# Appendix "F"

**Privacy Policy** 



# CANADIAN AUTOMOBILE SPORT CLUBS ONTARIO REGION

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AMENDED TO THE CASC ONTARIO REGION MANUAL OF POLICIES APRIL 28, 2018

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# **PRIVACY POLICY**

Canadian Automobile Sport Clubs – Ontario Region (CASC-OR) respects and protects the privacy of its affiliated members and its member clubs.

The following privacy statement is an overview of how we collect and use your personal information. If you have questions please contact CASC-OR by email at office@casc.on.ca, or by telephone at 1-877-667-9505.

# ACCOUNTABILITY

CASC-OR is accountable to its member clubs, affiliated members and participants for the personal information under our control.

This accountability is overseen by a Privacy Officer, whose role is to

- ensure that CASC-OR implements privacy policies which adequately protect personal information
- review application of the policies to ensure their intended protection is realized
- investigate questions or concerns about the application of the privacy policy and institute corrective action when necessary

CASC-OR may use third parties for the processing of information.

When third parties are used, there will be a contract with the third party stipulating that the information will not be used for any purpose other than purpose for which it was originally collected by CASC-OR and that the information will be treated with a comparable level of protection to that which CASC-OR provides.

Information processed by third parties may be processed in countries other than Canada, and when being processed is subject to the laws and regulations of those countries.

# INFORMATION COLLECTED AND PURPOSES FOR COLLECTION

CASC-OR will collect the minimum of information required from the individuals described for the purposes identified;

# Affiliated Members

Affiliated members are those people that an affiliated club reports to CASC-OR to entitle those members to the benefits of affiliation.

CASC-OR collects business contact information about each affiliated member, either directly from the member or from the affiliated club.

This business contact information includes

- Name
- Address
- Email Address
- Telephone Numbers

This information is used to establish which specific individuals are affiliated and to contact those members during normal business activities which include

- Determining eligibility for licences (a person must be an active member of a CASC-OR affiliated club to hold a licence)
- Determining eligibility for participation in CASC-OR championships and award programs (a person must be an active member of a CASC-OR affiliated club to participate in a CASC-OR championship)
- · Contacting individuals to remind them of the expiry and renewal of club memberships and licences
- Contacting individuals to advise them of upcoming events in which they may wish to participate or special offers from CASC-OR (e.g. special pricing for early renewal of licences)
- Contacting individuals on behalf of third parties to advise them of offers by those third parties (e.g. a CASC-OR sponsor offers a discount on purchase of a product or service to affiliated members of CASC-OR)

# Licenced Members

Licenced members are those affiliated members who apply to CASC-OR for a licence to participate in motorsport activity authorized or sanctioned by CASC-OR as an official or competitor.

CASC-OR collects additional personal information from affiliated members who wish to be issued a licence

- Date of birth (a person must be of a certain age to hold a licence, and some licences have age specific requirements for assessment of the applicant's fitness to participate in the activity for which the licence is issued)
- Photograph (all CASC-OR licences are photo licences to validate that the person presenting a licence to participate in an activity is the person to whom the licence was issued)
- Annual waiver bearing a signature of the individual (CASC-OR licence holders must execute a waiver of liability for all events in which they participate to be issued a CASC-OR licence)

#### Medical Information

For certain levels of licence (e.g. road racing licence) a person must either

- undergo and submit a medical assessment by a qualified medical practitioner which validates their fitness for participation in certain types of events
- submit a medical self assessment declaring that they have had no changes in their health since their most recent assessment by a medical practitioner and continue to be fit for participation

This will only be required when participation in the activity is known to require levels of fitness for the protection of the individual participating as well as the protection of other participants.

The age of the person will be used to determine the frequency and type of assessments required.

Medical information provided and collected for purposes of establishing eligibility to be licensed to participate in a CASC-OR sanctioned event or activity will be retained and stored in a confidential manner, and shall be disclosed only as required to a physician chosen by CASC-OR for the express purpose of establishing the eligibility of the individual for licensing.

Medical information that is provided by an individual voluntarily for any other purpose shall be maintained and stored in a confidential manner, with access and disclosure restricted to a health care practitioner or practitioners for purposes consistent with the reasons and terms provided to the individual at the time of voluntary disclosure.

# Event Participants

Event participants are people who choose to participate in a CASC-OR sanctioned or authorized event. They may or may not be CASC-OR affiliated members.

Event participants agree, as a condition of their participation in the event, that they will provide the same business contact information collected about an affiliated member. They also agree that business contact information previously collected by CASC-OR for affiliated membership may be shared by CASC-OR with the event organizer upon request.

This information may be used to;

- Produce results for the event which may contain a person's partial or full name, city and province, and club memberships
- Provide identification information to authorities (police, fire department, paramedics or coroner) in the event the participant sustains or may have sustained a serious injury)

CASC-OR may collect information about vehicles used by participants in event as follows;

- Make, model, and other specifications of the vehicle to classify the vehicle for competition and identify the make and model of vehicle used in event results
- Logbook number and date of most recent inspection of a vehicle signifying it has received a technical inspection to validate its compliance with regulations
- Self inspection form where a participant warrants that they have inspected the vehicle they will use and determined it to be suitable for competition

CASC-OR and the organizers of events authorized or sanctioned by CASC-OR may collect additional personal information from any person, whether a CASC-OR affiliated member or a person entitled to participation on some other basis (e.g. licence holder from another recognized sanctioning body) who wishes to participate in an event as follows;

- Emergency contact name and phone number (in the event of an accident where a participant sustains or may have sustained an injury, this information is used to contact another person to aid the participant or direction to medical practitioners treating the participant)
- Possession of a current driver's licence (some CASC-OR authorized or sanctioned activities take
  place in public areas or on public roads, and therefore a person must hold and present a valid driver's
  licence to participate in the activity) it may be recorded that the person did present a valid driver's
  licence when registering for the event but <u>the information on the driver's licence will NOT be
  recorded or retained in any form.</u>

This information may not be collected for all types of events, but is required when it is requested.

# **Financial Information**

CASC-OR or its affiliated clubs may collect payment information from affiliated members or event participants in the following ways for the following purposes;

- A person may purchase a membership in a CASC-OR affiliated club through the CASC-OR website to receive the benefits of club membership and affiliation with CASC-OR
- An affiliated member may, through the CASC-OR website or using a paper or electronic form, purchase a CASC-OR licence to participate in CASC-OR sanctioned or authorized events as well as those organized under other sanctioning bodies
- An event participant may purchase an entry into an event through the CASC-OR website or through a third party whom CASC-OR has contracted for processing of event entries

Payment information will only be used for processing of payments and will not be retained. If the information is received by paper or electronic form, the information will be destroyed/deleted once the payment has been processed.

#### **Additional Information**

Additional information may be requested from time to time. If additional information is requested, the reason for its collection shall be stated at the time of collection and it may not be required for purposes of affiliation, licencing, or participation.

#### CONSENT

When affiliating with CASC-OR through one of its member clubs (either through CASC-OR facilities or through the member club), by utilizing any of its services, or by participation in events sanctioned or authorized by CASC-OR, affiliated members or other parties expressly consent to our use of your personal information in accordance with this Privacy Policy.

Where information is required to be provided for the individual to access or use services of the business, or to participate in its lawful activities, the individual can decline to provide the required information by choosing not to become an affiliated member, choosing not to apply for a licence, or choosing not to participate in the activity.

Once a person has become an affiliated member, applied for a licence, or chosen to participate in an event consent may not be withdrawn.

CASC-OR may in the course of its activities ask permission of its affiliated members to deliver them information on behalf of member clubs or third party advertisers. Such permission must be granted explicitly by the affiliated member on a "opt-in" basis (the default being the member will not receive such information).

CASC-OR may in the course of its activities ask permission of its affiliated members to share specific limited personal information with third parties so they may deliver information to the member (e.g. name and address for the delivery of a free magazine). Such permission must be granted explicitly by the affiliated member on a "opt-in" basis (the default being the member will not receive such information).

Individuals may withdraw "opt-in" consent at any time.

# LIMITED USE AND DISCLOSURE

Information collected will only be used for the express purpose for which it was collected and no other purpose unless we request and receive your specific consent to use it for some other specific purpose.

We will not disclose your personal information to third parties except with your "opt-in" consent as provided above.

Aggregate and non-identifiable information may be provided to third parties in furtherance of CASC-OR's business goals and interests, including to advertisers, media and third party promoters or research services.

CASC-OR will cooperate at all times with law enforcement inquiries and other agencies in accordance with applicable legislation and/or as may be legally required in the course of investigation, enforcement or prosecution.

# ACCURACY

Many of the purposes for which we collect personal information about affiliated members require it to be accurate, complete and up-to-date to satisfy the intended uses. We may reach out to affiliated members from time to time asking them to validate or update their personal information so it satisfies the purpose for which it is collected.

#### SAFEGUARDS

Information collected by CASC-OR or its member clubs in the course of its/their activities must be stored securely to avoid breaches of privacy.

Policies and procedures will be in place in the CASC-OR offices for the secure retention and destruction of printed materials bearing personal information.

Systems used for the collection and storage of personal information shall be configured to industry standards for the protection of information and shall be updated on a regular basis to ensure their security against new threats. Where possible, intrusion testing should be undertaken to probe for any vulnerabilities in the systems / websites.

Access to stored personal information must be protected by authentication, with the information only available to the affiliated member, the club(s) to which they belong, and to CASC-OR administrative staff in the execution of their responsibilities.

# TRANSPARENCY

CASC-OR will make this policy available at all times to all affiliated members, either by visiting the CASC-OR public website at http://www.casc.on.ca or by requesting a written copy of this Privacy Policy from the CASC-OR office.

Affiliated members or other interested parties may request clarification of these policies or specific information about how these policies are being applied in practice from the CASC-OR Privacy Officer at any time and will receive a response within a reasonable and appropriate timeframe.

# INDIVIDUAL ACCESS

Any affiliated member or other interested party may inquire to the Privacy Officer about the existence, use, and disclosure if any of their personal information at any time. This inquiry shall be answered within a reasonable and appropriate timeframe.

An individual may request a copy of their personal information currently retained by CASC-OR. This information will be provided in electronic or printed form, whichever is preferred by the individual.

An individual may question the accuracy of the information and have it amended as appropriate.

# CHALLENGING COMPLIANCE

The Privacy Policies of CASC-OR are intended to comply with the principles of PIPEDA.

Questions regarding the privacy policy of CASC-OR should be directed to the CASC Office Administrator by email (<u>office@casc.on.ca</u>). Those questions will be forwarded to and receive a written response from the Privacy Officer.

Questions or concerns regarding the application of the privacy policy in specific situations should be directed to the CASC-OR Board Of Directors (<u>directors@casc.on.ca</u>). The situation will be brought to the attention of and investigated by the Privacy Officer who will respond to the concerns in writing.

If the person raising the question or concern is not satisfied with the response they may then request that the Board Of Directors consider the matter and respond.

If the person is still unsatisfied with the response, they may file a formal complaint with the Office of the Privacy Commissioner of Canada.

# AMENDMENTS TO THE POLICY

CASC-OR reserves its right to amend this Privacy Policy at any time by posting the amended policy on its public website. Once posted, all amendments have immediate effect but are not retroactive.