



## Personal Information Protection Policy

---

Deep Blue Athletics Ltd. (DBA) is committed to safeguarding the personal information entrusted to us by our members. We manage your personal information in accordance with Alberta's *Personal Information Protection Act* and other applicable laws. This policy outlines the principles and practices we follow in protecting your personal information.

A copy of this policy is provided to any member upon request.

### **What is personal information?**

Personal information means information about an identifiable individual. This includes an individual's name, home address and phone number, age, sex, email address, Alberta Health Care number etc.

### **What personal information do we collect?**

We collect only the personal information that we need for the purposes of providing services to our members, including personal information needed to:

- enroll a member in a program
- payment information for uniforms and fees
- register our members with the Alberta Cheerleading Association
- register our members for competitions

We normally collect member information directly from our members. We may collect your information from other persons with your consent or as authorized by law.

We inform our members, before or at the time of collecting personal information, of the purposes for which we are collecting the information. However, we don't provide this notification when a member volunteers information for an obvious purpose. (for example, producing a credit card for a purchase when the information will be used only to process the payment).

### **Consent**

We ask for consent to collect, use or disclose member personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask members to

provide their consent orally (in person, by telephone), in writing (by signing a consent form, by checking a box on a form, or electronically (by clicking a button).

A member may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfill our legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary personal information.

We may collect, use or disclose member personal information without consent only as authorized by law. For example, we may not request consent when the collection, use or disclosure is reasonable for an investigation or legal proceeding, to collect a debt owed to our company, in an emergency that threatens life, health or safety, or when the personal information is from a public telephone directory.

### **How do we use and disclose personal information?**

We use and disclose member personal information only for the purposes for which the information was collected, except as authorized by law. For example, we may use member contact information to deliver goods. The law also allows us to use that contact information for the purpose of collecting a debt owed to our company, should that be necessary.

If we wish to use or disclose your personal information for any new business purpose, we will ask for your consent.

### **How do we safeguard personal information?**

We make every reasonable effort to ensure that member information is accurate and complete. We rely on our members to notify us if there is a change to their personal information that may affect their relationship with our company. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible.

In some cases we may ask for a written request for correction.

We protect member personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information.

We will notify the Office of the Information and Privacy Commissioner of Alberta, without delay, of a security breach affecting personal information if it creates a real risk of significant harm to individuals.

We retain member personal information only as long as is reasonable to fulfill the purposes for which the information was collected or for legal or business purposes.

We render member personal information non-identifying, or destroy records containing personal information once the information is no longer needed.

We use appropriate security measures when destroying member personal information, including shredding paper records and permanently deleting electronic records.

## **Access to records containing personal information**

Members of Deep Blue Athletics Ltd. have a right of access to their own personal information in a record that is in our custody or under our control, subject to some exceptions. For example, businesses are required under the *Personal Information Protection Act* to refuse to provide access to information that would reveal personal information about another individual. Organizations are authorized under the Act to refuse access to personal information if disclosure would reveal confidential business information. Access may also be refused if the information is privileged or contained in mediation records.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to the owners of Deep Blue Athletics Ltd. You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization.

You may also request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days, unless an extension is granted. We may charge a reasonable fee to provide information, but not to make a correction. We will advise you of any fees that may apply before beginning to process your request.

## **Questions and complaints**

If you have a question or concern about any collection, use or disclosure of personal information by Deep Blue Athletics Ltd., or about a request for access to your own personal information, please contact one of the Owners in the first instance:

Owners: Deanna Kibblewhite or Heather Rosenthal

Company Name: Deep Blue Athletics Ltd

Phone: 780-968-8848

Email: [info@deepblueathletics.com](mailto:info@deepblueathletics.com)

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta

Suite 2460, 801 - 6 Avenue, SW

Calgary, Alberta T2P 3W2

Phone: 403-297-2728

Toll Free: 1-888-878-4044

E-mail: [generalinfo@oipc.ab.ca](mailto:generalinfo@oipc.ab.ca) Website: [www.oipc.ab.ca](http://www.oipc.ab.ca)