



Personal Information Privacy Policy

VERSION HISTORY

August 15, 2023	Initial draft version approved by the Board.

INTRODUCTION

At the West Vancouver Tennis Club (“**Club**” or “**We**”) respect your privacy and are committed to protecting it by complying with this policy.

This policy describes:

- How we collect, use, disclose, and protect the personal information of our members, public participants and website users (“**You**”).
- Describe the types of information we may collect from you or that you may provide when you interact with the Club or visit the website wvwc.ca (our “**Website**”).
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.
- Our commitment to you, in compliance with and beyond the rules set out by the Personal Privacy Information Act (“**PIPA**”).

We will only use your personal information in accordance with this policy unless otherwise required by PIPA. We take steps to ensure that the personal information that we collect is accurate, relevant, not excessive, and used for limited purposes.

PIPA defines “personal information” as any information about an identifiable individual and includes employee personal information but does not include contact information or work product information. In general, it also means any information that is reasonably capable of identifying a particular individual either alone or when combined with information from other available sources.

This policy applies to information we collect, use, or disclose about you:

- On the Club Website and social media platforms.
- In email, text, and other electronic messages between you and the Club or the Club Website.



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- On paper forms and correspondence.
- Through mobile and desktop applications you download from the Website, which provide dedicated non-browser based interaction between you and the Website.

Please read this policy carefully to understand our policies and practices for collecting, processing, and storing your information.

If you do not agree with our policies and practices, your choice is not to use our online platforms and/or discontinue your membership. By accessing or using our online platforms and continuing your membership, you indicate that you understand, accept, and consent to the practices described in this policy.

Our online platforms may include links to third-party websites, plug-ins, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. If you follow a link to a third-party website or engage a third-party plugin, please note that these third-parties have their own privacy policies and we do not accept any responsibility or liability for these policies. We do not control these third-party websites, and we encourage you to read the privacy policy of every website you visit.

This policy may change from time to time (see Changes to our Privacy Policy). Your continued membership and use of our online platforms after we make changes indicates that you accept and consent to those changes, so please check the policy periodically for updates. We will maintain a current version of this policy on the Membership page of our Website.

DATA PROTECTION PRINCIPLES

We will always comply with PIPA and all applicable data protection law that states personal information we hold must be:

- Used lawfully, fairly, and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with these purposes.
- Relevant to the purposes that we have informed you about and limited to only those purposes.
- Accurate and kept up to date.
- Kept only as long as is necessary for the purposes we have informed you about.
- Kept securely.



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INFORMATION WE COLLECT ABOUT YOU

Depending on the circumstances (see “How we collect information about you”) we may collect, store, and use the following categories of personal information about:

- Personal contact details such as name, title, addresses, telephone numbers, and email addresses.
- Credit Card Information
- Technical Information, including your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, or information about your internet connection.

HOW WE COLLECT INFORMATION ABOUT YOU

We use different methods to collect your information, including through:

- Direct interactions with you when you provide it to us, for example, by filling in membership application forms or corresponding with us by phone, email, booking sessions or programs, purchasing or renewing membership or booking an event.
- From someone else acting on your behalf – for example where a parent or guardian has purchased a membership or class registration for a child.
- User contributions. You may also provide information for us to publish or display on public Website areas or transmit to third parties, for example, filling out feedback surveys.
- Automated technologies or interactions, as you navigate through our Website. Information collected automatically may include usage details and IP addresses.

HOW WE USE YOUR INFORMATION

We use information that we collect about you or that you provide to us, including any personal information:

- To process bookings or other resource bookings.
- Process coaching sessions, course and program bookings.
- Process membership transactions.
- Process event bookings.
- Set up and process tournament data.
- Set up coaches or volunteers to run coaching programs.
- To carry out our obligations and enforce our rights arising from any contracts with you, including for billing and collection or to comply with legal requirements.



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- To notify you about changes to our Website or any products or services we offer or provide through it.
- To improve our Website, products or services, marketing, or customer relationships and experiences.
- To allow you to participate in interactive features, social media, or similar features on our Website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

Pursuit of legitimate interests: In some cases, we may use your personal information to pursue legitimate interests of our own including commercial interests and those with a wider public benefit. For example, we may need to process personal data in pursuit of our legitimate interests to:

- Market our Club.
- Operate a customer services team and conduct surveys to improve our services.
- To make parts of the Website easier to use.
- Research and statistical analysis, for example, to review participation patterns.

WHO WE MAY DISCLOSE YOUR DATA WITH

Personal information collected and processed by the Club may be shared with the following recipients, or categories of recipients, where necessary:

- Someone acting on your behalf, for example a parent who has purchased membership, coaching class or programs for you as their child.
- Tournament organizers and officials involved in tournaments you are taking part in.
- Your venue, coach, or leader for the purposes of membership, booking a court or other resource or coaching program.
- Our suppliers where they process data on our behalf. For example, payment providers, email providers, and service providers.
- We will disclose information where authorized by PIPA or required by law (for example, in the event of a court order, subpoena, or search warrant).



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COOKIES

Information may be sent to your computer in the form of an Internet "cookie" to allow the Website servers to monitor your requirements. The cookie is stored on your computer. The Website server may request that your computer return a cookie to it. These return cookies do not contain any information supplied by you or any personally identifiable information about you.

Such measures are necessary to allow the Website to measure the usability of the systems, which will help in its continuing development to ensure that we understand the requirements of our users. Your browser software should however enable you to block cookies if you wish.

DATA SECURITY

We have put in place measures to protect the security of your information, for example to backup and protect the integrity of our electronic communications and data storage systems. Details of these measures are listed in Appendix A.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

HOW LONG WILL WE KEEP YOUR INFORMATION

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

BUSINESS TRANSFERS

In the case that the Club, or substantially all of its assets, were acquired user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of the Club may continue to use your personal information as set forth in this policy.



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CORRECTING YOUR PERSONAL INFORMATION

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes. By law you have the right to request access to and to correct the personal information that we hold about you. Please update your personal records for any changes on a timely basis.

RIGHTS OF ACCESS, ERASURE, AND RESTRICTION

Under certain circumstances by law you have the right to:

- Request access to your personal information (commonly known as “data subject access request.”) This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to correct any incomplete or inaccurate information we hold about you.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information we have no need to continue to hold it. You also have the right to ask for your personal information to be deleted where you have exercised your right to object to processing (see below).
- Object to processing of your information where we are relying on a legitimate interest and there is something about your particular situation which would cause you to object to processing. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. You have the right to suspend the processing of personal information about, if, for example, you want to establish the information’s accuracy or the reason for its processing.
- Request the transfer of your personal information to another party.

If you want to exercise any of the rights listed above or any request regarding your information, please write to us at the contact details below. You will not have to pay a fee to exercise any of these rights, but we may charge a reasonable fee if your request is clearly unwarranted or excessive. We do reserve the right to refuse to comply with the request in such circumstances, if necessary.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information.



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WITHDRAWING YOUR CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purposes, you have the right to withdraw your consent for that specific processing at any time. Once we have received notice that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

CHANGES TO OUR PRIVACY POLICY

If we make material changes to how we handle our users' personal information this policy will be updated on the Membership page of our Website. Please check the policy periodically for updates. A version history will be provided on the first page.

CONTACT INFORMATION AND CHALLENGING COMPLIANCE

We welcome your questions, comments, and requests regarding this privacy policy and our privacy practices. We have procedures in place to receive and respond to complaints or inquiries about our handling of personal information, our compliance with this policy, and with applicable privacy laws. Please contact us at:

Sandy Sutton sandy@wvtc.ca
Club Manager 604-922-9733

821 – 21st Street
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APPENDIX A

Measures in place at the Club to protect its data as of August 1, 2023:

- Strong Passwords: the computers at the Front Desk, Coaches' office and upstairs office all have complex passwords. The network equipment and administrative accounts also have secure passwords.
- Two-Factor Authentication (2FA): Administrative email accounts have 2FA enabled.
- Regular Software Updates: Updates are automatic on club computers.
- Firewall: There is a firewall in place at the Club.
- Secure Wi-Fi: The wifi is secure and uses an enterprise management system with different networks for different levels of network access.
- Data Backup: Backups are in place and on the new installs, a cloud backup is enabled.
- Restricted User Access: Coach and Front Desk computers have limited access to Administrative functions so that personnel only have access to regular office tasks.
- Physical Security: The Manager's office is locked, and her computer is locked to the table. While anything locked can be physically overcome with enough force, it may deter or impede someone who attempts to remove the computer.
- Secure Cloud Services: The Club is using a reputable provider, Microsoft, with available security offerings.
- Secure Disposal: Our IT service provider wipes the data from old drives before recycling them.