



"Home to Wushu
in Ontario"

WOP13-Privacy Policy

EFFECTIVE: July 1st, 2016

WushuOntario 2370 Midland Ave, #B22, Scarborough, ON, M1S 5C6 416-321-5913 Fax: 416-321-5068, www.wushuontario.ca

WushuOntario – Privacy Policy

Introduction: The WushuOntario Privacy Policy informs parents, athletes and stakeholders how personal information is collected, used, disclosed and protected. This policy meets the requirements with respect to personal information under applicable Canadian privacy legislation.

Your Privacy Is Important to Us: We value the trust you have placed in us and keeping your personal information in confidence is an integral part of our commitment to our members. To help us meet this commitment to you, WUSHUONTARIO has appointed a Director of Communications to oversee WUSHUONTARIO's privacy practices and this privacy policy.

Your Privacy Is Important to You: We encourage you to read this privacy policy so that you can understand how we collect, use, share, and protect your personal information and how you can manage your information in a way that best suits you. To help you understand our privacy policy, here are some important terms you should know:

DEFINITIONS

1. The following terms have these meanings in this Policy:
 - a. **"Individuals", "You", "Members"** – Means all WushuOntario Members as defined in the WO Bylaws and Membership Policy, and all individuals employed (including contract personnel) by or engaged in activities with WushuOntario, including but not limited to, directors, committee members, athletes, coaches, officials, referees, volunteers, officers, managers and administrators.
 - b. **"WUSHUONTARIO", "we", "our", "us" or "WO"** means collectively WushuOntario, WushuCanada, International Wushu Federation and its governing body affiliates that are entrusted to provide Wushu related events and services. When we make reference to sharing information within the WUSHUONTARIO Group it means sharing by one member of the group to some or all of the others in the group.
 - c. **"Personal information" or "information"** – The term includes, but is not limited to the following:
 - i. Personal Information of WushuOntario participants, members and Individuals, including but not limited to: name, address, e-mail, telephone number, cell phone number, date of birth, financial information, medical history, etc. This information can be in any form including paper, electronic, video or voice recording.
 - ii. Personal Documentation such as Passport, identification documents, medical documentation, personal letters, comments and other information that is not generally or publicly known.
 - d. **"Program partners"** means associations, government resources and/or companies we have carefully selected to provide benefits, products or services under, or to participate in, a WUSHUONTARIO partner program.
 - e. **"WUSHUONTARIO partner program"** means a program under which WUSHUONTARIO members are entitled to receive specified benefits,



products or services that are provided by, or in participation with, our program partners. For example, sponsor programs or travel partner programs who offer promotions or coupons to our membership.

- f. **"permitted or required by law"** or **"legal and regulatory obligations"** means actions that we are permitted or required to do under any laws or regulations, or any rules, codes, guidelines, expectations, or requests of any applicable regulator or self-regulatory organization, or under any codes, programs or principles publicly adopted by WUSHUONTARIO.

PURPOSE

2. The purpose of this policy is to ensure the protection of Personal Information that is proprietary to WushuOntario by making all Individuals aware that there is an expectation to act at all times appropriately and consistently with this policy.
3. This privacy policy is consistent with our WUSHUONTARIO Privacy Principles and is in addition to our Online Privacy Statement and the terms of your agreements with us. This policy applies to the collection, use or sharing of any personal information collected by WUSHUONTARIO in the course of conducting its business in Canada.
4. By providing us with information, you are consenting to our privacy policy. For more about our privacy practices see the WUSHUONTARIO Privacy Principles, Online Privacy Statement or our Privacy FAQ or see the **"How to Contact Us"** section below.
5. This privacy policy or our other privacy related documents will be updated from time to time.

APPLICATION OF THIS POLICY

6. This policy applies to all Individuals and Personal Information as defined above.

RESPONSIBILITIES

7. Individuals will not, either during the period of their involvement/employment or any time thereafter, disclose to any person or organization any Personal Information acquired during their period of involvement/employment with WushuOntario, unless expressly authorized to do so.
8. Individuals will not publish, communicate, divulge or disclose to any unauthorized person, firm, corporation, third party or parties any Personal Information or any part thereof, without the express written consent of WushuOntario.
9. All files and written materials relating to Personal Information will remain the property of WushuOntario and upon termination of involvement/employment with WushuOntario or upon request of WushuOntario, the WO Representative will return all Personal Information received in written or tangible form, including copies, or reproductions or other media containing such Personal Information, immediately upon such request.
10. Personal Information does not include the following: name, title, business address, work telephone number, or any other information if it is widely available or posted publicly.
11. Individuals voluntarily publishing, or consenting to the publication of, basic personal information in a public forum (such as the listing of an email address on a website)



forfeit the expectation of privacy for that personal information for as long as it is available publicly.

COLLECTION OF INFORMATION

12. Individual confidential information may be collected by means of written and physical documentation and in addition via online and electronic communication.
13. All written material (including material in electronic format) and other works produced in connection with employment or involvement with WushuOntario will be used solely by WushuOntario, for the purposes of statistical collection, event registration, administration/organization, and travel requirements.
14. The type of personal information we collect will depend on various factors such as the type of membership or event you request or participate in and any applicable legal and regulatory obligations. This information includes:
15. **Contact** – information that allows us to communicate with or contact you (e.g., address, telephone number, e-mail or other electronic address, social media account name and fax number).
16. **Identity** – information that allows us to identify you or for specific event and other registration legal and regulatory obligations (e.g., name, passport, date of birth, occupation, and government-issued identification).
17. **History and Past Participation** – information about how you and your past experience and/or history in Wushu and related activities.
18. **Relationship** – information that helps us to understand more about you including how you like communicate and receive feedback (e.g., language and communication preferences, location, demographics and interests).
19. **Medical and Health** – information about your health, such as information necessary to determine eligibility for events and insurance. Due to the sensitive nature of this type of information, health information is only used for registration and qualification to participation purposes by appointed personnel.
20. **Another Individual** – information we request, or that you provide, about an individual other than yourself (e.g., information about parents, an authorized signee of your information, and contact information of someone you believe may be interested in a WUSHUONTARIO event or service). If you provide us with information about another individual, we will assume you have the authority to provide this information and to consent to its collection, use or sharing for the purposes set out in this privacy policy.
21. We collect information from a variety of sources but much of the information comes from you (e.g., applications for or use and participation of services, communications with us, and user-generated content on our social media websites such as photographs or comments you post).
22. We also collect information from other sources such as police checks, references you have provided, program partners, government or from public sources such as telephone directories, newspapers, Internet sites, commercially available marketing lists or government agencies and registries or public records.
23. We may monitor or record communications between you and our representatives (e.g., event videos) in order to enhance and maintain records, to protect you and WUSHUONTARIO. We use video, including full event recording, in and around our events, records of our participants, staff and others, to protect against illegal activity,



such as theft, vandalism and fraud, or to enhance and maintain future documentation of our events.

HOW WE USE AND SHARE INFORMATION

24. We use and share personal information for the following purposes, to:

a. Provide You with Events, Products or Services

- i. Establish your identity and determine your eligibility for events, products or services.
- ii. Help to ensure that the events, products or services offered to or purchased by you are appropriate for you
- iii. Register, manage, administer and maintain your events, products or services.

b. Communicate with You

- i. Send communications by various methods, such as mail, e-mail, text (SMS), telephone, automatic dialing-announcing device (at the numbers you have provided to us), fax, or other telecommunication channels, or social media, including marketing or communications about benefits, features or other details about events, products or services.

c. Provide You with Opportunities

- i. Review and analyze your applications and other information to understand who you are, your registration events, and what goals, services, and stages of training and/or certification may be of interest to you, including targeting seminars/clinics based on information that we have collected.
- ii. Promote and market events, products or services offered by the WUSHUONTARIO Group, by our program partners or other third parties we have carefully selected.
- iii. Better manage and improve your overall relationship with the WUSHUONTARIO Group including monitoring, reviewing or improving member service and business processes to make it easier to communicate with us.
- iv. Encourage you to continue participation and enhance your relationship with WushuOntario and the Wushu movement.

d. Accurately Manage our Business

- i. Perform our everyday business and operations including record keeping or internal reporting (e.g., if you have provided your Passport it can be used as an internal identification number to accurately identify you from members having the same or similar names)
- ii. Understand and better manage WUSHUONTARIO Group's business and to develop events, products and services, including conducting market research or analyzing data we hold about you.
- iii. Administer event and competition arrangements.
- iv. Use third-party service providers to perform services on our behalf.
- v. Periodically update your information with partners as long as you are attending events or service with us and for a reasonable period of time thereafter.



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- vi. Manage WUSHUONTARIO Group's insurance, business and other risks as may be required to operate as an effective, efficient provincial sports organization that meets government recognition, tax, legal and regulatory obligations.
- vii. Protect you and us from error and criminal activity including the prevention, detection and investigation of fraud, cyber threats and other such risks and threats (e.g., we will review and analyze your applications, transactions and other information to help us identify various types of threats and risks such as fraud, and harassment)

25. Some of the specific ways we use and share your information within the WUSHUONTARIO Group or with third parties include:

- a. **Program Partners** – We share information with our program partners to help determine your eligibility for a WUSHUONTARIO partner event/program. If you participate in a WUSHUONTARIO partner event/program, we also share information in order to administer, develop, manage and promote the WUSHUONTARIO partner program including, reporting on and analyzing the event/program's performance and results, developing new events and benefits, products or services, and conducting market research. If you withdraw your consent to this sharing we may not be able to provide you with the event, product or service that may interest you.
- b. **Representatives** – Where someone is authorized to register you for an event, product or service (e.g., parent, guardian, coach), or where liability is shared with others (e.g., someone has provided a guarantee or indemnity for your obligations), we may share your information with them (or their representative) in connection with the event, product or service. Where someone is acting as a representative or we reasonably believe is acting with proper authorization (e.g., legal guardian, a person having power of attorney, estate representative, a lawyer, an accountant, and, for minor children, a parent or guardian) we may share information with and take instructions from them.
- c. **Protect You** – Where you may be injured in an event or service and require medical attention, a victim of harassment, abuse, or other illegal activity or where we have reasonable grounds to believe your interests can best be served by taking action, we may share information with the appropriate legal or governmental authorities, your next of kin or any other appropriate person (e.g., notification of our concerns regarding potential medical status may be provided to a public guardian, medical attendant, or authority). In these circumstances, we will only share information we believe is reasonably necessary to protect your health and interests.
- d. **Protect Us** – We share information to protect our rights or interests. For example, where we are involved in judicial, administrative or regulatory proceedings, or other similar processes including enforcing our rights (e.g., to participate and meet our governing duties). Or, in order to comply with any legal and regulatory obligations including any subpoena, warrant, or any judicial, administrative orders or demands.



- e. **Transactions** – If we enter into a transaction involving personal information, such as registration or purchasing travel tickets or hotel registrations, we may share information with the other parties to the transaction (e.g., as part of due diligence or on completion of the transaction). We require that the other parties keep this information confidential and limit its use to the purposes of the transaction. Where we enter into a business transaction involving the purchase of information by us, this policy will apply to our collection, use and sharing of the purchased information.

PROTECTING YOUR PERSONAL INFORMATION

26. At WUSHUONTARIO we take the protection of your personal information seriously. We make reasonable efforts to prevent unauthorized use, sharing, loss or theft of information. We regularly review our security procedures and assess that they remain effective and appropriate.
- a. Staff and employees who have access to your information are made aware of the importance of keeping it confidential. Depending on the nature of the information, it may be stored in the main office of WO, in various computer systems, or in the record storage facilities of the WUSHUONTARIO Group or partner organizations.
 - b. Where we use service providers who might have access to information, we select them carefully and require them to have privacy and security standards that meet WUSHUONTARIO's requirements. We use contracts and other measures with our service providers to maintain the confidentiality and security of your information and to prevent it from being used for any other purpose.
 - c. WUSHUONTARIO, service providers and other parties with whom we share information under this privacy policy, 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. For example, information may be shared in for international events or in response to valid demands or requests from government authorities, courts and law enforcement officials in those countries.
 - d. The length of time we keep your information will vary depending on the event, product or service and the type of the information. We keep your information for as long as we reasonably need it for accurate and efficient service, legal or reasonable business purposes. For these reasons, we keep your information beyond the end of your relationship with us. When your information is no longer required, we securely destroy it or delete personally identifiable information.

YOUR PRIVACY CHOICES

27. Subject to legal, business or contractual requirements, you can withdraw your consent to our collection, use or sharing of information at any time upon giving us reasonable notice. However, withdrawing your consent may limit or prevent us from providing you



with, or being able to continue to provide you with, access to event, specific products or services. For example, if you choose not to provide us with your PASSPORT, we will not be able to register you with any international event where the collection of passport is required under regulations.

28. In particular, during your membership, we provide you with the following privacy choices:

- a. **Passport:** Including your passport in your registration is the best way to make sure registration information accurately refers to you. However, this use of your Passport is optional and if you choose not pursue international events or competition.
- b. **Marketing:** Subject to applicable law, from time to time the WUSHUONTARIO Group may offer you events, products or services, including special promotions, which may be of interest to you. This consent is optional and you can decide to withdraw it at any time. However, this will not limit the information provided to you through discussions with a WUSHUONTARIO representative or through general WUSHUONTARIO marketing or servicing channels (e.g., electronic messages or our website), or information we send you that is related to your existing events, products and services or is permitted or required by law. Please note that it may take up to 10 business days to fulfil your request to unsubscribe from electronic messages.
- c. **Video Recording:** If you do not wish to have your image or presence recorded, you have the option to request this by writing to us. However, if required to judge or to accurately officiate your participation, this may affect your eligibility to participate in the particular event or competition.
- d. In certain circumstances your consent cannot be withdrawn. For example, you may not withdraw your consent where our collection, use or sharing is permitted or required by law or the governing body of an event. This may be for use to prove citizenship or age eligibility for events and categories. Your consent to the exchange of information cannot be withdrawn during this time.

29. Keeping Your Information Updated

We take care to keep the information in our records as accurate, complete and up to date as necessary for the purposes for which it is used. However, we also rely on you to tell us when your information changes. Keeping your information accurate and up-to-date allows us to continue to offer you the highest accuracy.

30. Accessing Your Information

You have the right to access personal information we hold about you. Much of your information is available to you by contacting us.

ENFORCEMENT

31. A breach of any provision in this policy may give rise to discipline in accordance with the WushuOntario Discipline policy or other legal recourse.



32. Website Privacy Statement:

- a. WO, through its website host, records visits to the WO website and logs the following information for statistical purposes: the user's server or proxy address, the date/time/length of visits and the files required. The information is used to analyze our server traffic.
- b. No attempt will be made to identify users or their browsing activities except where authorized by law. For example in the event of an investigation, a law enforcement agency may exercise their legal authority to inspect the internet service provider's logs. If you send us an email message we will record your contact details and this information will only be used for the purpose for which you have provided it.
- c. We will not use your email for any other purpose and will not disclose it without your consent. When users choose to join a mailing list their details are added to that specific mailing list and used for the stated purpose of that list only.
- d. WO is not responsible for the privacy practices or the content of the linked web sites and the other pages hosted by WO on behalf of non-WO agencies and organizations.

33. Disclaimer: The material on the WO website is made available on the understanding that users exercise their own skill and care with respect to its use. Before relying on material in any important matter, users should carefully evaluate the accuracy, completeness and relevance of the information and should obtain appropriate professional advice relevant to their particular circumstances.

34. Addressing Any Privacy Concerns

If you have any complaints, questions or concerns about this privacy policy or our privacy practices please let us know right away. If you choose to send us an e-mail, do not include sensitive information.

Step 1: Talk to Us

In most cases, a complaint, question or concern is resolved simply by talking to us about it. You should be able to get swift results by talking to a WUSHUONTARIO representative.

Be sure to include your name and contact information where you prefer to be reached, the nature of your complaint, question or concern, details relevant to the matter and with whom you have already discussed the issue.

Step 2: Responsibility

If your complaint, question or concern has still not been resolved to your satisfaction, feel free to contact the WUSHUONTARIO Director of Communications or other administrators:

- a. WO - Director of Communications: Mr. Andre Jagon is the appointed designate for overseeing the data collection process and is ultimately accountable for compliance with this policy.



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- b. Wushu Club System Administrators Where Wushu Clubs are disclosing or transferring personal information to WO directly on behalf of a member, they shall keep a signed consent form on file for each member.
- c. Provincial Wushu Associations or Other Associate Associations where the associations are disclosing or transferring personal information to WO directly on behalf of a member, they shall keep a signed consent form on file for each member.