

Privacy Policy

of the Coast Sirens Artistic Swimming Club

Policy Number	PRI-001
Version	1.0
Adopted by	Board Resolution
Adoption date	May 14 th , 2026
Review cycle	Every 2 years, or sooner on material change
Owner	Board of Directors

1. Purpose

This Privacy Policy describes how Coast Sirens Artistic Swimming Club (the "Society" or "CSAS") collects, uses, discloses, retains, and safeguards personal information, and how individuals may access and correct personal information about themselves. It is designed to comply with the Personal Information Protection Act (British Columbia) ("PIPA") and with applicable requirements of BC Artistic Swimming (BCAS) and Canada Artistic Swimming (CAS).

2. Definitions

"Personal information" means information about an identifiable individual, but does not include the name, title, business address, or business telephone number of an employee of an organization. "Member" has the meaning given in the Bylaws. Other capitalized terms have the meaning given in the Bylaws.

3. Accountability

3.1 Privacy Officer. The Board has designated Peng Zhang as the Society's Privacy Officer. The Privacy Officer is responsible for the Society's compliance with this Policy and with PIPA. The Board may, by Board Resolution, change the designated Privacy Officer at any time.

3.2 Contact. The Privacy Officer may be reached at privacy@coastsirens.ca or by writing to the Society at its registered address.

4. Identifying Purposes

The Society collects personal information for purposes including:

- (a) registering athletes, coaches, officials, and volunteers with the Society and with BCAS/CAS;
- (b) delivering programs, including coaching, travel, and competition entry;
- (c) communicating with Members and participants;
- (d) processing payments and maintaining financial records;
- (e) complying with Safe Sport, screening, and insurance obligations;
- (f) promoting the Society and the sport, where consent has been obtained (for example, photo and video use);
- (g) conducting governance activities (votes, elections, meetings).

5. Consent

5.1 Collection with consent. The Society collects personal information with the knowledge and consent of the individual, except where collection without consent is authorized or required by law.

5.2 Form of consent. Consent may be express (for example, on the registration form) or implied from the context (for example, providing an email address for Society communications). For sensitive information (such as medical or screening information) and for public uses of photos or video, consent is obtained expressly.

5.3 Minors. Consent for collection, use, and disclosure of personal information of a minor is obtained from a Parent or legal guardian.

5.4 Withdrawal. An individual may withdraw consent at any time, on reasonable notice, subject to legal or contractual restrictions. The Society will inform the individual of the consequences (which may include inability to continue in a program).

6. Limiting Collection

The Society collects only the personal information reasonably necessary for the purposes set out in Section 4. Collection is done by fair and lawful means.

7. Limiting Use, Disclosure, and Retention

7.1 Use. Personal information is used only for the purposes for which it was collected, or for a consistent purpose, unless the individual consents to a new use.

7.2 Disclosure. The Society discloses personal information to:

- (a) BC Artistic Swimming and Canada Artistic Swimming, as required for registration, eligibility, and Safe Sport;
- (b) competition hosts, for athlete entry;
- (c) operators of pools, aquatic centres, schools, community centres, and other facilities where the Society delivers its programs, where the facility operator requires participant information for facility access, safety records, permits, insurance, or municipal recreation programming;
- (d) service providers (registration system, payment processor, accounting software, email and communications tools) under written contracts that require comparable privacy safeguards;
- (e) regulators, law enforcement, or child protection authorities where required or authorized by law;



- (f) an insurer or the Society's professional advisors, as necessary to manage risk or obtain advice.

7.3 Retention. Personal information is retained only as long as necessary to fulfill the purposes for which it was collected and to meet legal and regulatory obligations. The Society's standard retention schedule is:

- (a) registration and participation records: 7 years after last program participation;
- (b) financial records: 7 years (see Finance Policy Section 10);
- (c) screening records: for the duration of the CRC validity plus 2 years;
- (d) Safe Sport complaint and investigation records: 10 years after closure of the matter, or longer if required by BCAS/CAS or law;
- (e) governance records (minutes, resolutions): permanently.

7.4 Destruction. Personal information is destroyed, erased, or anonymized once it is no longer required.

8. Accuracy

The Society will make reasonable efforts to ensure that personal information is accurate and complete for the purposes for which it is used. Individuals are responsible for notifying the Society of changes to their personal information.

9. Safeguards

The Society protects personal information with administrative, technical, and physical safeguards appropriate to the sensitivity of the information, including:

- access controls on registration systems and financial software;
- restricting access to personal information on a need-to-know basis;
- confidentiality expectations for Directors, officers, coaches, and volunteers;
- secure storage of paper records containing personal information;
- use of service providers that offer comparable safeguards under written contract.

10. Openness

This Policy, together with the Privacy Notice, is made available on request and published on the Society's website. The Society's practices regarding personal information are described in a form that is easy to understand.

11. Access and Correction

11.1 Access requests. An individual may make a written request to the Privacy Officer to access personal information about themselves held by the Society.

11.2 Response time. The Society will respond to an access request within 30 business days, as required by PIPA, or provide notice of an extension on the grounds permitted by PIPA.

11.3 Correction. An individual may request correction of inaccurate or incomplete personal information. The Society will correct the information or, where a correction is not made, annotate the record with the requested correction.

11.4 Fees. A minimal fee may be charged for an access request, consistent with PIPA. The Society will advise the individual of any fee before processing the request.

12. Complaints

An individual who has a concern about the Society's handling of personal information may contact the Privacy Officer. If the concern is not resolved, the individual may contact the Office of the Information and Privacy Commissioner for British Columbia.

13. Cross-border Disclosure

Some service providers may store or process personal information outside British Columbia or Canada. Where this is the case, the Society will use contractual and other reasonable safeguards and will inform individuals at the point of collection.

14. Review

This Policy will be reviewed by the Board every 2 years, and sooner if PIPA, BCAS/CAS requirements, or the Society's practices change materially.