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## PRIVACY POLICY

This is the privacy policy of the Alberta Artistic Swimming Association, an Alberta society (the “AAS”). References herein to “we”, “our” or “us” are references to the AAS. References herein to “you” or “your” are references to an individual reviewing this privacy policy in anticipation of providing, or having already provided, personal information to the AAS.

Privacy of personal information is an important principle to the AAS. We are committed to collecting, using and disclosing your personal information responsibly and only to the extent necessary to deliver our programs and services and facilitate membership registration for our organization and Canada Artistic Swimming (the “CAS”).

A. What is personal information?

Personal information is information about an identifiable individual. Personal information includes information that relates to an individual's personal characteristics (e.g., gender, age, ethnicity, home address, phone number, email address or family status), their health (e.g., physical limitations) or their activities. Personal information does not include information that cannot be attributed to an identifiable individual, such as information of an aggregate or anonymous nature.

B. Who we are

The AAS is primarily engaged in the recruitment, development and retention of athletes wishing to participate in the sport of artistic swimming, both in recreational and competitive settings. To achieve these objectives, we provide support to our member clubs, develop programming for the training of coaches, volunteer officials and athletes, as well as advocating for the value of sport before various levels of government.

Our operations are managed, and our programming and services are delivered, by AAS staff members, coaches, contract personnel, volunteers, and our dedicated board of directors. Each of these individuals may, in the course of their duties, have access to your personal information.

C. What types of personal information do we collect?

The AAS collects and maintains the following types of information about our participants:

1. Personal information, including:
  - (a) contact information, such as name, address, email and telephone number;
  - (b) information on events attended and publications received;
  - (c) demographic information including age and gender;
  - (d) health information, such as provincial health care number and medical/health information pertinent to participation in the sport of artistic swimming; and
  - (e) information disclosed as part of personal background checks the AAS conducts to verify the suitability of an AAS coach, official or volunteer.

2. Non-personal information that does not personally identify a participant, including information that is anonymized, aggregated or publicly available when not combined with non-publicly available information about a participant.
3. Information about a participant's or other individual's equipment, browsing action and patterns, including information automatically collected through technical methods such as:
  - (a) **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of a computer. A user may refuse to accept browser cookies by activating the appropriate setting on the user's browser. However, if a user selects this setting the user may be unable to access certain parts of our website. Unless the user has adjusted the user's browser settings so that it will refuse cookies, our system will issue cookies when the user directs the user's browser to our website.
  - (b) **Flash cookies.** Certain features of our website may use local stored objects to collect and store information about a user's preferences and navigation to, from and on our website. Flash cookies are not managed by the same browser settings as are used for browser cookies.
  - (c) **Web beacons.** Pages of our website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit the AAS, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

D. Why we collect personal information

Appended to this privacy policy is a listing of the purposes for which we collect personal information (collectively, the "**Purposes**").

E. How do we collect personal information?

Generally, we only collect personal information when such information is provided to us by you, through registrations, completion of forms or e-mails, coincident with participation in a program, event or other activity organized, administered, or supported by the AAS.

If you interact with our website or other digital features, we may automatically collect certain data about you.

F. How do we use personal information?

We use personal information for the Purposes.

G. Do we share or disclose personal information?

The AAS may share and disclose personal information in the following circumstances:

1. **Legal requests and obligations.** In order to comply with any applicable legal obligation including a regulatory process, or an order of a government institution, investigative body, regulatory body or judicial authority of competent jurisdiction.
2. **Service providers.** To our third-party service providers to help us in carrying out the purposes described in the appendix to this privacy policy.
3. **Expressed directions.** To comply with directions or any additional consents provided to us by an individual from whom we have collected personal information.
4. **Business transactions.** As a result of, or in connection with, a merger, consolidation, transfer of assets, reorganization, or other business transaction.
5. **Regulatory, disciplinary and governance matters.** Personal information is shared with CAS in order to facilitate certain registrations with that organization and may be disclosed in the context of a disciplinary matter or in order to carry out a required regulatory or governance function.

We disclose non-personal information to third parties as reasonably necessary to meet our administrative needs. We do not disclose your personal information to third parties for their own direct marketing purposes without your consent.

H. Where do we store the personal information we collect?

Our database of personal information remains at the offices of the AAS and with data processors or servers acting on our behalf and responsible to us. Where the AAS holds personal information in a physical form, such information is stored at the offices of the AAS in a locked cabinet, and access to that cabinet is restricted to AAS's Executive Director.

Some of this data may be stored or processed at computers located in other jurisdictions, such as the United States, whose data protection laws may differ from Canadian laws. Subject to applicable laws in such other jurisdictions, we will ensure that appropriate protections are in place to require the data processor in that jurisdiction to maintain protections on the data that are equivalent to those that apply in Canada.

I. How long do we maintain the personal information that we collect?

We only retain personal information for so long as is reasonably necessary to enable your participation in AAS and CAS programs, events and activities except where otherwise provided by law (e.g. in connection with pending or extant litigation).

J. How is my personal information kept secure?

AAS uses technical and organizational security precautions to protect the personal information we collect from manipulation, loss, destruction or unauthorized access, use, disclosure or alteration. Third parties that process personal information on our behalf are contractually obligated to safeguard personal information and only use the information provided to them for the Purposes.

Our security procedures are regularly reviewed and revised based on new technological developments.

K. Children

In light of the importance of protecting children's privacy, we do not collect, process or use on our website and personal information relating to an individual whom we know to be under 13 years old without the prior, verifiable consent of his or her legal representative. Such legal representative has the right, upon request, to view the personal information provided by the child and/or to require that it be deleted.

L. Your options

1. **Access and update your information.** You have the right to review and amend any of your personal information stored by us. Please send any such request to the AAS's Privacy Officer in accordance with the contact information set out in Section M below. We will provide you with access to your personal information that is in our possession, subject to certain exceptions, including data that is referenced to another individual's personal information that we cannot sever, or information subject to solicitor-client privilege, or other legal or confidentiality restrictions that may prevent us from fulfilling your access request.
2. **Right of cancellation.** You have the right at any time to withdraw your consent to the use of your personal information in the future. Please send any such cancellation request to the AAS's Privacy Officer in accordance with the contact information set out in Section M below.

M. Contact us

If you wish to know what information AAS has in our files about you, ask a question about the information in your file or request a change to the information in your file, please contact:

Melanie Thompson  
Acting Executive Director and Privacy Officer  
Alberta Artistic Swimming  
11759 Groat Road  
Edmonton, Alberta T5M 3K6  
Telephone: 780-415-1789  
Email: mthompson@albertaartisticswimming.ca

**Appendix**  
*Purposes*

Canadian law requires that the AAS only collect, use, or disclose personal information for purposes that are reasonable. The AAS collects and uses personal information for the following purposes (list is non-exhaustive):

1. **Communications**

- (a) Sending communications in the form of e-news or newsletters, or posting to social media, with content related to AAS programs, events, achievements, fundraising, activities, discipline decisions, appeals of discipline decisions and other pertinent information.
- (b) Publishing articles, media relations content and related postings on the AAS website, AAS displays and AAS posters.
- (c) Award nominations, biographies, and related media relations.
- (d) Internal AAS communications and other communications among AAS personnel and AAS members.

3. **Sales, Promotions and Merchandising**

- (a) Purchasing equipment, coaching manuals, related resources and other products.
- (b) Promotion and sale of merchandise.

2. **Registration, Database Entries and Monitoring**

- (a) Registration of participants, coaches, officials and volunteers in programs, events, and activities with both the AAS and the CAS.
- (b) Database entries with the Coaching Association of Canada and the confirmation of coaching qualifications and the selection of coaches.
- (c) Database entries to confirm officiating qualifications.
- (d) Determination of participation eligibility, age groupings and appropriate levels of competition for participants.
- (e) Sizing and outfitting uniforms for participants and ancillary components of participant and team selection.
- (f) Technical monitoring, training of officials, preparing educational materials, promoting the sport of artistic swimming and other related media publications.

4. **General**

- (a) Travel arrangements and ancillary administration.
- (b) The implementation of AAS policies related to training, certification, sanctioning, discipline decisions or appeals of the same.
- (c) Medical emergency, emergency contact information and reports relating to medical or emergency issues.
- (d) Analyses and determinations of AAS membership demographics and programming needs and demands.
- (e) Managing complaints, disciplinary matters, insurance claims and insurance investigations.

- (f) Video recordings and photographs for use by AAS members and participants (for personal use).
- (g) Administration for payroll, honorariums, insurance policies and health care plans.