

SILVER SPOKES CYCLING CLUB	Revision 2
PERSONAL INFORMATION AND PRIVACY POLICY	April 2024

1. Definitions

The following terms have these meanings in this Policy:

- a) “SSCC” - The Silver Spokes Cycling Club
- b) “Individual” – A person engaged in activities with the SSCC including, but not limited to Members and those serving on the Board of Directors of the SSCC
- c) “Member” – An Individual who has chosen to join the SSCC and has fully paid the annual fee
- d) “Directors” – Those Members who have been elected or appointed to the Board of Directors for the current calendar year in accordance with the relevant By-Law provisions.
- e) “Personal Information” – any information about an Individual that the SSCC collects when the Individual registers to become a member of the SSCC or participates in SSCC activities.

2. Introduction

The SSCC respects the privacy of Individuals and is committed to complying with all relevant legal and regulatory requirements concerning privacy. All Members are encouraged to read and familiarize themselves with this Policy.

3. External Organizations Acquiring Personal Information

Individuals are advised that by virtue of SSCC’s affiliation with Ontario Cycling (OC), OC may acquire and retain Personal Information concerning SSCC Members (for example, information submitted through an accident report.) Protection of this Personal Information shall be governed by the relevant OC Privacy Policy and is not the responsibility of SSCC.

SSCC uses the services of the Cycling Component Network (CCN) to process memberships. Personal Information, including credit card payment information, provided to and under the custody and control of CCN is governed by the relevant CCN Privacy Policy and is not the responsibility of SSCC.

4. Information Collection Purposes

SSCC collects Personal Information for the following purposes:

- a) To process membership data, including OC membership
- b) To provide emergency contact information
- c) To update Members on information related to the Club including ride schedules, meetings, special events, etc.

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5. Information Collected

The SSCC collects the following Personal Information from Individuals when they register to become a Member of the SSCC (through CCN):

- a) First Name
- b) Last Name
- c) Gender
- d) Date of Birth
- e) Email
- f) Address (street, city, country, postal)
- g) Telephone Number
- h) Emergency Contact Name
- i) Emergency Contact Telephone Number
- j) Emergency Contact Relationship
- k) Medical Conditions or Allergies

SSCC does **not** collect or retain Member financial information such as credit card numbers.

6. Management of Personal Information

Personal Information will be protected against loss or theft, unauthorized access, disclosure, copying, use, or modification by security safeguards appropriate to the sensitivity of the Personal Information.

Personal Information will be retained as long as reasonably necessary to enable participation in SSCC programs, events, and activities, and in order to maintain historical records as may be required by law or by governing organizations.

Individuals may at any time request access to the information that SSCC has on file for them by contacting the SSCC Treasurer and/or Secretary.

7. Information Access and Disclosure

Immediate Access

The following Directors have immediate access to the information in Section 5:

- i) President ii) Treasurer iii) Secretary

Ride Leaders

The Treasurer will provide a list of Members with first and last names, emergency contact names and telephone numbers, and any voluntarily disclosed medical conditions/allergies to the Ride Leaders for all SSCC sanctioned rides, for the purpose of ensuring they are current Members in good standing of the SSCC and OC, and for use in the event of emergencies while on a ride.

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Emergencies

Individuals participating in rides are responsible for carrying with them their Emergency Contact Name, Emergency Contact Telephone Number, Emergency Contact Relationship and Medical Conditions or Allergies, either on a wristband/tag or on their bike.

- i) In the event that an Individual is in an accident but is conscious, they are encouraged to allow their emergency information to be released such that another Individual can notify the emergency contact.
- ii) In an emergency threatening an Individual's life, health or security the Members listed in Section 7 may release necessary Personal Information to medical and/or law enforcement personnel. SSCC will inform the Individual of the disclosure.

Disclosure

SSCC may disclose Personal Information without the Individual's knowledge or consent only:

- a) To a lawyer representing SSCC
- b) To collect a debt that the Individual owes to SSCC
- c) To comply with legal proceedings of any sort
- d) To comply with government regulations
- e) To an investigative body for purposes related to the investigation of a breach of an agreement or a contravention of a federal or provincial law

Other than as described above, Personal Information will not be disclosed to third parties without the express permission of the Individual.

8. Photography

Members may, from time to time, take photographs (including videos) of club activities for the purpose of posting them on the SSCC website or SSCC-administered social media or for use in SSCC promotional material. The Member taking such photographs shall announce this to the subjects of the photographs and any Individual who does not wish to be included shall announce this to the Member and other Individuals and step aside so as not to be included in the photograph. Failure to do so shall imply consent for the use of the Individual's image in the photograph. Individuals may, at any time, request that any photographs with their image be removed from the SSCC website or social media.

9. Canadian Anti-Spam Law

The SSCC is compliant with the Canadian Anti-Spam Law (CASL), meaning SSCC will not send Members unsolicited emails without their express or implied consent. Membership in the Silver Spokes Google Groups mailing list, or social media groups affiliated with Silver Spokes shall signify consent.