



POLICY

on

Personal Information Protection & Electronic Documents Act (PIPEDA)

Regulation

As of January 1, 2004, the federal government is enforcing the PIPEDA (Personal Information Protection & Electronic Documents Act). The Act regulates the collection, use and disclosure of personal information.

Swim Ontario, in essence, is asking its members to allow personal information such as name, address, date of birth, e-mail addresses, telephone numbers, etc., on their families to be entered electronically on a nation-wide database. Hard copy lists are also on file at the Swim Ontario office. They are kept in a secure location to which no one other than the Swim Ontario staff has access. The Executive Director is the appointed designate for overseeing the data collection process and is ultimately accountable for compliance with this policy.

Purpose of Information Collection

This information is necessary to allow our athletes to train and compete in an age appropriate environment, and to have personal information on hand when direct contact is necessary. The latter also applies to volunteers and coaches. Swim Ontario also collects donor information for Swim-A-Thon tax receipt purposes.

Security & Safeguards

The database (Metasport Systems/SwimDirect) is secure, and personal information is not accessible to the general public (see Appendix A). Each club's registrar has access to the database only as it pertains to club members. Swim Ontario, as the parent organization, can access personal information on all its registered members. Swimming Canada uses the database to determine total registration numbers, rankings, as well as meet results, for

the entire country. Passwords are mandatory for all identified groups to access required information.

Limited Use of Information

Personal information is not divulged to anyone without prior permission from the family. Occasionally, Swim Ontario provides family mailing addresses only to a bonded mailing house for the purpose of distributing specific information directly to athletes' homes. Swimming Canada also accesses the information for statistical and tracking purposes.

Meet managers need name and date of birth (DOB) for swimmers entering competitions. Names, ages, and event results are published electronically as well as in hard copy format after the conclusion of competitions. Other personal information is not made available at any time without prior contact with the coach or the parents/guardians of under-aged swimmers.

Consent & Withdrawal Thereof

Swim Ontario requires consent from each family to continue with this practice. Each club registrar should keep a signed consent form (see attached) on file for each registered member (athletes, volunteers, coaches, etc.) until such time at which a member wishes to withdraw consent or leaves the organization. **Withdrawal of consent for the use of personal information must be received immediately in writing by the Executive Director of Swim Ontario.**

Personal information is kept on file for the duration of a member's participation in Swim Ontario programmes. At the end of each season (August 31), the data is archived and will only be re-activated for those members who re-register with the association. After six (6) years, all outdated information will be purged entirely from the SwimDirect database. Hard copy lists are kept at the Swim Ontario office for a period of no more than two years, after which time they are destroyed.

Individual Access

Swim Ontario will be happy to provide registered individuals with personal data as it appears on the SwimDirect database within 30 days of receipt of a written request.

Complaints

Complaints are to be directed to the Executive Director of Swim Ontario who will attempt to remedy each situation as it arises expeditiously and in strict confidence.

**SECURITY OF DATA
(as per Metasport/SwimDirect Systems)**

- * Clubs must provide Provincial Section with an officially signed user id request form. There is one registrar per club authorized to use account/password combination.
- * All user id's are either expired or deleted on Aug 31 each year at the Provincial Section Office's (PSO) discretion.
- * SWIMON has chosen to remove a Club's affiliation until it has settled all outstanding invoices and fees, and has paid the upcoming season's club fee. The club cannot access its data until the club affiliation is valid.
- * The registration site is available only through PSO websites.
- * No meta-tags have been used in the HTML to facilitate search engine access.
- * SecureIIS Web site protection software from eEye Digital Security has prohibited unauthorized access. The site has avoided all "hacking" since its inception.
- * Website encryption will be added this year using a 128 bit encryption certificate. This will provide a foundation for financial transaction support, if that is required.
- * Site resides behind a router/firewall which only permits access to the web server via restricted ports. Although port 80, the public http protocol port, is open other ports are locked down to prevent "backdoor" access.
- * The database server on which the data resides, has no external (internet/web) exposure. It is not visible to the outside world and is only accessed via an internal onsite LAN or from the web/appserver. The IP associated with this server is within the range of private IP's – not addressable outside an internal LAN.

Metasport Systems



Personal Information Protection & Electronic Documents Act

CONSENT FORM

Swim Ontario's policy with regard to the PIPEDA is attached. Please read it and sign the consent area of this form.

I, _____, give permission to the _____ Club to enter required personal information on the SwimDirect database for the purposes outlined in Swim Ontario's policy, which I have read. I understand that I may withdraw consent at any time upon written notice to the Swim Ontario Executive Director, and my personal information will be purged from the database. Withdrawal constitutes de-registration. The club will be informed immediately upon receipt of the written notice..

Consent is given for _____ myself
_____ under-aged child(ren) – member(s) of the above club.

NAME _____ **Day Time telephone** (_____) _____
(please PRINT)

e-mail Address _____

SIGNATURE _____

DATE _____

This form is to be kept on file by the above club until such time when consent is withdrawn or the person/family ceases to be a member of Swim Ontario. When transferring to another club in Ontario, a new consent form must be completed and filed with the accepting club. "Unattached" persons are to send this form directly to the Swim Ontario office.