



Privacy Policy

Version:	May 20, 2026
Approved by Board of Governors:	June 22, 2026
Scheduled Review Date:	June 30, 2027

Definitions

1. [Defined terms](#) used in the Privacy Policy include:

- | | |
|--------------------------------|---|
| a) <i>Athletes</i> | g) <i>Minors</i> |
| b) <i>Complainant</i> | h) <i>Organization(s)</i> |
| c) <i>Commercial Activity</i> | i) <i>Organizational Participant(s)</i> |
| d) <i>Days</i> | j) <i>Personal Information</i> |
| e) <i>Harass or Harassment</i> | k) <i>Representative(s)</i> |
| f) <i>IP Address</i> | l) <i>Sport Integrity Canada (SIC)</i> |

General

2. Background – Privacy of *Personal Information* is governed by the federal *Personal Information Protection and Electronics Documents Act* ("PIPEDA" or the "Act"). This policy describes the way that the Curling Canada collects, uses, safeguards, discloses, and disposes of *Personal Information*, and states Curling Canada's commitment to collecting, using, and disclosing *Personal Information* responsibly. This policy is based on the standards required by PIPEDA and Curling Canada's interpretation of these responsibilities.
3. Purpose – The purpose of this policy is to govern the collection, use and disclosure of *Personal Information* during commercial activities in a manner that recognizes the right to privacy of *Organizational Participants* with respect to their *Personal Information* and the need of the *Organization(s)* to collect, use or disclose *Personal Information*.

Application of this Policy

4. Application – This Policy applies to *Representatives* in connection with *Personal Information* that is collected, used, or disclosed during any *Commercial Activity* related to Curling Canada.
5. Ruling on Policy – Except as provided in the *Act*, the Board of Governors of Curling Canada will have the authority to interpret any provision of this Policy that is contradictory, ambiguous, or unclear.

Obligations

6. Statutory Obligations – Curling Canada is governed by the *PIPEDA* in matters involving the collection, use and disclosure of *Personal Information*.
7. Additional Obligations – In addition to fulfilling all requirements of the *Act*, Curling Canada and its *Representatives* will also fulfill the additional requirements of this Policy. *Representatives* of Curling Canada will not:
 - a) Disclose *Personal Information* to a third party during any business or transaction unless such business, transaction or other interest is properly consented to in accordance with this Policy;
 - b) Knowingly place themselves in a position where they are under obligation to any organization to disclose *Personal Information*;
 - c) In the performance of their official duties, disclose *Personal Information* to family members, friends or colleagues, or to organizations in which their family members, friends or colleagues have an interest;
 - d) Derive a benefit for themselves or others from *Personal Information* that they have acquired during the course of fulfilling their duties with Curling Canada; or
 - e) Accept any gift or favour that could be construed as being given in anticipation of, or in recognition for, the disclosure of *Personal Information*.

Accountability

8. Privacy Officer – The Privacy Officer is responsible for the implementation of this policy and monitoring information collection and data security and for ensuring that all staff receives appropriate training on privacy issues and their responsibilities. The Privacy

Officer also handles *Personal Information* access requests and complaints. The Privacy Officer may be contacted as follows:

Curling Canada

Privacy Officer: Nolan Thiessen

1660 Vimont Court

Orleans, Ontario K4A 4J4

Tel: 613-834-2076 x125

Fax: 613-834-0716

Email: privacy@curling.ca

9. Duties – The Privacy Officer will:

- a) Implement procedures to protect *Personal Information*;
- b) Establish procedures to receive and respond to complaints and inquiries;
- c) Record all persons having access to *Personal Information*;
- d) Ensure any third-party providers abide by this Policy; and
- e) Train and communicate to staff information about Curling Canada's privacy policies and practices.

10. Employees – Curling Canada shall be responsible to ensure that the employees, contractors, agents, or otherwise of Curling Canada are compliant with the *Act* and this Policy.

Identifying Purposes

11. Purpose – *Personal Information* may be collected from *Representatives* and prospective *Representatives* for purposes that include, but are not limited to, the following:

Communications:

- a) Sending communications in the form of e-news or a newsletter with content related to Curling Canada programs, events, fundraising, activities, discipline, appeals, and other pertinent information;

- b) Publishing articles, media relations and postings on Curling Canada website, displays or posters;
- c) Award nominations, biographies, and media relations;
- d) Communication within and between *Representatives*;
- e) Discipline results and long-term suspension list;
- f) Checking residency status; and
- g) Posting images, likeness or other identifiable attributes to promote Curling Canada.

Registration, Database Entry, and Monitoring:

- a) Registration of programs, events and activities;
- b) *S/C* Database and/or Public Registry entry;
- c) Database entry at the Coaching Association of Canada and to determine level of coaching certification coaching qualifications and coach selection;
- d) Database entry to determine level of officiating certification and qualifications;
- e) Determination of eligibility, age group and appropriate level of play/competition;
- f) *Athlete* Registration, outfitting uniforms, and various components of *Athlete* and team selection;
- g) Selection;
- h) Implementation of classification; and
- i) Technical monitoring, coach/club review, officials training, educational purposes, media publications, and sport promotion

Sales, Promotions, and Merchandising:

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

General:

- a) Travel arrangement and administration;
 - b) Implementation of Curling Canada's Sport Integrity Program inclusive of screening, education;
 - c) Medical emergency, emergency contacts or reports relating to medical or emergency issues;
 - d) Determination of Membership demographics and program wants and needs;
 - e) Managing insurance claims and insurance investigations;
 - f) Video recording and photography for personal use, and not commercial gain, by spectators, parents, and friends;
 - g) Video recording and photography for promotional use, marketing and advertising by Curling Canada; and.
 - h) Payroll, honorariums, company insurance and health plans.
12. Purposes not Identified – Curling Canada shall seek consent from individuals when *Personal Information* is used for *Commercial Activity* not previously identified. This consent will be documented as to when and how it was received.

Consent

13. Consent – Curling Canada shall obtain consent by lawful means from individuals at the time of collection and prior to the use or disclosure of this information. Curling Canada may collect *Personal Information* without consent where reasonable to do so and where permitted by law.
14. Implied Consent – By providing *Personal Information* to Curling Canada, *Organizational Participants* are consenting to the use of the information for the purposes identified in this policy.
15. Withdrawal – An individual may declare to the Privacy Officer in writing to withdraw consent to the collection, use or disclosure of *Personal Information* at any time, subject to legal or contractual restrictions. Curling Canada will inform the *Organizational Participant* of the implications of such withdrawal.

16. Legal Guardians – Consent shall not be obtained from individuals who are *Minors*, seriously ill, or mentally incapacitated and therefore shall be obtained from a parent, legal guardian or person having power of attorney of such an individual.
17. Exceptions for Collection – Curling Canada is not required to obtain consent for the collection *Personal Information* if:
 - a) It is clearly in the *Organizational Participant's* interests and consent is not available in a timely way;
 - b) Knowledge and consent would compromise the availability or accuracy of the information and collection is required to investigate a breach of an agreement or contravention of a federal, provincial or territorial law;
 - c) The information is for media or journalistic purposes; or
 - d) The information is publicly available as specified in the *Act*.
18. Exceptions for Use – Curling Canada may use *Personal Information* without the *Organizational Participant's* knowledge or consent only:
 - a) If Curling Canada has reasonable grounds to believe the information could be useful when investigating a contravention of a federal, provincial, territorial or foreign law and the information is used for that investigation;
 - b) For an emergency that threatens an individual's life, health or security;
 - c) Aggregate information for statistical or scholarly study or research;
 - d) If it is publicly available as specified in the *Act*;
 - e) Pursuant to the publication of sanctions imposed in accordance with Curling Canada's policies;
 - f) If the use is clearly in the individual's interest and consent is not available in a timely way; or
 - g) If knowledge and consent would compromise the availability or accuracy of the information and collection was required to investigate a breach of an agreement or contravention of a federal, provincial or territorial law.

19. Exceptions for Disclosure – Curling Canada may disclose *Personal Information* without the individual's knowledge or consent only:
- a) To a lawyer representing Curling Canada;
 - b) To collect a debt the individual owes to Curling Canada;
 - c) To comply with a subpoena, a warrant or an order made by a court or other body with appropriate jurisdiction;
 - d) To a government institution that has requested the information, identified its lawful authority, and indicated that disclosure is for the purpose of enforcing, carrying out an investigation, or gathering intelligence relating to any federal, provincial, territorial or foreign law; or that suspects that the information relates to national security or the conduct of international affairs; or is for the purpose of administering any federal, provincial or territorial law;
 - e) To an investigative body named in the *Act* or government institution on Curling Canada's initiative when Curling Canada believes the information concerns a breach of an agreement, or a contravention of a federal, provincial, territorial, or foreign law, or suspects the information relates to national security or the conduct of international affairs;
 - f) To an investigative body for the purposes related to the investigation of a breach of an agreement or a contravention of a federal, provincial or territorial law;
 - g) In an emergency threatening an individual's life, health, or security (Curling Canada must inform the individual of the disclosure);
 - h) Aggregate information for statistical, scholarly study or research;
 - i) To an archival institution;
 - j) 20 years after the individual's death or 100 years after the record was created;
 - k) If it is publicly available as specified in the regulations; or
 - l) If otherwise required by law.

Limiting Collection, Use, Disclosure and Retention

20. Limiting Collection, Use and Disclosure – Curling Canada shall not collect, use or disclose *Personal Information* indiscriminately. Information collected will be for the purposes specified in this Policy, except with the consent of the individual or as required by law.
21. Retention Periods – *Personal Information* shall be retained as long as reasonably necessary to enable participation in Curling Canada, to maintain accurate historical records and/or as may be required by law.
22. Destruction of Information – Documents shall be destroyed by way of shredding and electronic files will be deleted in their entirety.

Safeguards

23. Safeguards – *Personal Information* shall be protected by security safeguards appropriate to the sensitivity of the information against loss or theft, unauthorized access, disclosure, copying, use or modification.

Breaches

24. Breaches – Curling Canada is required to report breaches of its security safeguards and any unauthorized disclosure of, or access to, *Personal Information* to the Office of the Privacy Commissioner if the breach, disclosure, or access may pose a “real risk of significant harm” to an individual. A “real risk of significant harm” is defined as: “*Bodily harm, humiliation, damage to reputation or relationships, loss of employment, business or professional opportunities, financial loss, identity theft, negative effects on the credit record and damage to or loss of property.*”
25. Reporting – Curling Canada will report the breach or unauthorized access or disclosure to the Office of the Privacy Commissioner in the form and format specified by the Office of the Privacy Commissioner or will be subject to financial penalties.
26. Records and Notification – In addition to reporting the breach or unauthorized access or disclosure, Curling Canada will keep records of the breach and inform affected individuals.

Individual Access

27. Access – Upon written request, and with assistance from Curling Canada, an individual may be informed of the existence, use and disclosure of his or her *Personal Information* and shall be given access to that information. Further, an individual is entitled to be

informed of the source of the *Personal Information* along with an account of third parties to whom the information has been disclosed.

28. Response – Requested information shall be disclosed to the individual within thirty (30) *Days* of receipt of the written request at no cost to the individual, or at nominal costs relating to photocopying expenses, unless there are reasonable grounds to extend the time limit.
29. Denial – An individual may be denied access to his or her *Personal Information* if the information:
 - a) Cannot be disclosed for legal, security, or commercial proprietary purposes; or
 - b) Is subject to solicitor, Curling Canada privilege or litigation privilege.
30. Reasons – Upon refusal, Curling Canada shall inform the individual the reasons for the refusal and the associated provisions of the *Act*.
31. Identity – Sufficient information shall be required to confirm an individual's identity prior to providing that individual an account of the existence, use, and disclosure of *Personal Information*.

Challenging Compliance

32. Challenges – An individual shall be able to challenge compliance with this Policy and the *Act* to the designated individual accountable for compliance.
33. Procedures – Upon receipt of a complaint Curling Canada shall:
 - a) Record the date the complaint is received;
 - b) Notify the Privacy Officer who will serve in a neutral, unbiased capacity to resolve the complaint;
 - c) Acknowledge receipt of the complaint by way of written communication and clarify the nature of the complaint within three (3) *Days* of receipt of the complaint;
 - d) Appoint an investigator using Curling Canada personnel or an independent investigator, who shall have the skills necessary to conduct a fair and impartial investigation and shall have unfettered access to all relevant file and personnel, within ten (10) *Days* of receipt of the complaint;

- e) Upon completion of the investigation and within twenty-five (25) *Days* of receipt of the complaint, the investigator will submit a written report to Curling Canada; and
 - f) Notify the *Complainant* to the outcome of the investigation and any relevant steps taken to rectify the complaint, including any amendments to policies and procedures within thirty (30) *Days* of receipt of the complaint.
34. Whistleblowing – Curling Canada shall not dismiss, suspend, demote, discipline, *Harass* or otherwise disadvantage any director, officer, employee, committee member, volunteer, trainer, contractor, and other decision-maker within Curling Canada or deny that person a benefit because the individual, acting in good faith and on the basis of reasonable belief:
- a) Disclosed to the commissioner that Curling Canada has contravened or is about to contravene the *Act*;
 - b) Has done or stated an intention of doing anything that is required to be done to avoid having any person contravene the *Act*; or
 - c) Has refused to do or stated an intention of refusing to do anything that is in contravention of the *Act*.

IP Address

35. *IP Address* – Curling Canada does not collect, use, or disclose *Personal Information* such as *IP Addresses*.

Applicable Law

36. Applicable Law – Curling Canada website is created and controlled by Curling Canada in the Province of Ontario. As such, the laws of the Province of Ontario shall govern the website's disclaimers, terms, and conditions.