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**THE ULTIMATE HOCKEY AND SUMMER CAMP EXPERIENCE.**

## **Title: Privacy Policy**

Revised: October 25, 2020.

Reviewed: September 14, 2021.

Signed & Approved by:

Kevin McLaughlin, Owner & Director

**This policy can be made available in an accessible format upon request.**

### **Objective**

Hockey Opportunity Camp (HOC) is committed to maintaining the privacy of our employees, guests, and associated persons.

### **Applicability**

This policy is applicable to all employees, guests, and associated persons of Hockey Opportunity Camp.

### **Policies**

## **Introduction**

Hockey Opportunity Camp ("HOC" or "We" or "Us") respects your privacy and we are committed to protecting it through our compliance with this Privacy Policy ("Policy"). This Policy describes how we collect, use, disclose, and protect the personal information of our campers, parents, caregivers and family members, as well as visitors to our Website ("you"). This Policy is not intended to apply to personal information about our employees or information that is not personal information.

This policy applies to information we collect, use, or disclose about you:

- On or through this Website.
- In correspondence; including email and text messages between you and us.
- When you interact with applications on third-party websites and services if those applications are linked to or include link(s) to this Policy.

The Website may include links to third-party websites, plug-ins, services, social





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networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. If you follow a link to a third-party website or engage a third-party plugin, please note that these third parties have their own privacy policies and we do not accept any responsibility or liability for these policies. We do not control these third-party websites, and we encourage you to read the privacy policy of every website you visit.

Please read this policy carefully to understand our policies and practices for collecting, processing, and storing your information. By accessing or using this Website, you indicate that you understand, accept, and consent to the practices described in this Policy, which may change from time to time. You are encouraged to check this Policy periodically for updates.

### **Personal Information**

Privacy laws in Canada generally define “personal information” as any information about an identifiable individual, which includes information that can be used on its own or with other information to identify, contact, or locate a single person. Personal information does not include business contact information, including your name, title, or business contact information.

HOC will obtain your consent prior to collecting, using or disclosing your personal information for any purpose. The form of consent that we seek will largely depend on the sensitivity of the personal information and the reasonable expectations you might have in the circumstances. As described in this Policy, we may rely on a third party to obtain your consent to the sharing of your personal information with us.

### **Compliance With Canadian Privacy Laws**

HOC is committed to meeting the standards prescribed by the *Personal Information Protection and Electronic Documents Act* and the Regulations thereunder (“PIPEDA”) as well as applicable provincial privacy legislation and regulations.

Schedule 1 to PIPEDA, contains the Principles Set Out in the National Standard of Canada (Model Code for the Protection of Personal Information). The 10 Privacy Principles contained in the Model Code outline the responsibilities that all organizations subject to the Act must follow.

These principles are:

- Accountability
- Identifying Purposes
- Consent





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- Limiting Collection
- Limiting Use, Disclosure, and Retention
- Accuracy
- Safeguards
- Openness
- Individual Access
- Challenging Compliance

## **Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)**

If you are a resident of the European Economic Area (“EEA”), we may be processing your information in order to fulfill actions you have asked of us (for example if you complete a registration to attend a camp program or have submitted a request for information through our Website). Our legal basis for collecting and using your personal information depends on the personal information we collect and the specific context in which we collect it. We may process your personal information because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it’s not overridden by your rights
- To comply with the law

## **Information We Collect**

We collect and use several types of information from and about you, including:

- Personal information, that we can reasonably use to identify you, such as your name, mailing address, e-mail address, telephone number, Internet protocol (IP) address used to connect your computer to the Internet, user name or other similar identifier, billing and account information and any other identifier we may use to contact you online or offline (“personal information”).
- Non-personal information that does not directly or indirectly reveal your identity or directly relate to an identified individual, such as demographic information, or statistical or aggregated information.
- Technical information, including your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, or information about your internet connection, the equipment you use to access our Website, and usage details.
- Non-personal details about your Website interactions, including the full Uniform





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Resource Locators (URLs), clickstream to, through and from our Website, pages or features you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, or any phone number used to call our customer service number.

We limit the collection of personal information to that which is reasonably required to fulfill the purposes for which it was collected.

### **How We Collect Information About You**

HOC will always collect your personal information by fair and lawful means. We may collect personal information in one or more of the following ways:

- You may provide information to us, as outlined below;
- As you navigate through our Website, information may be collected automatically through the use of cookies, web beacons, and other tracking technologies;
- Third parties may be authorized to give information about you under the terms and privacy policies of their respective services; and/or
- Information may be obtained through publicly available sources.

HOC uses a third-party provider of camp management software as a service, Campsite, for online camp registration and billing. The credit card information that you provide through Campsite is encrypted and transmitted directly to Campsite's payment services provider. We do not store your credit card information. You may find out more about how Campsite stores and uses your information by accessing their Privacy Policy at <https://campmanagement.com/privacy-policy/>

When we collect information about an individual who has not reached the age of majority, we do so on a limited basis and with the expectation of adult supervision or permission. For example, we may receive the name of a minor and associated adult contact information, as part of the registration process for one or more of our programs. In such cases, we strictly limit the use of that personal information to the purposes for which it was collected.

### **Information You Provide To Us**

The information we collect directly from you on or through our Website may include:

- Information that you provide by filling in forms on or available through our Website. For example, you may provide personal information when you make an inquiry or





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register your child for one of our programs.

- We may also ask you for information when you enter a contest or respond to a promotion or offer from us and when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete.
- Details of transactions you carry out through our Website.
- Your search queries on the Website.

You may also provide information to be published or displayed (“posted”) on public areas of the Website or transmitted to other users of the Website or third parties (collectively, “User Contributions”). Your User Contributions are posted on and transmitted to others at your own risk. Please note that we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions.

### **Use of Cookies and Other Tracking Technologies**

As you navigate through and interact with our Website, we may use cookies or other tracking technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically is statistical information and may include personal information and we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website





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according to your individual interests.

- Speed up your searches.
- Recognize you when you return to our Website.

You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's [website](#). If you disable or refuse cookies, please note that some parts of this Website may not be accessible or may not function properly.

### **Use and Disclosure of Your Information by Third Parties**

Some content or applications on the Website, including advertisements, are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use tracking technologies to collect information about you when you use our Website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioural) advertising or other targeted content.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of several third party ad servers' and networks' cookies simultaneously by using an opt-out tool created either by the [Digital Advertising Alliance of Canada](#) or the [Network Advertising Initiative](#). You can also visit these websites to learn more about online behavioural advertising and how to stop websites from placing cookies on your device. Opting out of a network does not mean you will no longer receive online advertising. It does mean that the network from which you opted out will no longer deliver ads tailored to your web preferences and usage patterns.

Our Website may rely upon a third party analytics service, Google Analytics to analyze how visitors use our Website. The information generated by cookies about your use of our Website (including your IP address) may be sent to a Google server in the United States and stored there. Google will use this information to evaluate your use of our Website, compile reports on Website activity for our Website operator and to provide other site activity related internet services. Additionally, Google may transfer this information to a third party when required by law or in the case of a third-party processing information on Google's behalf. In no case will Google use your IP address in connection with any other information held by Google. Should you wish to prevent





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your data from being collected and used in this manner, please visit:

<https://tools.google.com/dlpage/gaoptout?hl=en> to access the *Google Analytics Opt-out Browser Add-on*.

## How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information about our programs that you request from us.
- To fulfill the purposes for which you provided the information or that were described when it was collected, or any other purpose for which you provide it.
- To provide you with notices about your business relationship with us.
- To carry out our obligations and enforce our rights arising from any contracts with you, including for billing and collection or to comply with legal requirements.
- To notify you about changes to our Website or any programs or services we offer or provide through it.
- To improve our Website, programs or services, marketing, or customer relationships and experiences.
- To allow you to participate in interactive features, social media, or similar features on our Website.
- To measure or understand the effectiveness of the advertising we provide to you and others, and to deliver relevant advertising to you.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about our programs and services that may be of interest to you, as permitted by law. **Personal information is never sold to third-parties or used for any other marketing / communication purposes.** We communicate with our campers and their families about our programs, upcoming events and latest camp news. You have the ability to opt out of receiving this type of communication at any time by changing the email preferences in your account profile.





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If you require any assistance with your “unsubscribe” request, please email us at [privacy@learnhockey.com](mailto:privacy@learnhockey.com) .

## Disclosure of Your Information

We may disclose personal information that we collect, or you provide as described in this Policy:

- To contractors, service providers, and other third parties we use to support our business. These third parties are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this policy.
- To fulfill the purpose for which you provide it or for any other purpose disclosed by us when you provide the information.
- For other purpose(s), with your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law.
- To enforce or apply our Website Terms of Use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of HOC, our customers, or others.
- In accordance with applicable law, to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of HOC’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by HOC about our customers and users is among the assets transferred.

## Transferring Your Personal Information

We may transfer personal information that we collect or that you provide to contractors, service providers, and other third parties we use to support our business. Some of our service providers may access, process or store your personal information outside of Canada. We use reasonable safeguards such as contractual requirements to ensure that our service providers protect your personal information wherever it is used or







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stored. Whenever your personal information is used or stored in a jurisdiction other than Canada, it may be subject to the law of this foreign jurisdiction, including any law permitting or requiring disclosure of the information to the government, government agencies, courts and law enforcement in that jurisdiction.

## **Data Security**

The security of your personal information is very important to us. We use physical, electronic, and administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. We store all information you provide to us behind firewalls on our secure servers.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password, for example, during the registration process, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

## **Data Retention**

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

## **Children Who Visit Our Website**

We recommend that parents and guardians take steps to limit and monitor their children's Internet activities directly, or through software and other tools. If a visitor to our website is under 13 years of age, we require an indication of parental consent prior to the submission of personal information. We will not knowingly collect personal information from children under 13 without parental consent. If you are under 13, do not use or provide any information on this Website or on or through any of its features / register on the Website, make any purchases through the Website, use any of the interactive or public comment features or provide any information about yourself to us,





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without the consent of your parent or guardian. If we learn we have collected or received personal information from a child under 13 without verification of consent, we will delete that information.

### **Accessing and Correcting Your Personal Information**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes. By law, you have the right to request access to and to correct the personal information that we hold about you. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect. We may charge you a fee to access your personal information, however, we will notify you of any fee in advance.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

If you are concerned about our response to your request or would like to correct the information provided, you may contact our Privacy Officer at [privacy@learnhockey.com](mailto:privacy@learnhockey.com).

### **Withdrawing Your Consent**

Where you have provided your consent to the collection, use, and transfer of your personal information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact us at [privacy@learnhockey.com](mailto:privacy@learnhockey.com). Please note that if you withdraw your consent we may not be able to allow you to participate in our programs or provide you with our services. We will explain the potential impact(s) to you at the time to help you with your decision.

### **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page. We include the date our Privacy Policy was last revised at the top of the page. You are encouraged to visit our Website and review this Privacy Policy periodically in order to check for any changes.





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## Contact Information and Challenging Compliance

We welcome your questions, comments, and requests regarding this privacy policy and our privacy practices. Please contact us at:

### Hockey Opportunity Camp

Box 448

Sundridge, ON

P0A 1Z0

Attention: Privacy Officer

Toll-Free: 1 (888) 576-2752

1 (888) LRN-2PLA

We have procedures in place to receive and respond to complaints or inquiries about our handling of personal information, our compliance with this policy, and with applicable privacy laws. To discuss our compliance with this policy please contact our Privacy Officer using the contact information listed above.

## GDPR Privacy Notice

Our processing of personal data of people who are in the EEA is governed by the General Data Protection Regulation (the “GDPR”), which applies from May 25, 2018. The GDPR requires us to provide certain information to you about your personal data, which we refer to in this notice as your personal information.

Under the EU General Data Protection Regulation no 2016/679 (“GDPR”) you may be entitled to additional rights, including: (i) the right to withdraw consent to processing where consent is the basis of processing; (ii) the right to access your personal information and certain other supplementary information, under certain conditions; (iii) the right to object to unlawful data processing, under certain conditions; (iv) the right to erasure of personal information about you, under certain conditions; (v) the right to demand that we restrict processing of your personal information, under certain conditions, if you believe we have exceeded the legitimate basis for processing, processing is no longer necessary, or believe your personal information is inaccurate; (vi) the right to data portability of personal information concerning you that you provided us in a structured, commonly used, and machine-readable format, under certain conditions; (vii) the right object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you, under certain conditions; (viii) the right to lodge a complaint with data protection authorities.





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If you would like to learn more about your rights under the GDPR, you can visit the European Commission's page on Data Protection at:  
([http://ec.europa.eu/justice/data-protection/index\\_en.htm](http://ec.europa.eu/justice/data-protection/index_en.htm))

(For the purposes of applicable EU data protection law, we are a "data controller" of your personal information. Our servers are located in Canada in Toronto, Ontario.)



Hockey Opportunity Camp (2022)