarding whom to contact regarding personal information collected by our organization, please see the Contact Information section below.

Challenging Compliance

The CAC has a Privacy Officer who will review and respond to all information requests or complaints regarding our privacy practices. In order to contact our Privacy Manager, please use the contact information set out below.

11. Changes to this Policy and How to Contact Us for More Information

We reserve the right to change our security and privacy practices at our discretion and as necessary due to technical developments and without any prior notice unless required by applicable law. By continuing to use our services, you agree to accept these changes. We suggest that you bookmark this page and periodically review this Privacy Policy to ensure familiarity with the most current version. Registered members will be notified of material changes to the Privacy Policy via email. This email will be sent to the address that you have provided to us.

Resolving Your Privacy Concerns

In the event of questions about: (i) access to your Personal Information; (ii) our collection, use, management or disclosure of Personal Information; or (iii) this Privacy Policy; please contact the CAC's privacy officer by sending an email to coach@coach.ca or calling 613-235-5000, ext 2365 and ask to speak with the CAC's Privacy Officer.

The CAC will investigate all complaints and, if a complaint is justified, we will take all reasonable steps to resolve the issue.

Review date:

Action approval date:

Review cycle: 1 year

