Privacy Policy

1. Purpose

Stella Rossa Football Club ("the Club") is committed to protecting the privacy and confidentiality of personal information in accordance with the Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable provincial privacy legislation deemed substantially similar.

This policy outlines how the Club collects, uses, discloses, safeguards, retains, and deletes personal information of members, participants, staff, volunteers, and stakeholders.

2. Scope

This policy applies to all personal information collected, stored, or processed by the Club in any form (electronic, paper, or verbal), including information related to:

- Players and parents/guardians
- Coaches, referees, staff, and volunteers
- Donors, sponsors, and partners

3. Definitions

- **Personal Information**: Any information about an identifiable individual, such as name, contact details, date of birth, health information, or financial data.
- Consent: Voluntary agreement to the collection, use, or disclosure of personal information. Consent may be explicit or implied, depending on the sensitivity of the information and the circumstances.
- Collection: Gathering, acquiring, or obtaining personal information from any source.
- Use: Processing or applying personal information for purposes identified by the Club.
- **Disclosure**: Making personal information available to others outside the Club.

4. Principles of Privacy

The Club adheres to the 10 principles of fair information practices under PIPEDA:

- a) **Accountability**: The Club appoints a Privacy Officer to oversee compliance with this policy.
- b) **Identifying Purposes**: The Club will clearly state why personal information is being collected at or before the time of collection.

- c) **Consent**: Consent will be obtained for the collection, use, or disclosure of personal information, except where permitted or required by law.
- d) **Limiting Collection**: Only the personal information necessary for identified purposes will be collected.
- e) **Limiting Use, Disclosure, and Retention**: Personal information will only be used or disclosed for the purpose it was collected and will be retained only as long as necessary.
- f) Accuracy: Personal information will be kept accurate, complete, and up to date.
- g) **Safeguards**: Appropriate security measures (physical, technical, and administrative) will protect personal information against loss, theft, or unauthorized access.
- h) **Openness**: The Club will make information about its privacy practices available upon request.
- i) **Individual Access**: Individuals have the right to access their personal information and request corrections.
- j) **Challenging Compliance**: Concerns about the Club's compliance with this policy can be addressed to the Privacy Officer.
- 5. Collection, Use, and Disclosure of Information

The Club collects personal information for purposes including:

- Registration and participation in Club programs and activities
- Communication with members, parents/guardians, staff, and volunteers
- Compliance with governing body (Canada Soccer, Ontario Soccer) requirements
- Emergency and medical contact purposes
- Processing payments, sponsorships, and donations
- Promotion of Club programs and achievements (with consent for images/media)

The Club may disclose personal information to:

- Governing soccer organizations (e.g., Ontario Soccer, Canada Soccer) for registration and insurance purposes
- Service providers (e.g., registration platforms, tournament organizers) with contractual privacy safeguards
- Emergency medical services when necessary for health and safety
- Law enforcement or other authorities as required by law
- 6. Safeguards

- **Physical**: Locked offices, secure storage of paper records
- Technical: Password-protected systems, encryption, restricted access
- Administrative: Staff/volunteer training on privacy and confidentiality

7. Retention, Deletion, and Disposal

- Personal information will be retained only as long as necessary to fulfill the purposes for which it was collected, or as required by law and governing body regulations.
- Once personal information is no longer required, the Club will securely delete or destroy it in a manner that prevents unauthorized access, including:
 - Electronic Records: Permanent deletion from systems, backup servers, and databases.
 - Paper Records: Cross-cut shredding or secure destruction by a certified disposal service.
- Individuals may request deletion of their personal information in writing to the Privacy Officer. The Club will review requests on a case-by-case basis, ensuring compliance with legal, regulatory, and insurance retention requirements.
- Where immediate deletion is not possible (e.g., due to legal or accounting obligations), data will be securely archived and access strictly limited until it can be deleted.

8. Access and Correction

Individuals may request access to their personal information held by the Club. Requests should be submitted in writing to the Privacy Officer. Corrections will be made where information is found to be inaccurate or incomplete.

9. Roles and Responsibilities

- **Privacy Officer**: Ensures compliance with this policy and responds to inquiries or complaints.
- **Staff and Volunteers**: Must follow this policy and report any privacy breaches immediately.
- **Board of Directors**: Provides oversight and accountability.

10. Breach Response

In the event of a privacy breach:

- The Privacy Officer will assess the risk of harm.
- Affected individuals will be notified as required by law.
- Corrective actions will be taken to prevent recurrence.
- Where applicable, the Office of the Privacy Commissioner of Canada (or provincial authority) will be informed.



11. Contact Information

Questions, requests for access, or complaints about privacy practices can be directed to:

Privacy Officer – Stella Rossa FC 200 Robert Speck Pkwy, #1206, Mississauga, ON, L4Z 1 S3 +1 647 365 1902 stellarossafc@outlook.com

12. Review and Updates

This policy will be reviewed annually and updated as necessary to ensure ongoing compliance with PIPEDA and applicable provincial legislation.