

CHAMPIONS GYMNASTICS Inc.



“Where every child is a winner”

9527-49 St., Edmonton, Alberta, T6B-2L8

Tel (Msg): 780-440-0014 Fax: 780-485-0624 E-mail: championsgymnastics@telus.net

Visit our website at: www.championsgymnastics.ca

CHAMPIONS GYMNASTICS INC.

PRIVACY POLICY

FOR MEMBER INFORMATION

December 2004

TABLE OF CONTENTS

I. OUR COMMITMENT TO PRIVACY 1

II. INTRODUCTION 1

III. SUMMARY OF PRINCIPLES 2

IV. CHAMPIONS GYMNASTICS INC.'S PRIVACY PRINCIPLES FOR MEMBER INFORMATION 3

 A. Accountability 3

 B. Identifying Purposes for Collection 4

 C. Obtaining Consent for Collection, Use or Disclosure 4

 D. Limiting Collection of Personal Information 5

 E. Limiting Use, Disclosure, and Retention of Information 5

 F. Accuracy of Personal Information 6

 G. Security Safeguards 6

 H. Openness Concerning Policies and Practices 6

 I. Individual Access to Personal Information 7

 J. Challenging Compliance 8

Appendix "A" Designated Individuals 9

**CHAMPIONS GYMNASTICS INC. PRIVACY POLICY
FOR MEMBER INFORMATION**

I. OUR COMMITMENT TO PRIVACY

This Privacy Policy is a demonstration of Champions Gymnastics Inc.'s commitment to privacy protection. It has always been Champions Gymnastics Inc.'s priority to safeguard any information provided by our members. We are committed to meeting, and where possible, exceeding, the requirements of all applicable privacy legislation that relates to Champions Gymnastics Inc.'s businesses (the "privacy legislation").

At Champions Gymnastics Inc., member information is maintained as strictly confidential. Unless you authorize us to release it, or release is required or permitted by law, we will not disclose information about you to any third parties. However, in order to better provide you with our services, we will share information with suppliers who perform services on our behalf and with whom contracts have been signed that obligate that third party to adhere to Champions Gymnastics Inc.'s privacy policies. We never sell, lease or trade information about you or your accounts to other parties, unless you authorize us to do so, or unless required or permitted by privacy legislation.

II. INTRODUCTION

Champions Gymnastics Inc. has a longstanding policy of protecting the privacy of individuals in all our business operations. The object of this Privacy Policy is to promote responsible and transparent practices in the management of Personal Information in accordance with the provisions of privacy legislation. Personal Information is information about an identifiable individual, but does not include publicly available information such as a public directory listing of your name, address or phone number nor does it include aggregated information that cannot be associated with a specific individual.

III. SUMMARY OF PRINCIPLES

Champions Gymnastics Inc. is committed to the ten principles, which are set out in the privacy legislation. Champions Gymnastics Inc. adopts the following principles as the foundation of this Privacy Policy:

A. *Accountability*

Champions Gymnastics Inc. is responsible for Personal Information under its control and shall designate an individual to be accountable for Champions Gymnastics Inc.'s compliance with the principles set out in this Privacy Policy and in applicable legislation.

B. *Identifying Purposes*

Champions Gymnastics Inc. will identify the purposes for which Personal Information is collected at or before the time the information is collected.

C. *Consent*

Champions Gymnastics Inc. will obtain the consent of an individual for the collection, use or disclosure of his or her Personal Information, except where inappropriate.

D. *Limiting Collection*

Champions Gymnastics Inc. will limit the collection of Personal Information to that which is necessary for the purposes it identifies. Champions Gymnastics Inc. will only collect information by fair and lawful means.

E. Limiting Use, Disclosure and Retention

Champions Gymnastics Inc. will not use or disclose Personal Information for purposes other than those for which it was collected, except with the consent of the individual or as required by law or law enforcement and in emergency situations. Champions Gymnastics Inc. will only retain Personal Information as long as necessary for the fulfillment of those purposes or as required by law.

F. Accuracy

Champions Gymnastics Inc. will endeavor to ensure that Personal Information is as accurate, complete, and up-to-date as is necessary for the purposes for which it is used.

G. Safeguards

Champions Gymnastics Inc. will protect Personal Information by security safeguards appropriate to the sensitivity of the information.

H. Openness

Champions Gymnastics Inc. will make readily available to individuals specific information about its policies and practices relating to the management of Personal Information.

I. Individual Access

Upon a written request, Champions Gymnastics Inc. will inform an individual of the existence, use, and disclosure of his or her Personal Information and allow access to that information.

J. Challenging Compliance

An individual will be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for Champions Gymnastics Inc.'s compliance.

IV. PRIVACY PRINCIPLES FOR MEMBER INFORMATION

A. Accountability

Champions Gymnastics Inc. is responsible for Personal Information under its control and shall designate an individual to be accountable for Champions Gymnastics Inc.'s compliance with the principles set out in this Privacy Policy and in applicable legislation.

1. Responsibility for ensuring compliance with the provisions of this Privacy Policy rests with Champions Gymnastics Inc.'s senior management, which has designated a Privacy Officer to be accountable for compliance with this Privacy Policy.
2. Champions Gymnastics Inc. is responsible for safeguarding Personal Information in its possession or control. Champions Gymnastics Inc. will use appropriate means to provide a comparable level of protection when Personal Information is being processed by a third party.
3. The Privacy Officer will have responsibility to give effect to the Privacy Policy, which responsibility shall include:
 - (a) Implementing procedures to protect Personal Information and to oversee Champions Gymnastics Inc.'s compliance with this Privacy Policy;

- (b) Establishing procedures to receive and respond to inquiries and complaints;
- (c) Training staff and communicating to staff about Champions Gymnastics Inc.'s policies and practices; and
- (d) Developing public information to explain Champions Gymnastics Inc.'s policies and practices.

For the name, title and contact information for the person currently designated as Champions Gymnastics Inc.'s Privacy Officer, refer to Appendix "A".

B. Identifying Purposes for Collection

Champions Gymnastics Inc. will identify the purposes for which Personal Information is collected at or before the time the information is collected.

1. Champions Gymnastics Inc. will document the purposes for which Personal Information is collected, and will only collect Personal Information for the identified purposes.
2. Champions Gymnastics Inc. will specify to the individual, orally, electronically or in writing, the identified purposes at or before the time Personal Information is collected. Upon request, persons collecting Personal Information will explain these identified purposes or refer the individual to the Privacy Officer who will explain the purposes.
3. Unless required by law or law enforcement or in emergency situations, Champions Gymnastics Inc. will not use or disclose for any new purpose Personal Information that has been collected without first identifying and documenting the new purpose and obtaining the consent of the individual.

C. Obtaining Consent for Collection, Use or Disclosure

Champions Gymnastics Inc. will obtain the consent of an individual for the collection, use or disclosure of his or her Personal Information, except where inappropriate.

1. The consent of an individual is required for the collection, use, or disclosure of Personal Information, except where inappropriate (for example, where legal, medical or security reasons make it inappropriate). In those limited circumstances, Personal Information can be collected, used, or disclosed without the knowledge and consent of the individual.
2. Generally, Champions Gymnastics Inc. will seek consent to use and disclose Personal Information at the same time it collects the information. However, in certain circumstances, Champions Gymnastics Inc. may seek consent to use and disclose Personal Information after it has been collected.
3. In obtaining consent, Champions Gymnastics Inc. will ensure that an individual is advised of the identified purposes for which Personal Information will be used or disclosed. Purposes will be stated in a manner that can be reasonably understood by the individual.
4. Champions Gymnastics Inc. will require individuals to consent to the collection, use or disclosure of Personal Information as a condition of the supply of a product or service only if such collection, use or disclosure is required to fulfill identified, legitimate purposes.

5. In determining the appropriate form of consent, Champions Gymnastics Inc. will take into account the sensitivity of the Personal Information and the reasonable expectations of the individuals involved. Champions Gymnastics Inc. may obtain consent from individuals in different ways. In some cases, the use of products and services by an individual will constitute implied consent for Champions Gymnastics Inc. to collect, use and disclose Personal Information for identified purposes.
6. An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Individuals may contact Champions Gymnastics Inc. for more information regarding the implications of withdrawing consent.

D. Limiting Collection of Personal Information

Champions Gymnastics Inc. will limit the collection of Personal Information to that which is necessary for the purposes it identifies. Champions Gymnastics Inc. will only collect information by fair and lawful means.

1. Champions Gymnastics Inc. will not collect Personal Information indiscriminately, and will limit the amount and type of information to that which is necessary to fulfill identified purposes.
2. Champions Gymnastics Inc. collects Personal Information primarily from its members, but Champions Gymnastics Inc. may also collect Personal Information from other sources, including but not limited to credit bureaus.

E. Limiting Use, Disclosure, and Retention of Information

Champions Gymnastics Inc. will not use or disclose Personal Information for purposes other than those for which it was collected, except with the consent of the individual or as required by law or law enforcement and in emergency situations. Champions Gymnastics Inc. will only retain Personal Information as long as necessary for the fulfillment of those purposes or as required by law.

1. Champions Gymnastics Inc. will keep Personal Information only as long as it remains necessary or relevant for the identified purposes or as required by law. Where Personal Information has been used to make a decision about an individual, Champions Gymnastics Inc. will retain that Personal Information for a period of time that is reasonably sufficient to allow for access by the individual.
2. Champions Gymnastics Inc. will maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to Personal Information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information will be destroyed, erased or made anonymous.
3. Champions Gymnastics Inc. will maintain a record of the third parties that Personal Information is disclosed to in accordance with this Privacy Policy.

F. Accuracy of Personal Information

Champions Gymnastics Inc. will endeavor to ensure that Personal Information is as accurate, complete, and up-to-date as is necessary for the purposes for which it is used.

1. Personal Information used by Champions Gymnastics Inc. shall be as accurate, complete and up-to-date as is necessary to minimize the possibility that inappropriate information may be used to make a decision about an individual.

2. Champions Gymnastics Inc. will update Personal Information as and when necessary to fulfill the identified purposes or upon notification by the individual.
3. Champions Gymnastics Inc. will not routinely update Personal Information, unless it is necessary to fulfill the identified purposes.

G. Security Safeguards

Champions Gymnastics Inc. will protect Personal Information by security safeguards appropriate to the sensitivity of the information.

1. Champions Gymnastics Inc. will protect Personal Information against loss or theft, as well as unauthorized access, disclosure, use, modification or destruction, through appropriate security measures. The nature of the safeguards will vary depending on the sensitivity of information collected.
2. Champions Gymnastics Inc. will ensure that its employees that have access to Personal Information respect the confidentiality of that information and comply with this Privacy Policy.
3. Contractors, consultants, and third party service providers will be contractually bound to comply with Champions Gymnastics Inc. policies that reference privacy of information.
4. Champions Gymnastics Inc. will use care in the disposal or destruction of Personal Information, to prevent unauthorized parties from gaining access to the information.

H. Openness Concerning Policies and Practices

Champions Gymnastics Inc. will make readily available to individuals specific information about its policies and practices relating to the management of Personal Information.

1. The information that Champions Gymnastics Inc. makes available about its policies and practices will be easy to understand, and will include:
 - (a) The name or title, and the address, of the person who is accountable for Champions Gymnastics Inc.'s policies and practices and to whom complaints or inquiries can be forwarded;
 - (b) The means of gaining access to Personal Information held by Champions Gymnastics Inc.;
 - (c) A copy of any brochures or other information that explains Champions Gymnastics Inc.'s policies, standards or codes;
 - (d) What Personal Information is made available to related organizations; and
 - (e) A description of the type of Personal Information held by Champions Gymnastics Inc., including a general account of its use.
 - (f) Champions Gymnastics Inc. will make available information to help individuals exercise choices regarding the use of Personal Information.

I. Individual Access to Personal Information

Upon a written request, Champions Gymnastics Inc. will inform an individual of the existence, use, and disclosure of his or her Personal Information and allow access to that information.

1. Upon request, Champions Gymnastics Inc. will afford individuals a reasonable opportunity to review the Personal Information in the individual's file. Personal information will be provided in an understandable form within a reasonable time period, and at a reasonable, or no, cost to the individual.
2. In certain situations as specified in the privacy legislation, Champions Gymnastics Inc. may not be able to provide access to all the Personal Information that it holds about an individual. For example, Champions Gymnastics Inc. may not provide access to information if doing so would likely reveal Personal Information about a third party or could reasonably be expected to threaten the life or security of another individual. Also, Champions Gymnastics Inc. may not provide access to Personal Information if disclosure would reveal confidential commercial information, if the information is protected by solicitor client privilege, if the information was generated in the course of a formal dispute resolution process, or if the information was collected in relation to the investigation of a breach of an agreement or a contravention of a federal or provincial law. If, upon a request being made by an individual, access to his or her Personal Information cannot be provided, Champions Gymnastics Inc. will provide the reasons for denying access.
3. In order to safeguard Personal Information, an individual will be required to provide sufficient identification information to permit Champions Gymnastics Inc. to authorize access to the individual's file. Any such information will be used only for this purpose.
4. Individuals can obtain information or seek access to their individual files by contacting the Champions Gymnastics Inc.'s Privacy Officer.

J. Challenging Compliance

An individual will be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for Champions Gymnastics Inc.'s compliance.

1. Champions Gymnastics Inc. will maintain procedures for addressing and responding to all inquiries, or complaints from individuals about Champions Gymnastics Inc.'s handling of Personal Information.
2. Champions Gymnastics Inc. will inform individuals about the existence of these procedures as well as the availability of complaint procedures.
3. Champions Gymnastics Inc. will investigate all complaints concerning compliance with this Privacy Policy. If a complaint is found to be justified, Champions Gymnastics Inc. will take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. An individual will be informed of the outcome of the investigation regarding his or her complaint.
4. Champions Gymnastics Inc. will promptly correct or complete any Personal Information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness will be noted in the individual's file. Where appropriate, Champions Gymnastics Inc. will notify third parties having access to the Personal Information in question about any amended information or the existence of any unresolved differences.
5. An individual that has concerns with Champions Gymnastics Inc.'s privacy practices should contact Champions Gymnastics Inc.'s Privacy Officer using the contact information set out in Appendix A.

6. An individual may seek advice from the Office of the Information and Privacy Commissioner of Alberta as follows:

E-mail: **generalinfo@oipc.ab.ca**
Fax: **(403) 297-2711**
Mail: **Office of the Information and Privacy Commissioner**
 (Calgary)
 Suite 500, 640 - 5th Avenue SW
 Calgary, AB T2P 3G4
Phone: **(403) 297-2728 (local) or**
 1-888-878-4044 (Toll-Free)

If appropriate, an individual may file a written complaint with that office. However, the individual is encouraged to use Champions Gymnastics Inc.'s complaint procedures to try to resolve the matter before contacting the Privacy Commissioner.

Appendix "A"

Designated Privacy Officer

Responsibility for ensuring compliance with the provisions of this Privacy Policy rests with Champions Gymnastics Inc.'s Privacy Officer, who is designated to be accountable for obtaining compliance with this Privacy Policy.

The Privacy Officer is:

Name: Michel Arsenault
Address: 9527-49 St., Edmonton, Alberta, T6B-2L8
Phone Number: 780-440-0014
Fax Number: 780-485-0624
E-mail: championsgymnastics@telus.net