Purpose:

- Privacy of personal information is governed by the Personal Information Protection and Electronics Documents Act ("PIPEDA"). This policy describes the way that Special Olympics Manitoba collects, uses, retains, safeguards, discloses and disposes of personal information, and states Special Olympics Manitoba's commitment to collecting, using and disclosing personal information responsibly. This policy is based on the standards required by PIPEDA, and Special Olympics Manitoba's interpretation of these responsibilities.

Accountability:

- Simon Mundey has been designated the Special Olympics Manitoba Privacy Officer and is responsible for the monitoring information collection and data security, and ensuring that all staff receive appropriate training on privacy issues and their responsibilities. The Privacy Officer also handles personal information access requests and complaints. The Privacy Officer may be contacted at the following address:

  Special Olympics Manitoba
  200 Main Street
  Winnipeg, Manitoba
  R3C 4M2

  Email: smundey@specialolympics.mb.ca
  Phone: (204) 925-5630

Personal Information We Collect:

- Personal information will only be collected by Special Olympics Manitoba when it is supplied voluntarily by you and will be used only to meet and maintain the highest quality of sport programming for persons with an intellectual disability. Personal information may include information that relates to an individual's personal characteristics (e.g., gender, age, home address, phone number, name of group home and manager), their health (e.g., medication, type of intellectual disability, medical conditions, special diets, allergies, behavioural concerns and emergency contact) programs in which you will be participating, cross-cultural information, screening information, coaching certification, credit card information for on line donations and photographs. Personal information, however, does not

include business information (e.g., an individual's business address and telephone number), which is not protected by privacy legislation.

Special Olympics Manitoba's website utilizes cookie based technology to store information. This information does not contain personal information but enables us to communicate more meaningfully with you and allows us to evaluate the effectiveness of our programs, communication and marketing.

Use of Information

- Special Olympics Manitoba collects personal information from prospective athletes, coaches, officials, volunteers, sponsors, donors, family members and staff for purposes that include, but are not limited to, the following:

  a) To establish your identity;
  b) Name, address, phone number, fax number and email address for the purposes of communicating with you;.
  c) To respond to your inquiries;
  d) To determine eligibility for registration as an athlete or volunteer.
  e) Banking information, social insurance number, addresses, criminal records check, resume, and beneficiaries for Sport Manitoba's payroll, company insurance and health plan;
  f) Criminal records check and related personal reference information for the purpose of implementing Special Olympics Manitoba's volunteer screening program;
  g) Personal health information including provincial health card numbers when traveling, allergies, emergency contact, behavioral information and current medical history for use by coaches and other program personnel. This information will be used for training and competitive purposes or in the case of a medical emergency;
  h) Athlete information including height, weight, uniform size, shoe size, feedback from coaches, performance results for athlete registration forms, outfitting uniforms, best contact information, media relations, and various components for athlete and team selection;
  i) For processing donations when donating on line with a credit card;
  j) Marketing information including attitudinal and demographic data on individual members to determine membership demographic structure, and program wants and needs;
  k) Name, address, phone number, cell phone number, fax number and e-mail address for the purpose of providing insurance coverage, managing insurance claims and conducting insurance investigations.

l) Administer and manage our programs and services to athletes, families and volunteers;

- Special Olympics Manitoba may also share your personal information with third party data processors, vendors, suppliers and providers responsible for administering marketing, fund raising and promotional activities or for providing programs and services, on our behalf, but only if we acquire your consent in accordance with paragraph 6 or 7 to do so. We will require the organizations with whom we share your personal information, for these purposes, to have policies regarding personal information consistent with our Privacy Policy or to abide by our policies as relevant to the personal information we share with them.

Consent

- Consent is required to be obtained 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 information. Special Olympics Manitoba may collect personal information without consent where reasonable to do so and where permitted by law.

- Special Olympics Manitoba may collect personal information about individuals who are under the age of majority or are otherwise not able to give valid consent. At or before Special Olympics Manitoba collects personal information about an individual that Special Olympics Manitoba knows is not able to give consent, we will acquire the consent of someone who is able to give consent on your behalf, such as a parent, legal guardian, public trustee or substitute decision maker in accordance with the Vulnerable Persons Living With a Disability Act, the Mental Health Act, or any other applicable legislation.

- By providing personal information to Special Olympics Manitoba, individuals are consenting to the use of the information for the purposes identified in this policy.

- Special Olympics Manitoba 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.

- 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 gives one week's notice of such withdrawal to Special Olympics Manitoba. The Privacy Officer will advise the individual of the implications of such withdrawal.

Limiting Collection

- All personal information will be collected fairly, by lawful means and for the purposes as specified in this policy. Special Olympics Manitoba will not use any form of deception to obtain personal information.

Limiting Use, Disclosure and Retention

- Personal information will not be used or disclosed by Special Olympics Manitoba for purposes other than those for which it was collected as described herein, except with the consent of the individual, pursuant to paragraph 7, or as required by law.

- Personal information will be retained for only as long as necessary to implement and evaluate our programs and in accordance with legal requirements.

- 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.

- Special Olympics Manitoba may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where Special Olympics Manitoba 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.

- Documents will be destroyed by way of shredding and electronic files will be deleted in their entirety. When hardware is discarded, Special Olympics Manitoba will ensure that the hard drive is physically destroyed.

Accuracy

- Special Olympics Manitoba 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

- 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.

- 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.

Openness

- Special Olympics Manitoba will publicize information about its policies and practices relating to the management of personal information. This information is available through this policy, on Special Olympics Manitoba's web site or upon request by contacting the Privacy Officer.

- The information available to the public includes:

  a) The name or title, address and telephone number of Special Olympics Manitoba'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 Special Olympics Manitoba, including a general statement of its approved uses.

Individual Access

- Upon an individual's written request, or the written request of one of the qualified representatives described in paragraph 7, and with assistance from Special Olympics Manitoba, 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.

- Requested information will be disclosed to the individual, or to his or her qualified representative, within 30 days of receipt of the written request at no cost to the individual, or at nominal cost relating to photocopying expenses, unless there are reasonable grounds to extend the time limit.

- If personal information is inaccurate or incomplete, it will be amended as required.

- 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, litigation or medical privilege.

- Upon refusal, Special Olympics Manitoba will inform the individual the reasons for the refusal and the associated provisions of PIPEDA.

Challenging Compliance

- An individual or legally authorized representative may challenge Special Olympics Manitoba's compliance with this policy and PIPEDA, by submitting a challenge in writing.

- Upon receipt of a written complaint, Special Olympics Manitoba will:

  a) Record the date the complaint is received;
  b) Notify the SOM 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;
  d) Appoint an investigator;
  e) Notify the complainant of the outcome of the investigation or advise of the necessity of an extension to respond to the challenge within 30 days of the initial complaint. If an extensions necessary the compliant will also be advised of their right to make the complaint to the Privacy Commissioner of Canada

- An individual may appeal a decision made by Special Olympics Manitoba under this Policy, in accordance with Special Olympics Manitoba's policies for appeals.