

## **JW SPORTA LIMITED**

### **PUBLIC INFORMATION ON PRIVACY**

#### **Purpose**

1. Privacy of personal information is governed by the *Personal Information Protection Act* (“PIPA”). JW Sporta’s Privacy Policy describes the way that JW Sporta collects, uses, and discloses personal information and states JW Sporta’s commitment to collecting, using and disclosing personal information responsibly. JW Sporta’s Privacy Policy is based on the standards required by PIPA, and JW Sporta’s interpretation of these responsibilities.
2. A copy of JW Sporta’s Privacy Policy is available upon request to JW Sporta.

#### **Personal Information**

3. 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).

#### **Accountability**

4. The Privacy Officer of JW Sporta 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 Privacy Officer also handles personal information access requests and complaints. The Privacy Officer may be contacted at the following address:

JW Sporta  
C/O Privacy Officer  
#228-1367 West Broadway  
Vancouver, British Columbia V6H 4A9

Tel: 604-738-2468  
Email: [psap@jwsporta.ca](mailto:psap@jwsporta.ca)

#### **Purpose**

5. Personal information will only be collected by JW Sporta to meet and maintain the highest standard of organizing and programming. JW Sporta collects personal information from customers, clients, participants and volunteers for purposes that include, but are not limited to, the following:
  - a) Name, address, phone number, cell phone number, fax number and e-mail address for the purpose of receiving communications from JW Sporta.
  - b) Credit card information for registrations and purchasing equipment, manuals and other resources.
  - c) Banking information, social insurance number, criminal records check, resume, and beneficiaries for JW Sporta’s payroll, company insurance, health plan and screening and hiring practices.
  - d) Personal health information including provincial health card numbers, allergies, emergency contact and past medical history for use in the case of medical emergency.
  - e) Marketing information including attitudinal and demographic data to determine demographic structure, and program wants and needs.
6. If a purpose has not been identified herein, JW Sporta 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.

#### **Consent**

7. JW Sporta will obtain consent by lawful means from individuals at the time of collection, prior to the use or disclosure of the personal information. If the consent to the collection, use or disclosure was not obtained upon

receipt of the information, consent will be obtained prior to the use or disclosure of that information. JW Sporta may collect personal information without consent where reasonable to do so and where permitted by law.

8. JW Sporta will not, as a condition of a product or service, require an individual to consent to the collection, use or disclosure of information beyond that required to fulfill the specified purpose of the collection of the information.
9. 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 completes an opt out request form. The Privacy Officer will advise the individual of the implications of such withdrawal.

### **Limiting Use, Disclosure and Retention**

10. Personal information will not be used or disclosed by JW Sporta 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.
11. Information disclosed to a third party with consent from the individual will be protected by a third party agreement to limit use and disclosure.
12. Personal information will be retained for certain periods of time in accordance with the following:
  - a) Client information will be retained for a period of three years after a client is no longer associated with JW Sporta in the event the client chooses to re-associate with JW Sporta;
  - b) Employee information will be retained for a period of seven years in accordance with Canada Customs and Revenue Agency requirements.
  - c) Personal health information will be immediately destroyed at the time the individual is no longer involved with JW Sporta.
  - d) Credit Card information will be destroyed immediately upon completion of a financial transaction.
  - e) Marketing information will be immediately destroyed upon compilation and analysis of collected information.
  - f) As otherwise may be stipulated in federal or provincial legislation.
13. Personal information that is used to make a decision about an individual will be maintained for a minimum of one year of time to allow the individual access to the information after the decision has been made.
14. JW Sporta may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where JW Sporta 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.
15. Documents will be destroyed by way of shredding and electronic files will be deleted in their entirety. When hardware is discarded, JW Sporta will ensure that the hard drive is physically destroyed.

### **Accuracy**

16. JW Sporta 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**

17. Personal information is protected by security safeguards appropriate to the sensitivity of the information against loss or theft, unauthorized access, disclosure, copying, use or modification.
18. 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.
19. 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.
- d) Electronic information is transmitted either through a direct line or is encrypted.
- 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 JW Sporta with appropriate privacy assurances.

### **Openness**

- 20. JW Sporta will publicize information about its policies and practices relating to the management of personal information. This information is available through JW Sporta's web site or upon request by contacting JW Sporta's Privacy Officer.
- 21. The information available to the public includes:
  - a) The name or title, address and telephone number of JW Sporta's Privacy Officer;
  - b) The forms that may be used to access personal information or change information;
  - c) A description of the type of personal information held by JW Sporta, including a general statement of its approved uses;
  - d) a copy of any materials or other information that explain the organization's privacy policies; and
  - e) organizations in which personal information is made available.

### **Individual Access**

- 22. Upon written request, and with assistance from JW Sporta, 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.
- 23. 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.
- 24. If personal information is inaccurate or incomplete, it will be amended as required.
- 25. 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.
- 26. Upon refusal, JW Sporta will inform the individual the reasons for the refusal.

### **Challenging Compliance**

- 27. An individual may challenge JW Sporta's compliance with PIPA, by submitting a challenge in writing.
- 28. Upon receipt of a written complaint, JW Sporta will:
  - a) Record the date the complaint is received;
  - b) Notify the Privacy Officer 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 days of receipt of the complaint;

- d) Appoint an investigator using JW Sporta 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 days of receipt of the complaint.
- e) Upon completion of the investigation and within 25 days of receipt of the complaint, the investigator will submit a written report to JW Sporta.
- 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 days of receipt of the complaint.

### **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."

JW Sporta 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.

JW Sporta does not use cookies to identify specific individuals.

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### **Applicable Law**

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