

# **Privacy Policy**

## **Purpose**

- 1. The privacy of our members, players, volunteers, and supporters is very important to TCU. This Privacy Policy explains how TCU collects, uses, and protects personal information in compliance with the British Columbia Personal Information Protection Act ("PIPA"). If any part of this policy conflicts with PIPA, the provisions of PIPA will take precedence.
- 2. This policy applies to personal information about players, parents/guardians, coaches, officials, volunteers, directors, and fans involved with TCU programs and activities. A separate policy governs personal information about TCU employees.

#### **Personal Information**

3. Personal information is any information about an identifiable individual, such as name, contact details, age, health information, performance data, opinions, or background. Business contact details are excluded from personal information under PIPA.

### **Accountability**

4. TCU's Privacy Officer is responsible for managing personal information and ensuring all staff receive privacy training. The Privacy Officer handles requests for access to information and complaints.

## **Purposes for Collecting and Using Personal Information**

- 5. TCU collects and uses personal information only to support our soccer programs and activities, including but not limited to:
- Player and volunteer registration, communication, and emergency contact
- Coaching and official certification and selection
- Insurance and claims management
- Travel arrangements and equipment purchases
- Determining player eligibility, age groups, and competition levels
- Awards nominations and media relations
- Uniform outfitting and team management
- Video and photo recordings for training, promotion, and media purposes
- Discipline and safety notifications
- Volunteer screening including criminal record checks

- Marketing and demographic analysis to improve programs
- Communication within the club and with partner organizations
- 6. TCU is affiliated with local soccer associations and governing bodies, and discloses information to these organizations as required by their rules or funding requirements.
- 7. When TCU needs to use personal information for a new purpose not covered here, we will seek consent from the individuals involved.

#### **Indirect Collection**

8. Sometimes personal information is collected indirectly from affiliated clubs, leagues, or competition organizers. TCU relies on these partners to collect and provide accurate information lawfully.

#### Consent

- 9. TCU obtains consent from individuals when collecting personal information directly or prior to using or sharing it for new purposes.
- 10. In some cases, TCU may use personal information without consent where permitted by law, such as:
- Observations at public sporting events
- Eligibility checks for awards or rankings
- Medical emergencies when consent cannot be obtained
- Situations clearly in the best interest of the individual
- 11. By participating in TCU programs, individuals are deemed to have consented to this Privacy Policy.
- 12. TCU will not require consent beyond what is necessary to provide a product or service.
- 13. Individuals may withdraw consent at any time, but this may affect their ability to participate in TCU activities.

# **Limiting Collection**

14. TCU collects personal information fairly, lawfully, and only for the purposes described here.

## Limiting Use, Disclosure, and Retention

- 15. Personal information will only be used or shared for the purposes for which it was collected, unless consented to otherwise or required by law.
- 16. Personal information will be kept for at least one year after it is last used, then securely destroyed or anonymized following TCU's records management policies and legal requirements.

### Accuracy

17. TCU works to ensure personal information is accurate and current. We rely on partners like leagues and officials to provide accurate data.

# Safeguards

18. TCU protects personal information with reasonable security measures appropriate to the sensitivity of the data, including physical, technical, and administrative safeguards such as locked storage, password protection, and restricted access.

# **Openness**

- 19. TCU will provide information about its privacy policies and practices on its website.
- 20. Publicly available information includes:
- Contact details to forward concerns or questions
- How individuals can access and update their information
- Copy of TCU's Privacy Policy

#### **Individual Access**

- 21. Individuals may request access to their personal information held by TCU by submitting a written request.
- 22. Requests will be fulfilled within 30 days at minimal or no cost unless an extension is iustified.
- 23. If fees are required, TCU will provide an estimate in advance.
- 24. Individuals may request corrections to their personal information. If corrections are refused, a note of the requested correction will be attached.
- 25. Access may be denied if:
- The cost is prohibitive
- The information refers to others
- Disclosure is prohibited by law or privacy privileges apply
- 26. Reasons for denial will be provided in writing.

#### **Complaints and Compliance**

- 27. Individuals may forward concerns regarding TCU's privacy practices by an email to info@tcufc.ca.
- 28. Complaints will be recorded, acknowledged, and investigated promptly. The Privacy Officer will seek to resolve complaints informally or by appointing an investigator if needed. Outcomes will be communicated within 60 days.
- 29. Complaints can also be directed to the BC Information and Privacy Commissioner (<a href="www.oipc.bc.ca">www.oipc.bc.ca</a>).

# **Changes to the Policy**

30. TCU may update this Privacy Policy at any time without notice. The latest version will be available on the TCU website.