

PRIVACY POLICY OF LIONS GATE FOOTBALL CLUB



Purpose

As a non-profit organization incorporated in British Columbia, Lions Gate Football Club (the "Club") is governed by BC's Personal Information Protection Act ("PIPA"). PIPA sets out rules for how organizations collect, use and disclose personal information.

This policy, in compliance with PIPA, outlines the principles and procedures the Club follows to protect the personal information of third parties in the course of its operations. The Club is committed to being accountable for how it handles personal information, ensuring the accuracy, confidentiality and security of such information.

This policy deals with personal information about members, including players, directors, coaches, assistant coaches, team managers and other volunteers.

A copy of the Club's policy is available upon request.

Personal Information

Personal information is information that is reasonably capable of identifying a particular individual either alone or when combined with information from other available sources. This information includes information that relates to personal characteristics (gender, age, home address, phone number, etc.), health (health history, health conditions, etc.) and competitive performance (player evaluations, competition history, etc.). Personal information does not include business contact information or work product information.

Purposes

Personal information will only be collected, used and disclosed by the Club that is necessary to fulfill the purpose of the collection. Personal information that may be collected, used or disclosed includes, but is not limited to, the following:

- a) Name, address, phone number and e-mail address for the purpose of emergency contacts, receiving communications from the Club and to register for various soccer activities, including league and tournament participation.
- b) Player information including height, weight, shoe size, uniform size, coach feedback and performance results for the purpose of outfitting uniforms, athlete evaluation and team selection.
- c) Video footage and photographs of individuals at competitions and practices for the purpose of technical evaluation, coach review, training, media publications and posting on the Club's website and social media.
- d) Competitive results, including goals scored, assists, clean sheets, yellow card and red card accumulation and discipline history for the purpose of tracking player and team performance.
- e) Name and contact information of directors, coaches, assistant coaches, team managers and other volunteers for the purpose of facilitating communication between Club volunteers.

Consent

The Club will obtain individuals' consent to collect, use or disclose their personal information, except when it is legally authorized or required by law to do so without consent. The Club usually collects personal information directly from individuals when they voluntarily provide this information in the course of communicating with the Club online or in-person.

The Club may collect, use or disclose personal information without consent as permitted by PIPA, including in the following circumstances:

- a) Personal information is collected by observation of a public sporting event at which the person appears voluntarily.
- b) The information is necessary to determine an individual's suitability for an athletic position.
- c) The collection, use or disclosure is necessary for the medical treatment of the individual and the individual is unable to give consent.
- e) The collection, use or disclosure of the information is clearly in the interests of the individual and consent cannot be obtained in a timely way.

f) The collection, use or disclosure of the information is required or authorized by law.

By providing personal information to the Club, and participating in its soccer activities, individuals are considered to have consented to the use of the information in the manner and for the purposes identified in this policy.

The Club will not require consent beyond what is necessary to provide a product or service.

An individual may withdraw consent to the collection, use or disclosure of personal information at any time by giving the Club reasonable notice, unless withdrawing consent would frustrate the performance of a legal obligation. The Privacy Officer will advise the individual of the likely consequences of withdrawing consent. If consent is withdrawn, the individual may not be able to continue their participation in certain soccer activities.

Limiting Use, Disclosure and Retention

The Club will not collect, use or disclose personal information except for the identified purposes for collection, unless it has received additional consent or the processing is authorized without consent.

The Club will disclose personal information where authorized by PIPA or required by law.

If information is disclosed to a third party with consent from the individual, the Club will ensure that appropriate arrangements exist with the third party to limit use and disclosure.

Personal information will be retained for a minimum of one year after its last use by the Club. After that period of time has passed, the Club will securely destroy or anonymize personal information once it is no longer necessary to fulfill the identified purposes or any other legal or business purposes.

Accuracy

The Club will make reasonable arrangements to ensure that the personal information it collects, uses or discloses is accurate and complete. Individuals may request that the Club corrects any errors or omissions in their personal information that is under the Club's control. If the Club is satisfied that an individual's request

for correction is reasonable, it will correct the information and send the corrected information to each organization it was disclosed to during the year before the date the correction was made.

Safeguards

The Club is required to protect personal information under its control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks. The Club ensures appropriate security arrangements are in place to protect personal information from these risks, including physical, technological and operational security measures. Security arrangements include, but are not limited to, restricted physical access to documents, need-to-know access and technological measures including the use of passwords, encryption and firewalls.

Accountability

The Privacy Officer is responsible for ensuring the Club's compliance with this policy and PIPA. The Privacy Officer also handles personal information access requests and complaints.

Contact information for the Privacy Officer:

Josh Zadeiks
Email: josh@lionsgatefc.com
Phone: (604) 442-5272

Individual Access

Individuals have the right to access their personal information, information about the ways in which their personal information is or has been used and the names of the individuals and organizations to which their personal information has been disclosed.

All requests for access must be made in writing, and individuals may be required to prove their identity before access to their personal information is provided.

Requested information will be provided at no cost to the individual, or at nominal costs relating to photocopying expenses, if applicable. If nominal fees are charged for the production of personal information under the Club's control, a written estimate of the fees will be rendered prior to providing the information.

Requested information will be provided to the individual within 30 days of receipt of the written request, unless a time extension is granted under PIPA or the Club is authorized or required by PIPA to refuse access. If the Club is authorized or required by PIPA to refuse access, the Club will provide the individual with a written explanation, stating the reasons for refusal and outlining further steps that are available to the individual.

Challenging Compliance

An individual may challenge the Club's compliance with PIPA, by submitting a complaint in writing to the Privacy Officer.

Upon receipt of a written complaint, the Club will:

- a) Record the date the complaint is received.
- b) Acknowledge receipt of the complaint by way of email.
- c) Notify the Privacy Officer who will clarify the nature of the complaint and take the necessary steps to rectify the complaint.
- e) Notify the complainant of the outcome of the steps taken to rectify the complaint, including any amendments to policies and procedures.

If the Privacy Officer is unable to resolve the concern, the individual may also write to the Office of the Information and Privacy Commissioner for British Columbia.

Openness

The Club will make information about its policies and practices relating to personal information available upon request.

The Club may amend this policy at any time and reserves the right to make changes without notice.