

BRYST FOOTBALL ACADEMY

Privacy Policy

(Aligned with Canada Soccer Safe Sport and Club Licensing Standards)

1. Purpose

Bryst Football Academy ("Bryst") is committed to protecting the privacy and confidentiality of all personal information it collects, uses, and discloses during its operations.

This Privacy Policy ensures compliance with **Canada Soccer's Club Licensing and Safe Sport standards** and the **Personal Information Protection and Electronic Documents Act (PIPEDA)**, which governs how organizations in Canada must handle personal information.

The purpose of this policy is to:

- Ensure that personal information is collected, used, and protected responsibly.
- Promote transparency and trust among players, parents, coaches, and staff; and
- Uphold Bryst's commitment to ethical and lawful management of personal data.

2. Scope

This policy applies to all personal information collected by Bryst Football Academy from:

- Players and parents/guardians
- Coaches, staff, contractors, and volunteers
- Members, participants, and club affiliates
- Website users, registrants, and event attendees

It covers all personal information in any form—written, electronic, or verbal—that is collected, stored, or shared by Bryst.

3. Guiding Principles

Bryst's privacy practices are guided by the **ten fair information principles** established under PIPEDA:

- 1. Accountability
- 2. Identifying Purposes
- 3. Consent
- 4. Limiting Collection
- 5. Limiting Use, Disclosure, and Retention
- 6. Accuracy
- 7. Safeguards
- 8. Openness
- 9. Individual Access
- 10. Challenging Compliance

4. Collection of Personal Information

Bryst collects only the personal information necessary for the operation of its soccer programs, administration, and compliance with Canada Soccer requirements.

Examples of information collected include:

- Participant and parent/guardian names, addresses, phone numbers, and email addresses
- Date of birth, gender, and emergency contact information
- Medical information relevant to participation (e.g., allergies, conditions)
- Background screening results for staff and volunteers
- Coaching qualifications and certifications
- Photos or videos taken during Bryst activities (with consent)

Information is collected through registration forms, employment applications, consent forms, and other legitimate club processes.

5. Use of Personal Information

Personal information is used for purposes such as:

- Registering players and staff with Bryst, Ontario Soccer, and Canada Soccer
- Administering programs, leagues, tournaments, and events
- Communicating schedules, updates, and club information
- Ensuring participant safety and emergency response
- Managing payroll, human resources, and volunteer coordination
- Complying with Canada Soccer Safe Sport, screening, and insurance requirements

Personal information will not be used for purposes other than those identified at the time of collection unless consent is obtained or required by law.

6. Consent

Bryst obtains consent before collecting, using, or disclosing personal information, except where permitted or required by law.

Consent may be:

- **Express** (written, verbal, or electronic) for sensitive information such as medical data or image use; or
- Implied for routine administrative purposes when registering for Bryst programs.

Individuals may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice.

7. Disclosure of Personal Information

Personal information may be shared only with:

- Ontario Soccer and Canada Soccer, for registration and compliance purposes.
- Governing bodies, insurers, and service providers as required to operate club programs.
- Law enforcement or child protection authorities when legally obligated.
- **Emergency personnel** when necessary to protect health or safety.

Bryst does not sell, trade, or rent personal information under any circumstances.

8. Safeguarding Personal Information

Bryst employs appropriate **physical**, **administrative**, **and technological safeguards** to protect personal information from loss, theft, unauthorized access, disclosure, or misuse.

Examples include:

- Secure storage of paper files in locked cabinets
- Password-protected electronic databases
- Limited access to personal data by authorized personnel only
- Regular review of data security measures

Staff and volunteers are trained in privacy practices and confidentiality obligations.

9. Accuracy and Retention

Bryst strives to ensure personal information is accurate, complete, and up to date. Information is retained only as long as necessary to fulfill the purposes for which it was collected and to comply with legal, regulatory, and insurance requirements.

Outdated or unnecessary information will be securely destroyed, erased, or anonymized.

10. Access to Personal Information

Individuals have the right to access their personal information held by Bryst and to request correction if it is inaccurate or incomplete.

Requests must be made in writing to the Bryst Privacy Officer.

Bryst will respond within a reasonable timeframe and in accordance with PIPEDA.

11. Photography, Video, and Media

Bryst may take photos or videos during training sessions, games, and events for promotional, educational, or reporting purposes.

- Participants and parents will be informed and may opt out of media use by notifying Bryst in writing.
- No identifying information (e.g., names, addresses) will accompany images without explicit consent.

12. Website and Digital Privacy

Bryst's website and online platforms comply with applicable privacy standards.

- Cookies or analytical tools may be used to improve website functionality.
- Online registration systems are encrypted and secure.

Email communications will comply with Canada's Anti-Spam Legislation (CASL).

13. Accountability and Compliance

Bryst Football Academy has appointed a **Privacy Officer** responsible for overseeing compliance with this policy and all privacy-related legislation.

Questions, concerns, or complaints about privacy practices can be directed to:

Privacy Officer - Bryst Football Academy

Email: [info@brystsoccer.com]

If a privacy concern is not resolved internally, individuals may contact the **Office of the Privacy Commissioner of Canada** at www.priv.gc.ca.

14. Review and Continuous Improvement

This Privacy Policy will be reviewed annually or as required to remain compliant with:

- Canada Soccer's Safe Sport and Club Licensing Standards
- Ontario Soccer policies and practices
- Federal and provincial privacy laws

15. Approval and Implementation

This Privacy Policy was reviewed and approved by the Bryst Football Academy Board of Directors