

Upper Canada Swim Club – River Otters (UCRO)

Policy – Personal Information and Protection

Approved – November 25, 2025

Note: *this document is adapted from the Swim Ontario “Privacy Policy” template in the “Club/Outreach/Tool Kit” section of the Swim Ontario website.*

UCRO routinely collects information about its registered members and their parents/legal guardians as required.

This Personal Information and Protection policy is intended to inform the community, including in particular those whose personal information we hold, of our approach to collecting, using and protecting your personal information.

1. Accountability

- a. UCRO considers that protecting all personal information is important and takes your right to privacy seriously.

2. Purpose

- a. UCRO collects only the personal information that it needs in order to provide its services and opportunities. If the personal information that Club seeks is not provided, the services and opportunities available from UCRO may be limited.

3. Consent

- a. Swimmers who join UCRO will also share some personal information with Swim Ontario (“SO”). This information will be handled in accordance with Swim Ontario’s Personal Information Protection Policy.
- b. UCRO will collect personal information from swimmers on registration that will be collected and used in accordance with this policy.
- c. UCRO may collect additional personal information about the swimmer such as performance results or medical information such as is necessary for competitive swimming and the health and safety of the swimmer.

4. Limited Collection

- a. Subject to the disclosure provisions in this statement, all of the personal information gathered by UCRO will be protected by password access. Only UCRO staff, Board members or other UCRO officials may access personal information and even then only for one of the purposes outlined in this Policy. Once UCRO no longer has a need for personal information it will either be destroyed or de-identified.

5. Use, Disclosure and Retention

- a. UCRO may use this personal information to manage and administer the services it provides.

6. Disclosure to third parties

- a. From time to time, UCRO may disclose your personal information to certain third parties. If UCRO does this, it requires the recipients to protect your personal information in the same way and to the same high standards as UCRO. The types of organizations to which UCRO may disclose your personal information may include:
 - i. External service providers that provide UCRO with financial, legal, administrative, information, technology, banking, travel, uniform manufacturing, publications and other services.
 - ii. Swimming organizations and committees including Swim Ontario, the Canadian Olympic Committee, the Canadian Commonwealth Games Association, SNC and FINA; SO Members, provincial swimming associations, local swimming clubs and other organizations with which UCRO is associated
 - iii. Disciplinary committees and investigative bodies
 - iv. Government agencies (as part of our regulatory and/or statutory obligations)
 - v. UCRO may also disclose your personal information in accordance with its constitution or By-Laws.

7. Types of Information and Storage

- a. **Registration Information** - UCRO may collect information including, but not limited to, contact information, age, address, date of birth, and disciplinary records to facilitate UCRO's services and operations.
- b. **Personal Profile and Results** - UCRO may also disclose your personal information including your personal profile, photographs of you and your results to the media, in our newsletter and on our Internet site for public viewing.
- c. **Images and Video Recordings** – UCRO may collect and store images and videos of swimmers in or out of the pool.
- d. **Sensitive Information** - UCRO may also need to collect a swimmer's sensitive information including medication being taken, diagnoses of specific conditions and results from any drug testing undertaken at the direction of UCRO.
 - i. UCRO may disclose a swimmer's sensitive information to Anti Doping Authorities, FINA, medical boards, and the swimmer's Team Manager and a relevant competition Medical Practitioner from time to time.
- e. **Storage** - UCRO stores Sensitive Information on the password protected Active Swim Manager platform, Pool Queue registration platform and UCRO Google individual and shared drives.

8. Consent to collection of Sensitive Information

- a. By signing off on and agreeing to the Privacy Policy during registration, you confirm that you have read and understood this Privacy Statement and you consent to the collection, use, disclosure and storage of your sensitive information in accordance with this Privacy Statement.

9. Prohibited Persons/Police Check

- a. UCRO may arrange for prohibited persons and/or police check to be undertaken on your behalf and will collect the results of such a check. The results from this check may be disclosed.

10. Access and Accuracy

- a. Any individual or a minor's parent/guardian may request access to the personal information that UCRO holds about them. Any individual or a minor's parent/guardian may ask UCRO at any time to correct their personal information where you believe it is incorrect or out of date.

11. Challenging Compliance

- a. There will be no fee for accessing your personal information. To access personal information that UCRO holds about you, or to obtain more information about your rights or UCRO's Privacy Policy, please contact UCRO's President at: admin@riverotters.ca

12. Current Privacy Statement

- a. This Privacy Policy may be amended from time to time if there are changes in the law or to best privacy protection practices.

13. Website Privacy Statement

- a. UCRO, through its website host, records visits to this website and logs the following information for statistical purposes: the user's server or proxy address, the date/time/length of the visit and the files requested. The information is used to analyze our server traffic. No attempt will be made to identify users or their browsing activities except where authorized by law. For example, in the event of an investigation, a law enforcement agency may exercise their legal authority to inspect the internet service provider's logs. If you send us an email message we will record your contact details, and this information will only be used for the purpose for which you have provided it. We will not use your email for any other purpose and will not disclose it without your consent. When users choose to join a mailing list their details are added to that specific mailing list and used for the stated purpose of that list only. This is a cookie-free site.
- b. You need to be aware of inherent risks associated with the transmission of information via the Internet. If you have concerns in this regard, UCRO has other ways of obtaining and providing information.

- c. UCRO is not responsible for the privacy practices or the content of the linked websites and the other pages hosted by UCRO on behalf of non-UCRO agencies and organizations.