SKATE CANADA PRIVACY CODE

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Policy Owner: Chief Executive Officer

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Introduction – Our Commitment to Privacy

The Skate Canada Privacy Code (the "Code" and/or "Privacy Code") pertains to the protection of personal information collected by Skate Canada as part of our interactions with you. Skate Canada is committed to protecting your privacy whether you are browsing for information or conducting business with Skate Canada. The handling of all personal information is governed by the Personal Information Protection and Electronic Documents Act (the Act or PIPEDA)[1].

Your privacy is important to us: At Skate Canada, protecting the privacy and confidentiality of the personal information entrusted to us is very important and an integral part of our commitment to excellence. To help us meet this commitment, Skate Canada has appointed a Privacy Officer to oversee Skate Canada's privacy practices.

You have choices**:** In an era in which technology increasingly facilitates the circulation and exchange of information, we encourage you to read this Privacy Code so that you understand how we collect, use, share, and protect your personal information and how you can manage your information in a way that suits you.

About this Privacy Code

This Privacy Code works collectively with our Online Terms of Use. This Privacy Code applies to the collection, use and disclosure of any confidential information, including personal information, collected by Skate Canada in the course of conducting business with us (which includes when you are accessing or using Skate Canada programs and services (including attending and/or online streaming of events/competitions), using our website or mobile application, and otherwise interact with us). It will continue to apply for as long as Skate Canada holds your information, including after the termination of a program or service agreements or arrangements with us. By providing us with your confidential information, you are consenting to the collection, use, or sharing of your information for the purposes as set out in this Code.

[1] British Columbia, Alberta and Quebec privacy legislation has been deemed substantially similar to PIPEDA and therefore follow their respective provincial privacy legislation.

To Whom does this Privacy Code Apply

This Privacy Code applies to Skate Canada in respect of confidential information that Skate Canada collects, uses, or discloses from individual(s) for the operation of its business and/or in the course of its organizational activities.

When a person registers with a club or skating school, they will also be registered with Skate Canada. This means that Skate Canada may collect, use, disclose and maintain their confidential information for certain purposes described in this Privacy Code and as required to establish, register, administer, and maintain their relationship with us. This applies to registrants, coaches and/or in connection with their affiliation with a skating club or skating school. Their confidential information may also be exchanged with Skate Canada affiliates which includes their local skating club or school or provincial association or section.

All individuals at one time or another may receive personal, privileged and/or confidential information which may concern other individuals. Individuals are obligated to ensure that confidential information to which they may have access remains confidential, is only used for the purposes for which it was collected is not disclosed without authorization or used for personal gain. Any individual who discloses confidential information, contrary to this Privacy Code will be subject to disciplinary measures.

Individuals are required to follow the Skate Canada Privacy Code as outlined herein, which is designed to comply with PIPEDA, regarding the collection, use and disclosure of confidential information.

> ***Important Note** – for the privacy policies of your club / skating school, please direct any questions directly to your club / skating school using the process that they describe on their website or in their privacy policy.

Guiding Principles of this Privacy Code

Skate Canada is accountable to those whose confidential information comes under its custody for ensuring that their information is protected in a manner consistent with this policy. Accountability for Skate Canada's compliance with this Privacy Code rests with the Privacy Officer, or delegate.

Skate Canada is responsible for confidential information in its possession or custody, including information that has been transferred to or is accessed by a third-party service provider for processing. Skate Canada uses contractual or other means to provide a comparable level of protection while a third party is processing the information.

Skate Canada has implemented policies and procedures to give effect to the principles of the Act, including:

- procedures to protect confidential information;
- procedures to receive and respond to inquiries and complaints; and
- training staff and communicating information to staff about Skate Canada's policies and procedures.

Collection, Use, Disclosure, and Retention

Skate Canada will identify the purpose for which it collects, uses, and discloses confidential information prior to collecting the information. Skate Canada only collects, uses, or discloses confidential information for purposes consistent with meeting its mandate and core functions.

This Privacy Code explains our current practices regarding what information Skate Canada may collect, use, disclose and retain during the course of your relationship with us.

Collection

Skate Canada limits the collection of confidential / personal information to that which is authorized and/or authorized by law, and/or where it is necessary for the purposes it has identified, such as to provide you with a program and/or service you request or use, to ensure the health and safety of individuals, and any applicable legal and regulatory obligations.

Confidential / personal information will be collected by Skate Canada through fair and lawful means from the individual (e.g., through membership, registration through your club or skating school), use of our programs and services, communications with us and/or third parties (e.g., by telephone, use of our website, accessing/streaming online Skate Canada events/competitions, email, third-party services (email, phone, website, applications), Sport Integrity Canada as part of the CADP, external authorities for the Skate-Safe and Canadian Safe Sport Program, including case management reporting systems, Case Manager, Sport Integrity Canada, legal counsel, investigators, etc.) and the Skate Canada Safe Sport program, etc.)). Skate Canada will not collect confidential information indiscriminately or in a misleading manner.

What kind of information do we collect?

The type of information including personal information we collect depends on various factors and the medium in which you interact with Skate Canada, such as the program or services you request or use, and any applicable legal or regulatory obligations. This information includes but is not limited to:

- **Contact information** such as name, address, telephone number, email or other electronic communication address, social media account and facsimile number

- **Identifiable information** such as age, demographics (as applicable), government issued identification when required

- **Financial information** as part of payment details for a product or service your request as applicable

- **Login information** when you login to Skate Canada IT owned resources (e.g., member portal)

- **Digital information** when you browse or download information from the Skate Canada website and use our applications, as our servers and that of our third-party service providers automatically collect limited amounts of standard information about your device and usage/activity of our applications and website to deliver our programs and services, improve your experience, and for traffic monitoring and statistical purposes. For example cookies, including but not limited to the following

    - your internet protocol (IP) address of the computer you are using to access our site (a number identifying your device or router on the internet), as well as your internet service provider and sometimes your location, and your operating system (MAC OS, iOS, Windows, Android, etc.) which is not stored or retained in a format that can be used to identify you. Your location information is important to help us provide features like search results for clubs and skating schools near you based on your location
    - operating systems and the types of versions of browsers used to access our site (including but not limited to Google, Google Play, Firefox, Internet Explorer, Safari, etc.)
    - dates and times you access our site

- **Personal Health Information** as part of our Safe Sport program and processes. For example, including but not limited to, the reporting and management of incidents of injury, reporting and resolution of Skate-Safe reports, reporting and resolution of Safe Sport reports, anti-doping, etc.), in the management of events/competitions, as may be required, travel management, and medical emergencies

How do we collection information?

We may collect information from you both directly and indirectly, with much of the information coming from you directly. For example,

- at time of registration with your club/skating school for a Skate Canada program and/or service. Note: For the collection of identifiable confidential information for registration, a Notice of Collection statement and consent must be completed by the registrants at time of registration with a member (club, skating school) (See Appendix for the "Notice of Collection").
- use of our programs and services (e.g., assessment results, qualifications, etc.)
- at time of application to be an event volunteer at a Skate Canada event/competition for (e.g., training, education, work experience, volunteer experience, qualifications, etc.)
- correspondence or communications with us that may be monitored or recorded, such as telephone calls, video conferencing, electronic communications, online chats, or other interactions with Skate Canada's website
- completion of forms
- purchases of Skate Canada merchandise, etc.
- interactions with us online, including through our social media website
- use of our website
- subscribing to Skate Canada publications (e.g., e-news, newsletters, etc.)
- surveys
- attending skating events / competitions hosted by Skate Canada
- online streaming of skating events / competitions hosted by Skate Canada
- visiting our Skate Canada Ottawa Service Centre
- other public and/ or permitted sources
- interactions with third party service providers (such as but not limited to the Skate-Safe program, the Sport Integrity Canada Canadian Safe Sport Program, and the Sport Integrity Canada Canadian Anti-Doping Program in the context of the investigation, as applicable, and resolution processes as part of the Skate Canada National Safe Sport Programs, and the management of incidents of injury)
- regulatory and legal authorities, other organizations with whom Skate Canada has dealings, such as government agencies, publicly available records

Use and Disclosure

Use – How we use information

Skate Canada will not use identifiable confidential information for purposes other than those identified prior to collection, except with the consent of the individual or as required by law. “Use” includes processing identifiable information in such a way that it is no longer identifiable (e.g., aggregated).

Skate Canada will use your identifiable confidential information as set out below in the section entitled “Identifying Purposes”.

Skate Canada allows only authorized staff to access and use specific data holdings of confidential information on a “need-to-know” basis, that is, when required to perform their duties.

Skate Canada sometimes uses the services of third-party service providers only to the extent required for the provision of such services. By providing confidential information, an individual consents to the access and/or transfer, storing or processing of their confidential information to a third-party service provider as applicable. Third-party service providers and contractors are contractually obligated to ensure data is treated securely and in accordance with this Privacy Code, to keep the information confidential, to use the information only for the purpose requested and to destroy the information when it is no longer required.

Disclosure – How and when we disclose information

Skate Canada does not sell, share, or lease confidential information to a third-party service provider or others for any other purpose from what is disclosed in this Policy without the consent of the individual.

Skate Canada may disclose or publish non-identifiable (e.g., aggregated) confidential information only, having used reasonable precautions to ensure that individuals cannot foreseeably be identified by linking this information with other information.

Skate Canada may disclose identifiable confidential information only when:

- the recipient is the data provider that originally provided the identifiable confidential information; or
- disclosure is required by law;

- disclosure is required as part of the Skate Canada National Safe Sport program, including external authorities designated by Skate Canada for reporting and complaint management (e.g., Skate-Safe program Case Manager, the Sport Integrity Canada Canadian Safe Sport Program), insurance, injuries management, external legal counsel, external investigators, etc.);
- disclosure is required to support funding, team selection, etc. For example, with Sport Canada, ISU, COC, etc.;
- consent has been obtained from the individual(s) concerned.

Identifying Purposes – Specific ways we collect, use, and disclose information

Skate Canada collects, uses, or discloses confidential information for the following purposes, including but not limited to:

Non-commercial activity:

a. For registration and delivery of Skate Canada programs, services, competitions, events, and activities
b. For registration and attendance at national and/or international competitions, as applicable (e.g., ISU, COC, etc.)
c. To establish and authenticate your identity
d. To confirm our discussions with you
e. For quality assurance and monitoring to enhance and maintain member service quality (e.g., call recording of calls to Member Services)
f. For technical monitoring, coaches training, officials training, sport promotion and media publications
g. To determine eligibility, age group and appropriate level of competition
h. To determinate registrant and membership demographics and program wants and needs
i. To provide you with features such as search results for clubs/skating schools that are near you based on your location
j. To comply as required by law and industry requirements, including regulatory, Sport Integrity Canada as part of the CADP and CSSP, Sport Canada, COC, and ISU
k. To comply with obligations with respect to Skate Canada's Safe Sport program (for example, external authorities designated by Skate Canada for Safe Sport to receive reports of alleged, suspected, or actual misconduct who operate at arm's length to the organization , external legal counsel, external investigators, third-party insurance provider) balancing privacy, confidentiality and fairness regarding reporting and resolution management

l. To comply with obligations with respect to third-party service provider requirements who assist Skate Canada in servicing members or registrants, and for this Code sections (for example,, third-party insurance provider(s), complaints of misconduct, anti-doping program, incidents of injury, etc.)
m. To communicate with you
    - sending communications to you by postal mail, email, text message, telephone, fax, other communication channels such as social media, including but not limited to:
        - sending e-news or a newsletter with content related to Skate Canada programs, events, competitions, fundraising activities, and other pertinent information, including related ads and offers (*please note that you can "unsubscribe" to Skate Canada newsletters by clicking the unsubscribe link at the bottom of any of the newsletters)
        - publishing articles, media relations and postings on the website, displays or posters
        - awareness nominations, biographies, and media relations
        - regarding incidents of injury, complaints of misconduct, complaints of Code of Ethics, general disputes, discipline, and appeals
        - regarding immediate temporary suspension of membership or status as a registrant pending the outcome of the investigation and disciplinary process
        - discipline results and long-term suspension list
        - checking residency status
n. To inform governing bodies (e.g., sections, ISU)) of a registrant and/or members registration and/or participation with Skate Canada
o. To inform government funders the number and demographic profile of registrants and/or members
p. To provide the educational tools and resources to pursue the highest levels of achievement
q. For purposes necessary to provide the safest possible environment, including advising other persons or organizations, including but not limited to, national (domestic and/or international, as applicable) and provincial sport organizations, sections, clubs, skating schools, Sport Canada, Sport Integrity Canada, SDRCC, ISU, COC, etc., etc., of any decisions, as applicable, rendered in accordance with the Skate Canada's National Safe Sport Program and supporting policies and procedures (e.g., Anti-Doping Policy; Misconduct Reporting and Resolution Policy and accompanying procedure. This may also include being advised by an external authority (Skate-Safe Case Manager

and/or Sport Integrity Canada) of the name of a respondent in the case of a report against them, and that of the complainant if reasonably necessary to protect that individual or other individuals

r. To support the resolution of general disputes in accordance with the General Disputes Resolution Policy and accompanying procedure
s. Decisions, including disciplinary measures as may be applicable, resulting from a complaint of misconduct (which includes those rendered by an external authority), general dispute, doping violation, and/or the Code of Ethics are maintained in a database or registry in a manner determined by Skate Canada, which may include being publicly available. Names of individuals disciplined may be disclosed as determined by Skate Canada to the extent necessary to give effect to the discipline/sanction process
t. To understand and better manage our business and development of programs and services (e.g., develop programs, services, and activities; market research or analytics of data we hold about you, including with our business partners)
u. To run our business, including but not limited to meeting tax, legal, accounting, and regulatory obligations
v. To third-party service providers to perform services on our behalf (including cloud or hosting service providers)
w. Personalize your experience with us through data analytics or otherwise including reviewing and analyzing your programs and services, your needs, wants and satisfaction level. This would be done through de-identifying or anonymizing your information by removing identifiable information such as your name, address, date of birth, etc., and such information may be aggregated with information and used for the purposes outlined
x. To manage property and facilities, ensure environmental compliance and perform risk management. (e.g., surveillance, monitoring, including video recording, in and around Skate Canada Ottawa Service Centre to maintain the safety of our employees, customers and others; protect against illegal activity, such as theft and vandalism; to ensure the health and safety of employees; and enhance and maintain client service quality)
y. To protect us or where permitted by law, including protecting our rights or interests, to ensure the health and safety of individuals, comply with legal and regulatory obligations, including demands or requests from governments, regulators, courts, and law enforcement authorities. We may also collect, use, or share information without consent where required by law

Commercial Activity:

a. Video recording and photography for promotional use, marketing, and advertising by Skate Canada
b. Promotion and sale of merchandise
c. Relevant ads and offers on our applications and websites
d. Promotion and offers, including tickets for skating events / competitions based on your location information and/or in general on our applications and websites

General:

a. Travel arrangements and administration, including requests for personal health information, as applicable
b. Medical emergency, reports relating to medical or emergency issues
c. Any and all complaints of misconduct, incidents of injury, ethical concerns, and doping reports, as per the policies under the Skate Canada National Safe Sport Program – including but not limited to Misconduct Reporting and Resolution Policy, Incidents of Injury Reporting and Management Policy, Anti-Doping Policy and Code of Ethics
d. Any and all inquiries

Skate Canada collects or may collect confidential information from individuals during the normal activities and for member and registrant management.

Retention

We apply a general rule of keeping personal information for as long as it is required to fulfil the purpose for which it was collected. In some circumstances, however, the length of time we keep your information will vary depending on the program or service and the type of information we have and our legal obligations to do so. We keep your information as long as long as is reasonably necessary for member service, legal or reasonable business purposes. For these reasons, we keep your information beyond the end of your relationship with Skate Canada. Legal requirements, tax and accounting obligations, complaints of misconduct, and/or long-term analysis and reporting may necessitate our retaining some or all of your confidential information for a period of time that is longer than we might otherwise hold it, up to and including indefinitely in certain limited circumstances.

In certain circumstances, we may also retain personal information for longer periods of time, which my correspond to a statute of limitations, so that we have an accurate record of your dealings with us in the event of complaints or challenges.

Minors (Child / Youth)

Skate Canada recognizes the importance of safeguarding the privacy of children. We take our responsibilities seriously with respect to our minor skaters / athletes of our programs and services. In addition to the steps that we take to safeguard the privacy and integrity of personal information of a minor as submitted by parents / legal guardians, we adhere to the following principles and practices regarding personal information of a minor:

- Skate Canada will not knowingly collect personal information from a minor without the consent of their parent / guardian
- Skate Canada will not knowingly market to a minor. If we learn that personal information of a minor was used for marketing purposes, we will take reasonable measures to delete them from all marketing campaigns
- Skate Canada's official website is not intended for children under the age of 14. By using the Skate Canada official website, a minor represents that they are 14 or over and that their parent or guardian has consented to minor's use of the Skate Canada official website.

It is important to note that complaints may be reported by a minor through our Safe Sport and/or our Skate-Safe process depending on the nature of the situation (e.g., Code of Ethics, Misconduct Reporting and Resolution Policy and supporting procedure). A minor may be required to have a parent/guardian or other adult serve as their representative during the processes as set out in the Code of Ethics and the Misconduct Reporting and Resolution Policy and supporting procedure. For clarity, a complaint report will not be rejected on the sole basis that it was submitted by a minor and not by a parent/guardian.

Safeguards – How we protect your information

Skate Canada makes every reasonable effort to protects confidential information with security safeguards to protect against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Skate Canada will protect confidential information that it holds or transmits regardless of the format in which it is held.

The nature of the safeguards will vary depending on the sensitivity and identifying nature of the information that has been collected, amount, distribution, and format of the information, and method of storage.

The methods of protection used include:

- physical measures, such as locked filing cabinets
- organizational measures, such as limiting access on a 'need to know' basis
- technological measures, such as the use of passwords, security solutions and encryption protocols

We regularly access our security measures to ensure that they remain effective and appropriate. Only employees who have a legitimate business need will be granted access to your information.

Where is your information stored?

Skate Canada uses cloud-based technology and relies on data centers that are primarily based in Canada. However, information may be stored and processed in any country where we have third-party service providers. Skate Canada third-party service providers, with whom we share information under this Privacy Code, may perform activities outside of Canada. As a result, your information may be securely used, stored, or accessed in other countries and be subject to the laws of those countries. By using our programs and services, you consent to the transfer of confidential/personal information to countries outside of Canada — including the United States — which may provide for different data protection rules.

In addition, depending on the nature of the information, your information may be stored in various computer systems or in record storage facilities of Skate Canada or our third-party service providers.

Your privacy choices

Subject to legal, security, business, or contractual requirements, individuals with a direct relationship with Skate Canada may withdraw their consent to our collection, use or disclosure of information at any time by contacting Skate Canada. However, withdrawing your consent may limit or prevent us from providing or continuing to provide you with specific programs or services.

To withdraw your consent, you can contact our Skate Canada Privacy Office to obtain the necessary form as follows:

Email: privacy@skatecanada.ca
Write to:

Skate Canada Privacy Officer
800-333 Preston Street
Ottawa, ON K1S 5N4

Withdrawal of consent does not have a retroactive effect, and your personal information may continue to be used or disclosed for purposes that have not been withdrawn, or where required for membership, for security reasons, or as required by law without consent.

In addition, it is important to note that although individuals have the right to withdraw consent at any time for the purposes as outlined below, a request for withdrawal will not terminate an ongoing process under the Skate Canada Safe Sport program and/or under the external authorities of our Skate-Safe program and the Canadian Safe Sport Program.

Marketing

Canada's Anti-Spam Legislation (CASL) is a Canadian federal law that governs Canada businesses or organizations using email, text messaging or social networks to promote programs, activities, events, competitions, and/or services.

Subject to applicable law, from time-to-time Skate Canada may offer you programs or services of Skate Canada and select third-parties or for other promotional purposes, which may be of interest to you. Your consent to receive marketing communications is optional and you can decide to withdraw at any time. However, this will not limit the information provided to you through communications such as electronic messages on our website or information we send you that is related to your existing programs or services or is permitted or required by law. We may also, from time to time, communicate with you to ask whether you wish to update your marketing preferences to help ensure our records are up-to-date and reflect your current preferences.

Call recording

Telephone calls with Skate Canada may be recorded and monitored for coaching, training, quality, and security purposes. If you do not wish to have your telephone call recorded, you may opt out by ending the call and contacting us through email or postal mail.

Accuracy – Keeping your information updated

We will make every reasonable effort to keep information in our records as accurate, complete and up to date as necessary for the purposes for which it is to be used.

However, Skate Canada does not routinely update confidential information, only when necessary to fulfill the purposes for which the information was collected.

Individuals are responsible for ensuring the confidential information they provide to Skate Canada is accurate, complete and up to date for the purpose specified, and encouraged to provide updates to us as changes occur.

To update your confidential information with Skate Canada, contact one of our representatives through our Member Services division by calling 1 (888) 747-2372

Accessing your information

Upon written request through our Member Services division (a form can be provided), Skate Canada will inform an individual of the existence, use, and disclosure of his/her identifiable confidential information and shall be given access to that information subject to the exclusions set out in PIPEDA (such as, but not limited to, legal exceptions, contains confidential information, relates to an investigation of a breach of an agreement or law, or contains information of other individuals that cannot be separated). An individual will be able to validate his or her personally identifiable information for accuracy and completeness, and to have it amended as appropriate.

Subject to the legal exceptions or as otherwise permitted by law, upon written request, Skate Canada will:

- inform an individual whether or not it holds information about the individual
- use its best efforts to indicate from whom this information was collected and to whom it has been disclosed

As part of the written request, an individual may be required to provide specific details information to permit Skate Canada to provide an account of the existence, use and disclosure of the confidential information. In addition, we will need to verify your identify before searching for or providing you with access to your information. The information will be used only for this purpose. We may also ask for additional information to confirm the

scope of your request, such as the relevant time period or specific description of the information you are seeking to access.

Once we receive your written request, verify your identity, and understand the scope of your request, Skate Canada will respond to an individual's written request to access their information within a reasonable time and at minimal or no cost to the individual. If there is a cost to the individual for access, Skate Canada will provide the individual an estimate of the cost. Skate Canada will respond to a request not later than 30 days after receipt of a written request. If for any reason we do not grant access, the individual will be provided with written reasons.

You can contact Skate Canada Privacy Office as set out below in the section entitled "Answering your privacy questions or concerns".

Answering your privacy questions or concerns

If you have any questions, concerns, or complaints about this Privacy Code, our Online Terms of use or our privacy practices, let us know right away. If you choose to send us an email, don't include sensitive information such as credit card or account numbers.

Skate Canada makes readily available to individuals' specific information about our policies and practices related to the management of confidential information in order to promote transparency and explicitness. Individuals will be able to acquire information in a form that is generally understandable. Skate Canada will provide information on policies and practices in various ways to registrants, members, coaches, sections, third-party service providers and the public including by talking to a service representative at our Skate Canada Ottawa Service Centre, and/or accessing the Skate Canada on-line Internet site.

Step 1: Talk to us

In most cases, a privacy question, concern or complaint is resolved simply by talking to us about it. You should be able to get swift results by talking to our Skate Canada Member Service team.

- **Talk** to a representatives of our Skate Canada Member Services division by calling 1-(888) 747-2372. Hours of operation are 8:00 am to 4:00 pm (ET)
- **Email us at**: info@skatecanada.ca

Step 2: Contact the Skate Canada Privacy Office

If your privacy question, concern, or complaint has not been resolved to your satisfaction, individuals can contact the Skate Canada Privacy Office:

Email us at: privacy@skatecanada.ca

Write to us at:
Skate Canada Privacy Office
800-333 Preston Street
Ottawa, ON K1S 5N4

Step 3: Escalate to the Office of the Privacy Commissioner of Canada

If the above steps fail to resolve the concern of the individual, individuals may also consider escalating the matter further by contacting the Office of the Privacy Commissioner of Canada (OPCC):

Telephone: 1-800-282-1376 (toll-free)
Website: www.priv.gc.ca
Write to: Office of the Privacy Commissioner of Canada
30 Victoria Street
Gatineau, Quebec K1A 1H3

Changes to our Privacy Code

We reserve the right to amend this Privacy Code at our discretion and at any time. Our Privacy Code is reviewed and approved on a regular basis, at minimum every two years or sooner if there are legislative or regulatory changes, as part of policy review and validation process and amended as appropriate to ensure individuals are aware of updates to our practices, streamline practices and to comply with all requirements by law. We encourage regular visits to our website for updates. We will post any Privacy Code changes on our website privacy page and, if the changes are significant, we will provide a more prominent notice. Any amendments or modifications to this Code shall apply automatically, unless otherwise indicated, and come into effect immediately upon their approval.

Definitions – Terms to help you understand our Privacy Code

Certain terms used herein may not be capitalized; however, for the purposes of this Privacy Code, to help you understand our Code the following terms herein have the ascribed meanings as set forth below. In addition, all references to the singular include the plural and vice versa.

affiliate means a section, a club or skating school who has an affiliation with Skate Canada

athlete means any person / skater who competes in the sport of figure skating at the national and/or international level as defined by Skate Canada

athlete support personnel, as defined by Sport Integrity Canada, means any coach, trainer, manager, agent, team staff, official, medical, paramedical, parent or any other person working with, treating or assisting an athlete participating in or preparing for sports competition

Board, pursuant to the Bylaws, means the board of directors of Skate Canada

Bylaws means the bylaws of Skate Canada in force and effect, and as may be amended from time to time

CADP means the Canadian Anti-Doping Program, as implemented, and managed by Sport Integrity Canada as revised from time to time and as endorsed and adopted by Skate Canada

COC means the Canadian Olympic Committee, who represents Canada at the International Olympic Committee and whose purpose is to transform Canada through the power for sport. This is achieved by leading the achievement of Team Canada's podium success and advancing Olympic values across Canada

CSSP means the Canadian Safe Sport Program, through which Sport Integrity Canada receives and responds to reports of prohibited behaviour under the Universal Code of Conduct to Prevent and Address Maltreatment in Sport (UCCMS) for designated individuals of national, federally funded NSOs, including Skate Canada

Case Manager means an appropriately qualified, external, independent, impartial, and confidential third-party person or organization with no personal ties to Skate Canada, a club/skating school, or a section retained as an external authority by Skate Canada through which an individual (with the exception of the Sport Integrity Canada Canadian Safe Sport Program (CSSP) for program signatories) may pursue the just, fair, and equitable resolution of

complaints of alleged, suspected or actual misconduct reported through the Skate-Safe program

CEO means Chief Executive Officer of Skate Canada, a Board appointed position

club, pursuant to the Bylaws***,*** means a not-for-profit organization that is operating for the general purpose of providing Skate Canada programs and is managed by a volunteer board of directors

code means a set of standards adopted by an organization to establish minimum expectations. Codes are a set of principles that express the organization's values and culture. Codes enhance the organization's reputation and promote compliance with laws and regulations applicable to the organization

Commissioner means the Privacy Commissioner appointed under section 53 of the Privacy Act of Canada

complainant means the individual(s) who has filed a report with the applicable external authority of an alleged, actual, or suspected violation of the Misconduct Reporting and Resolution Policy and/or the supporting procedure. The individual filing the report as the complainant could be (i) the impacted individual who directly experienced the alleged, actual or suspected misconduct; or (ii) an individual who was not directly impacted by the misconduct

confidential business information means non-public information. It is information about Skate Canada that has not been disclosed to the public. Confidential business information may include, but is not limited to, financial information projections, intellectual property, proprietary processes, proposed transactions, trade secrets, and information that might be useful to competitors or information about members, registrants, suppliers, or service providers. All information about, or received from, sponsors should be presumed to be confidential business information unless the contrary is clear

confidential information comprises individual's personal information, personal health information, confidential business information, and any other information about Skate Canada that has not been generally disclosed to the public. See also "personal information", "personal health information" and "confidential business information"

designated athlete support personnel means a coach designated by Skate Canada, integrated support staff (IST) designated by Skate Canada, Skate Canada Sectional Technical Directors, and employees of the High Performance division of Skate Canada who work with and support the national athlete pool (NAP) as part of the High Performance Program

director, pursuant to the Bylaws, means an individual elected or appointed to serve on the Board

electronic communication means communication using channels including but not limited to email, the Internet, the intranet, instant messaging, chat, text messaging, facsimile, voice communications, social media

employee means a person who is hired by Skate Canada on a permanent full-time or short-term on-going basis, or on a temporary / contract basis for a defined period of time. Employees may also include certain independent contractors who, while not technically employees within the meaning of applicable labour or tax laws, have been identified as being applicable in this Code

external authority means an independent external third-party designated and retained by Skate Canada to receive and resolve reports of misconduct. Specifically for Skate Canada, this means the Case Manager for the Skate-Safe program and Sport Integrity Canada for the Canadian Safe Sport Program (CSSP) for program signatories

individual means a natural person whose personal information has been collected, used, and disclosed and/or retained by Skate Canada, and includes past and current employees, officers, directors, officers, members of standing committees of the Board, members of operating committees or working groups of Skate Canada, members, registrants, parents (and guardians), program signatories, athlete support personnel, event volunteers, designated athlete support personnel, alumni of Skate Canada, inductees of Skate Canada Hall of Fame, third-party service providers, event/competition spectators (in-person and/or via on-line streaming services), and, for the purposes of this Code, sections, and anyone else associated, affiliated, or engaged in activities, events/competitions, and programs with and/or hosted by Skate Canada but does not include such legal persons as corporations

IOC means the International Olympic Committee, the entity that is the guardian of the Olympic Games and the leader of the Olympic Movement and who acts as a catalyst for collaboration between all Olympic stakeholders, including the athletes, the National Olympic Committees (the COC for Canada), the International Federations, Organising Committees for the Olympic Games (the ISU for figure skating and speed skating), the Worldwide Olympic Partners, and Olympic broadcast partners. It also collaborates with public and private authorities including the United Nations and other international organisations

ISU means the International Skating Union, which is the exclusive international sport federation recognized by the International Olympic Committee (IOC) administering sports in the branches of figure skating and speed skating throughout the world. The ISU is composed of a number of national associations called ISU Members, who administer ISU sports at the national level and recognize that all international matters are under the sole jurisdiction and control of the ISU.

ISU is responsible for the ISU Anti-Doping Rules and ISU Anti-Doping Procedures, as compiled in accordance with the WADA Code, which apply to all skating activities over which the ISU has jurisdiction

law means any applicable legislation, statutes, regulations, policies, rules, and codes of conduct established by government, legal or regulatory authority, or by any self-regulatory industry association by which Skate Canada is or has agreed to be bound

member, pursuant to the Bylaws, means each person that meets the requirements of any of the three Member classes as defined in Article 3 of the Bylaws and that has been duly admitted as a member of Skate Canada (which includes coaches, clubs, and skating school)

membership, pursuant to the Bylaws, means the status of being in one of the classes as outlined in section 3.1 of the Bylaws

minor means a child under the age of majority, as defined in the relevant province or territory of Canada, as may be amended from time to time. It is the responsibility of the adult to know the age of a minor

NSO means National Sport *Organization**, which,*** as defined by Sport Canada, are the national governing bodies for a given sport in Canada. The NSO for figure skating in Canada, as recognized by Sport Canada, is Skate Canada

officer, pursuant to the Bylaws, means the President and such other officers as the Board may determine by Ordinary Resolution

organization collectively means Skate Canada, unless otherwise noted

permitted or required by law or "legal and regulatory obligations" means actions that we are permitted or required to do under applicable laws, statutes, regulations or applicable policies, rules, codes, guidelines, expectations, or requests of any regulator or self-regulatory organization, or under rules, codes, programs, protocols, guidelines, or principles by which Skate Canada is or has agreed to be bound

personal information means information about an identifiable individual. This may include, without limitation, the individual's name, contact information (residential address, home and/or cellular telephone number(s), email or other electronic communication address, social media account name, fax number), login credentials to Skate Canada owned IT resources (as applicable), digital information (for example, but not limited to information regarding your devices such as your internet protocol (IP), internet service provider, location, operating system (MAC OS, iOS, Windows, Android, etc.) and version of browser used to access our website, the

date and time of access to our website, and your activity/usage of our website and applications), date of birth, gender, government issued identification number (e.g., Social Insurance Number, passport number), personal health information, criminal record checks, payroll/employee identification, employment history, personal references, salary/compensation history, financial status, pension contributions, employee benefit information, emergency contact information, financial information (such as credit card and direct deposit banking information). Personal information also includes information that may relate to the work performance of the individual (performance appraisals), absenteeism, and training history/evaluations.

For all individuals including sections, personal information includes any injury claim reports, allegations, investigations or findings of wrongdoing, misconduct or discipline stemming from (i) a complaint through the internal Ombudsperson process, and/or (ii) a complaint of misconduct, complaint of a breach of the Code of Ethics and/or an incident of injury report through the Safe Sport processes (including the Safe Sport division of Skate Canada, and external authorities as applicable), and/or (iii) a general dispute through Skate Canada.

For registrants, in addition to the information outlined above, personal information also includes but is not limited to information related to assessment results and program information for skaters, and qualifications for officials.

For event volunteers, in addition to the information outlined above, personal information may also include information related to training, education, work experience, volunteer experience and qualifications, and expense information.

In general, personal information includes any information that could be used to commit identity theft or other forms of fraud. All information about or received from individuals and/or third-party service providers should be presumed to be personal information unless the contrary is clear.

By virtue of applicable privacy legislation, personal information does not include business contact information that is collected, used, or disclosed solely for the purpose of communication or facilitating communication with an individual in relation to their employment, business, or profession such as the individual's name, position name or title, work address, work telephone number, work fax number or work electronic addresses.

This information can be in any form including but not limited to correspondence, paper, electronic, electronic communications, video or voice recording, photograph, film, sound recording, videotape, machine-readable record, and any other documentary material, regardless of physical form or characteristics, and any copy of any of those things.

personal health information, with respect to an individual, as applicable, means identifying information about an individual in oral or recorded form, if the information:

- relates to the physical or mental health of the individual, including information that consists of the health history of the individual's family
- relates to the provision of health care to the individual, including the identification of a person as a provider of health care to the individual
- is collected incidentally to the provision of health services to the individual (such as the individual's payments or eligibility for health care, eligibility for coverage for health care, the individual's entitlement to payment for an insurance claim for an injury
- is the individual's health number
- identifies an individual's substitute decision-maker

policies and procedures mean all applicable manuals, guidelines, handbooks, job aids, forms, policies, procedures, codes, protocols, and standards as implemented by Skate Canada, including those that relate to how Skate Canada wishes to manage its business in accordance with its business strategy and risk appetite

President, pursuant to Bylaws, means the chair of the Board and officer of Skate Canada

Privacy Officer means a Board appointed position accountable for overseeing privacy governance, all activities related to the implementation of, and adherence to, the organization's privacy policies and to ensure operational procedures are in compliance with relevant privacy laws

program signatory(ies) means designated persons named on an annual basis by Skate Canada (NSO) as participants (as defined by the Universal Code of Conduct to Prevent and Address Maltreatment in Sport (UCCMS)) to the Sport Integrity Canada complaint management process through the Canadian Safe Sport Program (CSSP)

registrant**,** pursuant to the Bylaws, means (i) an individual who is registered by a club or skating school with Skate Canada and who is subject to all applicable rules, regulations, and policies of Skate Canada but who is not a member; and (ii) an individual who is engaged in any activity provided, sponsored, supported, sanctioned, or recognized by Skate Canada and registered directly with Skate Canada but who is not a member

respondent means an individual who is alleged to have engaged in one or more action, conduct and/or behaviour of misconduct and thereby to have violated the Misconduct Reporting and Resolution Policy and/or the supporting procedure

section, pursuant to the Bylaws***,*** means an organization incorporated or organized in a particular province or territory (and in some cases, a combination thereof) strategically aligned

with Skate Canada, that may receive funds from provincial or territorial Governmental Authorities and be subject to applicable sport recognition programs and transfer payment arrangements. Each Section is held to the governance and operating requirements of their respective province and / or territory(ies) and is responsible for skating in their respective jurisdictions

Skate-Safe is a program that is part of the Skate Canada National Safe Sport Program through which a Case Manager, as a designated external authority, receives and responds to reports of misconduct under the Misconduct Reporting and Resolution Policy for individuals (other than those individuals designated as program signatories)

skater means (i) a person who is registered at a club or skating school with Skate Canada and who is subject to all applicable rules, regulations, and policies of Skate Canada but who is not a member; and (ii) a person who is engaged in any activity provided, sponsored, supported, sanctioned, or recognized by Skate Canada and registered directly with Skate Canada but who is not a member

skating school, pursuant to the Bylaws***,*** means an organization other than a club that is operating for the general purpose of providing Skate Canada skating programs

social media means interactive digital-media technologies that facilitate the creation and sharing of information, ideas, and other forms of expression via virtual communities and networks

Sport Canada means the division of the Government of Canada that provides leadership and funding to help ensure a strong Canadian sport system which enables Canadians to progress from early sport experiences to high performance excellence, including the Athlete Assistance Program (AAP)

SDRCC means the Sport Dispute Resolution Centre of Canada***,*** and is the entity created through the Government of Canada's Physical Activity and Sport Act with the mandate to provide to the sport community a national alternative dispute resolution service for sport disputes; and expertise and assistance regarding alternative dispute resolution

Sport Integrity Canada, which is an independent, national, not-for-profit organization. The core mandate of Sport Integrity Canada is to be a regulator for sport at the national level administering the Canadian Anti-Doping Program (CADP), the Canadian Safe Sport Program (CSSP), and the Canadian Program to Prevent Competition Manipulation (CPPCM) [*Note - Previously known as the Canadian Centre for Ethics in Sport (CCES)]*

third-party service provider means an individual or corporate entity having a business relationship of any kind with Skate Canada (such as, sponsors, partners, suppliers, service providers, consultants, event volunteers, etc.)

UCCMS means the Universal Code of Conduct to Prevent and Address Maltreatment in Sport, in force and effect and as may be amended from time, and serves as the core document that sets harmonized rules to be adopted by sport organizations that receive funding from the Government of Canada to advance a respectful sport culture that delivers quality, inclusive, accessible, welcoming, and safe sport experiences

WADA means the World Anti-Doping Agency, which is an international independent agency composed and funded equally by the sport movement and governments of the world. Its key activities include scientific research, education, development of anti-doping capacities, and monitoring of the World Anti-Doping Code (WADA Code) – the document harmonizing anti-doping policies in all sports and all countries – which includes the possible Anti-Doping Rule Violations (ADRV)

WADA Code means the WADA Anti-Doping Code, which is a core document, as revised from time to time, that provides the framework for anti-doping policies, rules, and regulations within sport organizations and among public authorities, and is designed to harmonize anti-doping policies and ensure the standards are the same for all athletes

we, us, our means Skate Canada, unless noted otherwise

Related Documents

Legislation
- Personal Information Protection and Electronic Documents Act
- Breach of Security Safeguards Regulations
- Canada Anti-Spam Legislation

Skate Canada Policies / Procedures
- Code of Ethics
- Online Terms of Use (Skate Canada website)
- National Safe Sport Program, including
  - Misconduct Reporting and Resolution Policy and procedure thereunder
  - General Dispute Reporting and Resolution Policy and procedure thereunder
  - Incident of Injury Reporting and Management Policy and procedure thereunder

Concussion Management Policy, and protocol thereunder

Forms

Personal Information Access Request Form
Withdrawal of Consent Request Form

Appendix: Notice of Collection

By signing below, you acknowledge that you have read, understood and agree to comply with the Skate Canada Privacy Code as provided and hereby request, and consent to, the registering of myself with Skate Canada.

By signing below and registering with a club or skating school and allowing yourself to be registered nationally with Skate Canada and submitting this form, you indicate your acceptance of all terms and conditions associated with the Skate Canada Privacy Code and expressly provide your consent to the collection, use and disclosure of your confidential information to register you with Skate Canada in any capacity including, without limitation, as a Skate Canada registrant, coach or in connection with your affiliation with a skating club or skating school and to administer various services, such as Skate Canada programs, services and events, contact you to provide you with relevant offers regarding events and competitions, all as set forth in the Privacy Code. In addition, through the submission of form, you expressly consent to the sharing or exchange of your confidential information with Skate Canada affiliates, which includes your local skating club or skating school or provincial association or section, and with service providers.

Individual

Printed Name (First and Last): _____

Signature: _____

Date (mm/dd/yyyy): _____

If the individual is a minor (under the age of majority as defined in the relevant province or territory of Canada that the individual resides), the next section must be completed.

Parent / Guardian for an individual who is a minor

A parent or guardian's signature must be obtained if the individual is a minor at the time of signing this acknowledgement. This parent or guardian's signature can be in addition to or in place of the skater's signature.

I am the parent/guardian of _____, who was born on _____ and is therefore a minor at the time of signing this acknowledgment with Skate Canada.

By signing below and registering my minor child with a club or skating school and allowing your minor child to be registered nationally with Skate Canada and submitting this form, you indicate your acceptance of all terms and conditions associated with the Skate Canada Privacy Code and expressly provide your consent to the collection, use and disclosure of your minor child's confidential information to register your minor child with Skate Canada in any capacity including, without limitation, as a Skate Canada registrant, coach or in connection with your affiliation with a skating club or skating school and to administer various services, such as Skate Canada programs, services and events, contact you to provide you with relevant offers regarding events and competitions, all as set forth in the Privacy Code. In addition, through the submission of form, you expressly consent to the sharing or exchange of your confidential information with Skate Canada affiliates, which includes your local skating club or skating school or provincial association or section, and with service providers.

Printed Name (First and Last): _____

Signature of Parent / Guardian: _____

Date (mm/dd/yyyy): _____