

# KN Privacy Policy



At Kawartha Nordic ("KN"), protecting your privacy and the confidentiality of your personal information has always been an important aspect of our operations. As a club with members and educational programs, the collection and use of our skiers' and their families' personal information is often fundamental to our day-to-day business operations.

We strive to provide you with excellent service. To us, that includes treating your personal information fairly and with respect. Each employee and representative of KN must abide by our commitment to privacy in the handling of personal information.

## **What is Personal Information?**

Personal information, as defined by the applicable law, is any piece of information, either factual or subjective, about an identifiable individual. However, personal information does not include the name, title, or business contact information (e.g., mailing address, email address, or business telephone number) of an employee of KN.

## **Accountability**

At KN, we take our commitment to securing privacy very seriously. Each employee and representative of KN is responsible for the personal information under his or her control and he or she has access only to the personal information needed to perform his or her function. Our employees are informed about the importance of privacy and receive information periodically to update them about our Privacy Policy and related policies.

In addition to establishing this Privacy Policy, we have appointed a member of our Board of Directors (see contact information below) as the KN Chief Privacy Officer. The Chief Privacy Officer is responsible for analyzing all personal information handling practices at KN and ensuring that our privacy policy is up-to-date and in force at all times.

## **Identifying Purposes: Why We Collect Information**

Unless the purpose is self-evident, KN will identify the purposes for which personal information is collected about you or a member of your family, either at that time or earlier. We will limit the information we collect to what we need for those purposes, and we will use it only for those purposes. We will obtain your consent if we wish to use such information for any other purpose.

Primarily, we ask you for information to establish and maintain a relationship.

If you or a member of your family are a KN program participant, we also ask for information to provide the best possible educational services to you. Please note that we will retain your personal information even after you or your family member are no longer attending KN programs, in order to maintain our relationship with your family and to be able to comply with applicable laws.

We obtain most of our information about you and your family members directly from you.

## **Consent**

We seek and confirm your consent to use your or your family's personal information at the time of collection or in advance. We will endeavour to employ clear, understandable language when we obtain your consent.

Usually, your consent is expressed verbally or in writing. Sometimes consent may be implied. In some cases, you may provide it electronically. Written consent includes completing and signing an application or other document pertaining to KN, Cross Country Ski Ontario (XCISO) or Nordiq Canada. "Signing" includes electronically accepting or consenting to a document by clicking an "I Accept" button, by using (or not using) a check-off box, by typing "Agree" or by some similar indicator contained in the user interface of an electronic document or form system. Implied consent may also be given, depending on circumstances and the sensitivity of the personal information involved.

The choice to provide us with personal information is always yours. Upon request, we will explain your options of refusing or withdrawing consent to the collection, use and release of personal information, and we will record and respect your written choices. However, your decision to withhold particular details may limit the services we are able to offer. In some cases, full disclosure of certain personal details is required by KN in order to provide our services. These situations are clearly noted, and most often pertain to safety and the programs offered.

Please note that your use of certain services provided by KN implies agreement with the Terms of Use of that service and consent to the collection and use of personal information as mentioned in the Terms of Use for that service. For example, this includes KN's registration service provided by Zone4. If you do not wish to provide consent, do not use the service.

## **Privacy and the Internet**

KN may collect user information from any of its websites (for example, via a username, an IP address or cookies, which are alphanumeric identifiers transmitted from our website to a visitor's browser and then back to our website unchanged). This information is used solely for enabling us to provide you with a customized online experience and to find ways to improve our site. Although cookies are widely used, it may be possible to disable cookies via your browser settings. However, in so doing, the website may not function properly or optimally.

KN's websites may contain links to other third-party websites that are not governed by this privacy policy. Although we endeavour to link only to websites with good privacy standards, our Privacy Policy will no longer apply once you leave the KN website.

## **Limiting Collection**

Information is not collected by KN without a specific, limited requirement. We collect information by fair and lawful means.

## **Limiting Use, Disclosure, and Retention**

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with your consent or as required or permitted by law.

It will be retained only as long as necessary for these purposes or as required by law.

## **Accuracy**

KN will make reasonable efforts to keep your personal information as accurate, complete and up-to-date as necessary for the purposes for which it is to be used. As we obtain most of our information about you and your family members directly from you, we rely on you to disclose correctly all personal information and to inform us of any relevant changes.

## **Safeguards: Protecting Your Information**

KN will protect your information with security safeguards appropriate to the sensitivity of the information, including through the use of physical measures (e.g., locks, shredders), electronic measures (e.g., passwords, encryption) and procedural measures (e.g., restricting access based on need, staff training).

## **Openness: Keeping You Informed**

KN has prepared this plain-language Privacy Policy to keep you informed. If you have any additional questions or concerns about privacy, we invite you to contact us by phone, mail, email or via our website, and we will address your concerns to the best of our ability.

## **Providing Individual Access**

KN will give you access to the information we retain about you within a reasonable time, with a written request, satisfactory identification and proof of entitlement. This includes how the information has been collected, how it is being used and to whom it may have been disclosed, except where the disclosure has been to a governmental body or Service Provider to KN for routine purposes.

In some cases, permitted by law, we may not provide access to personal information within our possession or control. Some examples of this include when personal information is protected by privilege, where disclosure would reveal confidential KN information or personal information of a third-party, or where it would be too costly, in KN's determination, to retrieve.

If we deny your individual request for access to your personal information, we will advise you in writing of the reason for the refusal and you may then challenge our decision.

## **Respecting and Responding to Your Privacy Concerns**

KN encourages you to contact us with any questions or concerns you might have about your privacy or our Privacy Policy. We will investigate and respond to your concerns about any aspect of our handling of your information.

In most cases, an issue is resolved simply by telling us about it and discussing it. If, after contacting KN, you feel that your concerns have not been addressed satisfactorily, please contact the KN Chief Privacy Officer.

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This Policy is subject to Canada's Personal Information Protection and Electronic Documents Act ("PIPEDA") and/or any other applicable privacy laws and KN reserves the right to change this Privacy Policy at any time.