

PRIVACY POLICY
ALBERTA AMATEUR WRESTLING ASSOCIATION

1. PREFACE

Protecting the privacy and confidentiality of personal information is an important aspect of the way Alberta Amateur Wrestling Association (“AAWA”) conducts its activities as the provincial sport organization for amateur wrestling in Alberta and as a central hub for the collection, use, and disclosure of personal information relating to the sport of wrestling in the province. Collecting, using, and disclosing personal information in an appropriate, responsible, and ethical manner is fundamental to AAWA’s daily operations and to its overall governance and risk-management framework.

AAWA strives to protect and respect the personal information of its members, athletes, parents/guardians, participants, coaches, officials, volunteers, employees, business partners, and other individuals, in accordance with Alberta’s Personal Information Protection Act (“PIPA”), Canada’s Personal Information Protection and Electronic Documents Act (“PIPEDA”), where applicable, and other applicable laws. The AAWA Board of Directors is ultimately responsible for overseeing AAWA’s compliance with this Privacy Policy and for integrating privacy into AAWA’s strategic planning, risk management, and governance processes. The Board has appointed a Privacy Officer with responsibility for day-to-day oversight of privacy compliance, including training, safeguards, breach response, and responding to access, correction, and complaint requests.

Each director, officer, employee, coach, contractor and volunteer of AAWA must abide by this organization’s procedures and practices when handling personal information, and must incorporate privacy considerations into decision-making relating to registration systems, competition administration, rankings, team selection, travel, and safe sport processes. AAWA shall provide appropriate training and resources to ensure all such individuals understand and can comply with their obligations under this Privacy Policy, PIPA, and, where applicable, PIPEDA, as well as under related AAWA policies that may require or govern the collection, use, or disclosure of personal information, including without limitation AAWA’s Code of Conduct, Screening Policy, Discipline and Complaints Policy, and Safe Sport-related policies.

2. SCOPE AND APPLICATION

2.1 PIPA Application

This Privacy Policy is intended to ensure that AAWA complies with PIPA, and, where PIPEDA applies, with PIPEDA, in respect of:

- a) personal information that AAWA collects, uses and discloses in the course of its commercial activities; and
- b) employment information about AAWA’s employees, as that term is interpreted under PIPA, and, where applicable, similar employment-related information governed by PIPEDA.

“Commercial activities” may include, for example, charging membership or registration fees, operating paid programs or camps, selling merchandise, and other activities of a commercial nature.

2.2 Non-Commercial Personal Information

AAWA also collects, uses and discloses personal information in contexts that may not constitute “commercial activities” for the purposes of PIPA, such as certain volunteer-only activities, purely internal administrative

matters, governance activities as the provincial sport organization for wrestling in Alberta, and coordination with other sport bodies as a central registration and information hub.

Although PIPA may not legally apply to all such non-commercial activities, AAWA chooses, as a matter of good governance, athlete protection, and best practice, to apply the privacy principles set out in this Privacy Policy to all personal information that it handles, to the extent reasonably practicable, across all of its operations and programs, even where PIPA does not strictly apply.

2.3 Relationship Between Legal Requirements and Policy Commitments

Where PIPA applies, individuals may have statutory rights and remedies, including rights of access and correction and the ability to complain to the Office of the Information and Privacy Commissioner of Alberta. Where PIPEDA applies, individuals may also have rights and remedies under PIPEDA, including the right to make a complaint to the Office of the Privacy Commissioner of Canada.

Where PIPA or PIPEDA does not apply, AAWA will nonetheless follow the processes and protections described in this Privacy Policy as a matter of policy to the extent reasonably practicable. However, in those non-PIPA and non-PIPEDA contexts, individuals may not have the same statutory rights and remedies under those statutes (including the right to file complaints with the Office of the Information and Privacy Commissioner of Alberta or the Office of the Privacy Commissioner of Canada), even though AAWA's internal standards remain substantially the same. Individuals may still raise questions or concerns with the AAWA Privacy Officer as described in Section 13 of this Privacy Policy, and AAWA will work with them to address those concerns.

3. PERSONAL INFORMATION

“Personal Information” means information about an identifiable individual, including but not limited to:

- a) name, date of birth, address, telephone number, cell phone number, e-mail address;
- b) marital or family status, dependent and emergency contact information;
- c) social insurance number (only where required by law for tax or employment purposes), other identifying numbers, employee or volunteer file information;
- d) nationality, gender, and similar demographic information;
- e) health information, health history, medical conditions, allergies, and emergency contact information. AAWA will collect provincial health care numbers (including Alberta Health Care numbers) as part of registration only where reasonably necessary for emergency response, insurance, or other legitimate health and safety purposes, and may disclose such numbers to coaches, team staff, emergency medical services, hospitals, or other health professionals when required to respond to an actual or reasonably suspected medical emergency. AAWA will implement enhanced security measures for such information, including limiting access to those who reasonably require it for the above purposes.
- f) financial information such as credit card numbers, banking information, payment records, and billing history;
- g) criminal record check results, resumes, reference letters and other screening information; and
- h) opinions, feedback, and personal views recorded in any form.

Personal Information does not include business contact information (such as name, title, business address, business phone, fax or e-mail) when used solely for the purpose of communicating in relation to an individual's role with an organization, or other information excluded from PIPA.

Unless otherwise stated, references to “Personal Information” in this Privacy Policy include personal information handled in both PIPA-covered (commercial and employment) activities and in non-commercial activities.

4. CONSENT

4.1 Members, Prospective Members, Participants, Athletes, and Parents/Guardians

Consent is obtained when an individual (or parent/guardian for a minor under 18 years of age) signs or electronically submits a registration form, membership application, waiver, consent form, or other document containing Personal Information, thereby authorizing AAWA to collect, use, and disclose the individual’s Personal Information for the purposes stated on the form and in this Privacy Policy. For the purposes of this Privacy Policy: (i) a “Member” or “Athlete” includes any individual registered with AAWA (directly or through a member club, school, or other organization) to participate in its programs, training, or competitions or in events sanctioned by AAWA; and (ii) a “Parent/Guardian” means an individual who has legal authority (whether sole, joint, or shared) to make decisions about the minor Athlete’s participation with AAWA and the handling of that Athlete’s Personal Information. In the absence of a court order, separation agreement, parenting plan, or other written legal documentation provided to AAWA that clearly limits or allocates decision-making authority, AAWA will generally assume that each parent of a minor Athlete has authority to provide and withdraw consent and to receive information about that Athlete for the purposes described in this Privacy Policy, including consent to disclose the Athlete’s Personal Information, as reasonably required, to Wrestling Canada Lutte, other provincial, territorial, and international wrestling organizations, member clubs, schools, event hosts, funders, and approved service providers in connection with registration, competition entries, rankings, team selection, travel, and safe sport processes. At the time of collection, AAWA will make reasonable efforts to ensure that individuals are aware of the purposes for which their Personal Information is being collected and the types of organizations to which it may be disclosed.

By registering with AAWA (including by registering through a club, school, or event using an AAWA-approved registration system), participating in AAWA programs or events, or otherwise providing Personal Information to AAWA, the individual (or their parent/guardian) consents to the collection, use, and disclosure of such Personal Information for the purposes described in this Privacy Policy and as disclosed at the time of collection. These purposes include, where applicable, registration and membership administration, competition entries and rankings, team selection and travel logistics (including cross-border travel and transfers of Personal Information to organizations located outside Canada as described in Sections 6.1 and 6.10), safe sport, screening, investigations and discipline processes (as described in this Privacy Policy and in AAWA’s Screening Policy and Discipline and Complaints Policy), and communications about AAWA programs, events, and opportunities. This consent continues unless and until it is withdrawn in accordance with section 4.3 and does not extend to purposes not reasonably expected by the individual or not disclosed at the time of collection.

4.2 Employees, Coaches, Contractors, Volunteers, Students, Interns

AAWA advises that Personal Information will be collected for the purposes of establishing, maintaining, and managing an employment, coaching, contractor, or volunteer relationship, and consent is deemed through entering into and continuing that relationship, subject to applicable law.

4.3 Withdrawal or Variation of Consent

Individuals may withdraw or vary their consent to AAWA's collection, use, or disclosure of their Personal Information, subject to legal or contractual restrictions and reasonable notice.

If an individual wishes to withdraw or vary consent, they must notify AAWA in writing to the AAWA Privacy Officer at the contact information provided in Section 13 of this Privacy Policy. Upon receipt, AAWA will acknowledge the request within 10 business days and will discuss with the individual the implications and options going forward (for example, whether participation, employment, or certain services can continue without the requested information). AAWA will implement the withdrawal or variation within a reasonable time period, subject to legal or contractual obligations (including obligations under AAWA's Code of Conduct, Screening Policy, Discipline and Complaints Policy, and Safe Sport-related policies, and any applicable obligations to other sport organizations or authorities).

5. WHERE CONSENT IS NOT REQUIRED

In certain circumstances, AAWA may collect, use, or disclose Personal Information without an individual's knowledge or consent, as permitted or required by PIPA or other laws. Such situations include, but are not limited to, where:

- a) it is clearly in the individual's interests and consent cannot be obtained in a timely way (for example, in a medical emergency);
- b) AAWA is required by law, regulation, subpoena, warrant, court order, or regulatory authority to collect, use, or disclose Personal Information;
- c) the information is reasonable for the purposes of an investigation or legal proceeding (including a breach of contract or policy, discipline matter, or incident review);
- d) an emergency exists that threatens an individual's life, health, or personal security;
- e) the Personal Information is used for in-house statistical study or research purposes in a form that does not identify individuals; or
- f) the Personal Information is publicly available or obtained from a public body authorized to disclose the information.

6. PURPOSES FOR COLLECTING AND USING PERSONAL INFORMATION

AAWA collects and uses Personal Information solely for the purpose of conducting its activities and developing an understanding of its members and stakeholders. As the provincial sport organization and central data hub for amateur wrestling in Alberta, AAWA receives Personal Information directly from individuals and indirectly from clubs, schools, event hosts, and other sport organizations for registration, competition administration, rankings, team selection, travel, and safe sport processes. Personal Information may be collected from members, prospective members, athletes, participants, parents/guardians, coaches, officials, employees, volunteers, board members, and other individuals ("Individuals") and used by AAWA representatives for purposes that include, but are not limited to, the following:

6.1 Membership, Registration, and Insurance

Name, address, postal code, phone numbers, e-mail address, date of birth and similar contact details for the purposes of:

- a) registering individuals for AAWA programs and events;
- b) managing memberships and rosters;
- c) providing insurance coverage and managing insurance claims (including disclosure to insurance providers and brokers as necessary for coverage and claims administration); and
- d) obtaining or maintaining membership and registration with relevant wrestling associations, federations, or governing bodies (which may include Wrestling Canada Lutte, provincial wrestling associations, and international wrestling federations, and may involve transfer of Personal Information to such organizations, including organizations located outside of Canada), and registering athletes and teams in tournaments or competitions and administering related competition logistics (including brackets, weigh-ins, eligibility, and results). These activities may require AAWA to receive and share limited participant information (such as name, date of birth, weight class, competition level, club or school affiliation, and parent/guardian contact information) with other wrestling clubs, schools, tournament hosts, event organizers, registration platform providers, and funding bodies solely for those registration, eligibility, insurance, ranking, and administration purposes and not for any unrelated marketing or other purposes.

6.2 Employment and Volunteer Management

Employee, coach, contractor and volunteer information, including name, address, contact details, social insurance number (only as required for tax and payroll purposes), work permit or visa information (where applicable for legal compliance), banking information (for payment purposes), resumes, reference letters and related data for the purposes of:

- a) payroll, source deductions, benefits, insurance, and health plans;
- b) human resources administration;
- c) verifying identity and qualifications; and
- d) managing performance and assignments.

6.3 Financial Transactions

Credit card numbers, banking and payment information for the purposes of:

- a) processing registration fees, tournament fees, membership dues, fundraising purchases, merchandise orders, travel administration, and other authorized payments; and
- b) administering refunds or reimbursements.

6.4 Screening and Risk Management

Criminal record checks, vulnerable sector checks, resumes, references, disciplinary and incident records for the purposes of:

- a) implementing AAWA's screening and risk management programs;
- b) promoting a safe environment for athletes, participants and others; and
- c) meeting requirements of affiliated organizations and insurers.

6.5 Health and Safety

Personal health information including medical conditions, allergies, injuries, and emergency contact information for the purposes of:

- a) protecting the safety and well-being of athletes and participants;
- b) responding to medical emergencies; and
- c) communicating with emergency contacts and health professionals where necessary.

6.6 Coaching and Athlete Development

Coach information such as qualifications, certification numbers, experience, training history and performance results for the purposes of:

- a) coach assignment, development, and evaluation;
- b) meeting requirements of affiliating bodies and certification programs; and
- c) media relations and public recognition.

Athlete information including relevant medical history, height, weight, uniform size, birth date, citizenship, competition level, training data, feedback from coaches and trainers, and performance results for the purposes of:

- d) athlete registration, competition entries, rankings, and eligibility;
- e) outfitting athletes with appropriate uniforms and equipment;
- f) training planning and performance monitoring; and
- g) media relations, promotion, and team selection where applicable.

6.7 Anti-Doping and Ethics in Sport

Athlete status information including sport/discipline, training times and venues, camp and competition dates and locations, travel plans and disability information, if applicable, for the purposes of:

- a) inquiries and possible testing by recognized anti-doping agencies; and
- b) compliance with applicable anti-doping and ethics in sport rules.

6.8 Images, Video and Promotion

Video footage and photographs taken at AAWA events, practices, and competitions for the purposes of:

- a) technical monitoring and coaching review;
- b) officials' and coaches' training and education;
- c) AAWA promotions, media releases, social media content, and publications; and
- d) posting on AAWA's website, displays or posters, subject to applicable consent.

6.9 Marketing, Communications, and Fundraising

Contact information and attitudinal or demographic data to:

- a) communicate information about AAWA programs, events, meetings, and opportunities;
- b) assess membership needs and preferences; and
- c) plan and conduct fundraising initiatives and sponsorship activities.

6.10 Travel and Logistics

Passport numbers, frequent flyer numbers and related travel details for the purpose of organizing and administering national or international travel for competitions, training camps, and related activities. Passport information will be collected only when necessary for travel booking or border crossing requirements, and will be subject to enhanced security measures given the sensitivity of this information.

AAWA will obtain consent if Personal Information is to be used for any other purpose, unless permitted or required by legislation without consent. Where additional collection, use, or disclosure is undertaken under AAWA's Code of Conduct, Screening Policy, Discipline and Complaints Policy, Safe Sport-related policies, or similar governance documents, AAWA will do so only to the extent reasonably necessary to administer those policies, to protect participants, or to comply with legal or sport-governing requirements, and, where required by law, after obtaining appropriate consent.

7. POLICY STATEMENTS AND SAFEGUARDS

7.1 Accountability

AAWA is responsible for the Personal Information in its possession and control, including Personal Information collected or stored using third-party registration, competition-management, communication, or cloud-hosting services. The AAWA Board of Directors has appointed the AAWA Privacy Officer to act as custodian of all privacy matters and compliance with this Privacy Policy, any other AAWA privacy policies and procedures, and applicable privacy laws. The Board will receive periodic reports from the Privacy Officer regarding significant privacy risks, breaches, and complaints and will oversee AAWA's privacy risk-management practices. AAWA will use contractual or other appropriate means to ensure that third-party service providers that process Personal Information on AAWA's behalf protect that Personal Information in a manner consistent with this Privacy Policy and applicable law.

7.2 Collection and Limitation of Use

For greater certainty, AAWA may collect and use limited participant information (for example, name, date of birth, parent/guardian contact information, club or school affiliation, and weight class or competition category) for the specific purpose of registering athletes and teams in tournaments or competitions and administering related competition logistics, and will not use such information for unrelated purposes without consent unless otherwise permitted or required by law.

AAWA obtains Personal Information directly from the Individual to whom the information belongs whenever reasonable. Individuals are entitled to know how AAWA uses Personal Information, and AAWA will limit the use of Personal Information to what is reasonably necessary for the stated purposes or for purposes that are reasonably related to those purposes and that a reasonable person would consider appropriate in the

circumstances. AAWA will not share an Individual's sensitive or private Personal Information (such as health information, screening and discipline information, social insurance numbers, passport numbers, or child-protection-related information) with other members, parents/guardians, or third parties unless there is a reasonable and lawful justification to do so (for example, where necessary to administer programs, address safety concerns, apply AAWA's Code of Conduct, Screening Policy, Discipline and Complaints Policy, or Safe Sport-related policies, or comply with legal obligations) and such sharing is carried out in a manner consistent with PIPA and, where applicable, PIPEDA, including as described in this Section 7.2 and in Sections 6.1, 6.4, 6.5, and 7.3 regarding tournament registration, competition administration, screening, and safe-sport processes.

7.3 Disclosure to Third Parties

AAWA will not sell, trade, rent, or otherwise disclose Personal Information or contact lists to third parties for their own marketing purposes. Limited disclosure may occur as part of AAWA's regular operations, for example to:

- a) agents, consultants, contractors, suppliers, insurers, and service providers;
- b) affiliated wrestling associations, federations and governing bodies (including Wrestling Canada Lutte), other provincial and territorial wrestling organizations, and other wrestling clubs, schools, or organizing committees, for the limited purposes of registering athletes and teams in tournaments or events (including national and international events), administering competition logistics (such as brackets, weigh-ins, rankings, team selection, and results), verifying eligibility, and meeting sport-governing and funding-agency reporting requirements, which may involve sharing limited participant information (for example, name, date of birth, club or school affiliation, parent/guardian contact information, and weight class or competition category) solely for those registration, eligibility, ranking, and administration purposes and not for any unrelated marketing or other purposes; and
- c) legal counsel, accountants, and professional advisors;

but only where those parties agree to safeguard Personal Information in a manner consistent with this Privacy Policy and applicable law, and only to the extent necessary for them to perform their services or carry out the specific purposes for which the Personal Information was disclosed. Such third parties are not permitted to use Personal Information received from AAWA for any other purpose without the Individual's consent or as otherwise permitted or required by law.

7.4 Retention and Destruction

AAWA will retain Personal Information only for as long as reasonably necessary to fulfill the purposes for which it was collected, or as required by law, regulation, or sport-governing requirements. Without limiting the generality of the foregoing, and subject to applicable legal requirements and AAWA's records-management practices:

- a) competition results, rankings, and historical performance records may be retained indefinitely in archived or public form (for example, event results posted on AAWA or event websites) for legitimate sport, historical, and statistical purposes, provided that any additional sensitive Personal Information (such as detailed health or discipline information) is not included in public records unless required or permitted by law or applicable sport-governing rules;

7.5 Security Measures

AAWA will protect Personal Information through appropriate physical, organizational, and technological safeguards. These may include:

- a) limiting access to Personal Information to AAWA directors, officers, employees, coaches, and other authorized agents who require the information to perform their duties, and to those otherwise authorized by law;
- b) securing AAWA's computer and network systems by passwords and other access controls;
- c) maintaining active paper files in locked filing cabinets or secure areas;
- d) using firewalls, antivirus, and other security software to protect systems connected to the Internet; and
- e) avoiding transmission of sensitive Personal Information (including, without limitation, health information, screening and discipline information, social insurance numbers, passport numbers, and child-protection-related information) by unencrypted e-mail or insecure electronic means, and limiting transfer of Personal Information to volunteers, interns, or non-paid staff unless necessary and properly safeguarded.

8. AAWA WEBSITE AND ONLINE SERVICES

AAWA's website and any related online services will include or link to this Privacy Policy and will disclose AAWA's practices concerning Personal Information collected online. Individuals inputting Personal Information into AAWA's website or related online platforms will be notified, where practical, of:

the types of Personal Information collected;
the name of the organization collecting the data;
how the data will be used and with whom it may be disclosed;
the options available to the individual regarding collection, use, and disclosure of Personal Information;
the security procedures in place that protect against loss, misuse, or unauthorized access, disclosure, alteration, or destruction of Personal Information; and
(how individuals may access and correct their Personal Information.

Additional principles:

- a) AAWA does not knowingly collect Personal Information online from any individual known to be under the age of 13 without verifiable parental/guardian consent.
- b) AAWA may share compiled, aggregate demographic information with business partners and/or sponsors, but this information will not identify individual persons.
- c) AAWA's website may contain links to other sites; AAWA is not responsible for the privacy practices of those external sites and encourages users to read their privacy policies.
- d) IP addresses may be logged to administer the site, track visitor movement, and gather demographic information, but these IP addresses will not be linked to personally identifiable information, except as required for security or law enforcement purposes.
- e) Any registration or order forms asking site visitors to enter personal or financial information will use reasonable security measures, such as encryption, to protect data in transit.
- f) Site visitors may be provided with the option to opt out of certain uses of their Personal Information at the point where the information is collected, where feasible.

9. ACCURACY OF PERSONAL INFORMATION

AAWA will make reasonable efforts to ensure that Personal Information is accurate and complete for the purposes for which it is to be used. However, AAWA relies on Individuals to notify AAWA, in writing, if there are changes to their Personal Information (for example, contact details, medical information, or emergency contacts).

10. ACCESS TO PERSONAL INFORMATION

10.1 Definition of Member and Parental/Guardian Access

Access will generally include the Individual's own Personal Information contained in AAWA records, but will not include Personal Information about other individuals except where such information can reasonably be severed or where disclosure is otherwise permitted or required by PIPA or other applicable law.

In the case of a minor Athlete, a Parent/Guardian (as defined in section 4.1) may, subject to PIPA and any applicable court orders or agreements provided to AAWA, request access to that minor Athlete's Personal Information on the Athlete's behalf. AAWA will not provide a Parent/Guardian with access to the private Personal Information of another individual (for example, the other parent's contact details, financial information, or complaints made in confidence) unless such information can reasonably be severed, the other individual has consented, or disclosure is otherwise permitted or required by law. Unless and until AAWA is provided with a court order, separation agreement, parenting plan, or other written legal documentation that clearly limits or allocates decision-making authority, AAWA will generally treat each parent of a minor Athlete as having authority to provide and withdraw consent and to request access to that Athlete's Personal Information for the purposes described in this Privacy Policy.

Where AAWA receives conflicting instructions or requests from two or more Parents/Guardians of the same minor Athlete and there is no applicable court order or agreement provided to AAWA that resolves the conflict, AAWA may, acting reasonably and in the best interests of the Athlete, decline to act on non-urgent requests (such as certain access, correction, or consent-withdrawal requests) until the Parents/Guardians resolve the matter between themselves or obtain appropriate legal direction, while continuing to permit the Athlete to participate in AAWA activities where safe and appropriate and continuing to act promptly in any situation involving the Athlete's life, health, or personal security. Where an access or information request, or a requested correction, reasonably affects the rights, interests, or Personal Information of another Individual (for example, in co-parenting or split-custody situations), AAWA may, to the extent permitted or required by PIPA, notify and share relevant portions of the request, supporting information, and AAWA's decision with all affected parties so that their views can be considered and so that any resulting decision is fair, balanced, and transparent.

AAWA may refuse access, in whole or in part, only in circumstances permitted or required by section 24 of PIPA or other applicable law, including where:

- a) the information is subject to legal privilege;
- b) the information was collected for an investigation or legal proceeding;
- c) disclosure could reasonably be expected to threaten the life or security of another individual;
- d) disclosure would reveal the identity of an individual who has provided an opinion in confidence and that individual does not consent to disclosure; or
- e) the information cannot reasonably be severed from information that may not be disclosed, including Personal Information about another individual that AAWA is required or permitted to withhold under PIPA.

11. CORRECTION OF PERSONAL INFORMATION

If an Individual believes that their Personal Information is inaccurate or incomplete, they should notify AAWA in writing as soon as possible, specifying the requested correction.

If AAWA is satisfied that the Personal Information is inaccurate or incomplete, AAWA will correct the information as soon as reasonably possible and, if the incorrect information has been disclosed to other organizations within the previous year, AAWA will, where it is reasonable to do so, send a notification containing the corrected information to each such organization, as required by section 25 of PIPA, and request that they correct their records. If AAWA determines that no correction is required, AAWA will annotate the Personal Information under its control with the Individual's requested correction and the reasons for not making the correction, and will provide written notice to the Individual of the refusal and of the Individual's right to request a review or make a complaint to the Office of the Information and Privacy Commissioner of Alberta in accordance with PIPA.

12. RESPONSE TIME

AAWA will respond to written requests to access or correct Personal Information within 45 days of receiving the request in accordance with PIPA. If AAWA requires an extension beyond 45 days, AAWA will notify the Individual within 45 days of the request, provide reasons for the extension, specify when a response will be provided (which must not exceed 45 additional days), and inform the Individual of their right to request a review by the Office of the Information and Privacy Commissioner of Alberta under section 31 and section 46 of PIPA.

13. QUESTIONS, CONCERNS AND COMPLAINTS

Any questions or concerns regarding this Privacy Policy, any other privacy policy or procedure implemented by AAWA, or AAWA's handling of Personal Information (including requests to access or correct Personal Information, or to make a complaint) may be directed to:

AAWA Privacy Officer
Alberta Amateur Wrestling Association
[Complete physical mailing address must be inserted]

E-mail: [Complete email address must be inserted] (preferred method of contact)

The Privacy Officer will investigate and respond to concerns regarding the handling of Personal Information by AAWA. If the concern is not resolved through AAWA's internal processes, the Individual has the right to request a review by the Office of the Information and Privacy Commissioner of Alberta under section 46 of PIPA. Contact information for the Commissioner's office is: Office of the Information and Privacy Commissioner of Alberta, Suite 2460, 801 - 6 Avenue SW, Calgary, Alberta T2P 3W2, Phone: 403-297-2728, Toll-free: 1-888-878-4044, Website: www.oipc.ab.ca.

14. PRIVACY BREACHES

In the event of a privacy breach (an unauthorized access to, collection, use, disclosure, or disposal of Personal Information, or any other loss of or unauthorized access to Personal Information where a reasonable person would consider that there exists a real risk of significant harm to an individual as a result), AAWA will respond as quickly as reasonably possible upon becoming aware of the breach. AAWA will:

- a) take immediate steps to contain the breach and prevent further unauthorized activity;
- b) investigate to determine the cause and extent of the breach;
- c) assess the risk of harm to affected individuals;
- d) notify affected individuals without unreasonable delay where there is a real risk of significant harm resulting from the breach, as required by section 34.1 of PIPA, and notify the Office of the Information and Privacy Commissioner of Alberta as required by section 37.1 of PIPA, and, if necessary, other bodies such as police, insurers, regulatory bodies, credit card companies or credit reporting agencies; and
- e) implement corrective actions and safeguards to reduce the risk of recurrence; and
- f) maintain a record of all privacy breaches, including breaches that do not meet the threshold for notification, documenting the nature of the breach, the Personal Information involved, the individuals affected, the steps taken to reduce harm, and any notifications made.

15. TRAINING AND AWARENESS

AAWA will train its directors, officers, employees, coaches, volunteers, and other relevant personnel in the application of PIPA, this Privacy Policy, and any other privacy-related policies and procedures adopted by AAWA. Training will be provided to all personnel who handle Personal Information as part of their duties.

16. AVAILABILITY OF POLICY

Copies of this Privacy Policy are available at AAWA or offices and will be provided upon request at minimal or no cost. The most current version is also available on AAWA's website at [insert website URL].

A copy of Alberta's Personal Information Protection Act (PIPA) can be found through the Alberta Queen's Printer website at:

<https://www.qp.alberta.ca>