

The Ontario Lacrosse Association (OLA) is a not-for-profit amateur sport organization which is responsible for the administration of the sport of lacrosse in Ontario. While providing programs and services for athletes and volunteers to participate in the sport of lacrosse, the OLA may collect personal information from its members. This policy demonstrates the OLA's commitment to maintain the accuracy and confidentiality of all personal information collected from our members.

1. **The definition.** The OLA considers personal information to mean any information, recorded in any form, which may result in the identity of a member being inferred, determined or known. Information excluded from this policy includes business contact information (ie. name, title, business address, etc.) and aggregate data (information contributed by an individual where that individual's identity cannot be determined). The OLA retains the right to use business contact data and aggregate data in any way that it determines appropriate.
2. **The scope.** The OLA's Confidentiality Policy extends to staff members, Board of Governors, and all member association executives, representatives and officers who are responsible for receiving, storing, transmitting and/or destroying records related to an individual's membership and/or participation within the OLA. Information received by any individual acting on behalf of the OLA or its member associations is considered confidential and intended to be privileged. Where the disclosure of information occurs to an unauthorized individual or organization, the individual responsible for maintaining the personal information is required to immediately notify the OLA Executive Director of the situation in full detail through written communication. Where personal information is stored on the association-issued device of a staff member or representative of the Ontario Lacrosse Association, that device is required to be returned to the Executive Director prior to the termination of employment, contract or involvement. Where personal information is stored on the private device or in hard copy of a representative of the Ontario Lacrosse Association acting on behalf of the association or of a member association, that personal information is required to be deleted, destroyed, erased or otherwise removed by the end of the calendar year.
3. **The reasons.** The OLA may use the personal information (provided verbally, in writing or by electronic means) of its members to administer competition, track participation information, organize programs and/or services, manage relationships, communicate with members, meet legal and/or regulatory requirements or for any other purposes consistent with the mandate and/or mission of the organization. The OLA only collects personal information which would be considered reasonable for the purposes stated above in a fair and lawful manner. The personal information of OLA members is not sold, traded, bartered, exchanged or disclosed for consideration with anyone outside of the association. The OLA may disclose the personal information of its members to the Ministry of Tourism, Culture and Sport, to print and electronic media in connection with our programs and/or services, and individuals or OLA member associations in accordance for the sole purpose of providing programs and/or services to the OLA, its membership and/or partnering organizations, or where required by law. In addition to these situations, the disclosure of personal information may be justified or permitted to be disclosed without consent, including:
 - a. Where required by law or ordered by a court, administrative agency or governmental tribunal with jurisdiction over the OLA;
 - b. Where the OLA's Board of Directors believes that such action is necessary to protect the rights, privacy, safety and/or property of an identifiable person or group;
 - c. Where it is necessary to establish or collective monies owing to the OLA, or to pursue resolution or limit damages sustained by the OLA;
 - d. Where the information is already public.
4. **Gaining consent.** Unless required by law, no personal information is collected without first obtaining the consent of the individual (or parent/guardian of the individual) concerned to the collection of that information. The OLA may seek consent to use and disclose personal information after it has been collected in those cases where that information may be used for a purpose not identified in this policy or not previously identified for which the individual has previously consented. In most cases, members are free to refuse or withdraw consent at any time, although certain services can only be offered to members who provide personal information to the OLA. When consent to personal information is withdrawn at the written request of a member, that person will be notified of the consequences of the withdrawal of consent.

5. **Accuracy and retention.** The OLA endeavours to ensure that any personal information provided by its members is as accurate, current and complete as possible for the purposes in which that information is used. The length of time in which information is retained varies, depending on the nature of the information and its service or purpose. This period may extend beyond the termination of an individual's membership, but only so long as is necessary for the OLA to maintain sufficient information to respond to any issue that may arise at a later date. When an individual's personal information is no longer required by the OLA, it will be destroyed, deleted, erased or converted into an anonymous form.
6. **For our member's protection.** The OLA endeavors to maintain appropriate physical, procedural and technical security with respect to its offices and information storage facilities to prevent any loss, misuse, unauthorized access, disclosure or modification to a member's personal information. Access to personal information is restricted to those employees and volunteers that the staff and/or Board of Directors have determined need to know that information in order for the OLA to provide its programs, services or information. If an employee or individual acting on behalf of the OLA loses, misuses, grants unauthorized access to, discloses or modifies a member's personal information, action may be taken up to and including termination of any agreement between the OLA and that individual and/or organization.
7. **For our member's access.** The OLA permits the reasonable right to access and review personal information held by the association about an individual and will endeavor to provide the information in question within a reasonable time (generally no later than 30 days following the request). To guard against fraudulent requests for access, the OLA may require sufficient information to confirm that the person making the request is authorized to do so before granting and/or making corrections to the information. Where possible, the OLA will provide the personal information from our records in a form that is easy to understand. The OLA reserves the right to decline access to personal information where the information requested:
 - a. Would disclose personal information about another individual or about a deceased individual;
 - b. Is subject to solicitor-client or litigation privilege;
 - c. Is not readily retrievable and/or the burden or cost of providing the information may be disproportionate to the nature or value of the information;
 - d. Does not exist, is not held, or cannot be found by the OLA;
 - e. May harm or interfere with law enforcement activities and/or other investigative or regulatory functions of a body authorized by law;
 - f. Is requested to be withheld under applicable legislation.

Where information will not or cannot be disclosed, the individual making the request will be provided with the reasons for non-disclosure by the Executive Director.

8. **Resolving concerns about confidentiality.** In the event of questions or concerns related to access to personal information, the collection, use, management or disclosure of personal information, or any information contained within this policy, the OLA's Board of Directors will take reasonable steps to determine the merit of the concern, and if justified, the reasonable steps to resolve the issue.

In accordance with this Confidentiality Policy, the Ontario Lacrosse Association requires all employees and league/association representatives to handle all sensitive information in a confidential and appropriate manner. Any privileged position requires representatives to take reasonable precautions to safeguard the confidentiality of such information for the integrity of the Ontario Lacrosse Association and its members. Discipline may result from breaches for which an individual is found to be responsible.