



# Personal Information & Data Security Policy

Surrey United Soccer Club (“Club”) recognizes the sensitivity surrounding the collection, use and disclosure of Personal Information received in a variety of methods from our Members. The Club is bound by the Personal Information Protection and Electronic Documents Act (“PIPEDA”) and strives to comply with General Data Protection Legislation (“GDPR”) as such, abides by the principles set forth in this Personal Information & Data Security Policy (“Policy”) with respect to personal information:

## Accountability

The Club remains responsible for personal information under its control and the Club’s Risk Manager shall remain responsible for the controls put into place for the protection of such information.

## Purpose and Consent

The Club collects and processes personal information of the types described below, or relating to the particular categories of individuals described below, in accordance with the principle set out in this Policy:

**Contractor and Volunteer Data:** This includes personal information collected and used for contracting processes from current, former and prospective contractors and volunteers. It may also include other Personal Information relevant to the role that may be collected from third parties, such as criminal record and background checks or professional certifications.

**Member Data:** This includes personal information received from members and their families in relation to their registration in Club programming or events.

**Third Party Partner Data:** This refers to personal information of suppliers, agents and other third party partners including contact

information and other personal information collected or disclosed in relation to the services performed for the Club or its members.

**Contact Information:** This includes personal information relating to an individual’s name, title, company affiliation, mailing address numbers, SMS text contact information, email address, and contact preferences.

**Video and Visual Data:** Still and motion imagery collected throughout matches and training sessions for use by the Club in its advertising, social media, or video analysis program purposes. Personal identifiers will not accompany any publication of a photo or video without specific written consent.

The purpose for which personal information is collected, used, and disclosed by the Club in the course of its business shall include general details pertaining to the Club’s purpose for the collection of such information.

Providing information in the context for which it is intended is deemed to be consent by the provider for the context in which it has been collected.

Personal information shall be retained only if necessary, for the fulfillment of those purposes.

The Club may disclose personal information collected in its normal course of business without the knowledge or consent of the individual if the disclosure is to abide by laws, court orders or other judicial or government obligation or for the purposes of collecting a debt owed by the individual to the Club.

### Data Security

Where a third party provides outsourced or cloud IT services or otherwise processes personal information on behalf of the Club specific security arrangements will be implemented, when required, through contractual arrangements with those

organizations.

Appropriate third-party due diligence will be carried out to assess whether a third party maintains security practices consistent with GDPR and local data security legislation, as applicable.

### Compliance

An individual shall be able to address a challenge concerning compliance with the above principles in writing to the Club's Risk Manager.

### Formal Request under PIPEDA

The Club shall inform members of any formal request for disclosure made under PIPEDA as may be necessary.

### Questions

Questions about this policy may be directed to the Risk Manager: [riskmanagement@surreyunitedsoccer.com](mailto:riskmanagement@surreyunitedsoccer.com)