NWTC Privacy Policy

1. Purpose and scope

New Westminster Tennis Club ("NWTC" or the "Club") is committed to protecting personal information in accordance with British Columbia's Personal Information Protection Act ("PIPA"). This policy describes how the Club collects, uses, discloses, protects, retains, and provides access to personal information relating to members, prospective members, guests, and other individuals who interact with the Club.

2. Accountability

The Club is responsible for personal information under its control, including information processed or stored by a service provider on the Club's behalf. The Board will designate a Privacy Officer responsible for overseeing compliance with this policy and PIPA. The Board will make the position title and contact information of the Privacy Officer available to members and the public.

3. Personal information

Personal information means information about an identifiable individual. Depending on the individual's relationship with the Club, this may include a name, personal contact information, membership and payment records, emergency-contact information, program and event participation, court-booking information, access credentials or identifiers, correspondence, incident information, photographs when consented to, and other information reasonably required for Club activities. The Club will not collect information merely because a form or system can store it.

4. Purposes for collection, use, and disclosure

The Club may collect, use, and disclose personal information where necessary to administer memberships and operate the Club, its facilities, programs, and activities. These purposes may include:

- processing membership applications and renewals.
- administering membership accounts, fees, payments, and records.
- communicating with members about Club governance, operations, programs, bookings, events, safety, and service matters.
- organizing tennis activities, programs, teams, tournaments, lessons, social events, and volunteer activities.
- establishing and administering member identification, security credentials and access to Club premises and facilities.
- supporting safety, emergency response, incident management, insurance, legal and regulatory requirements.
- protecting Club property, systems, members, guests, and volunteers; and
- conducting other reasonable administrative and operational functions that are consistent with the purposes identified to the individual.

The Club will collect, use, and disclose only the personal information necessary for an identified purpose and will not use or disclose it for a new purpose unless the Club obtains additional consent or PIPA otherwise permits the activity.

Approved by the Board: November 24, 2026

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5. Clubhouse access and security-service providers

Where reasonably necessary to establish or administer a member's electronic access to Club facilities, the Club may provide the member's name, email address, access status and any other information demonstrated to be reasonably necessary for that purpose to the Club's access-control service provider. A service provider may maintain a member's personal information and processed in a system or database separate from systems maintained directly by the Club.

The Club will provide members with a clear notice before or at the time the Club collects the information or transferred to the service provider. The notice will identify the information involved, the access-control purpose, the service-provider arrangement, and the consequence of declining or withdrawing consent. Where the Club requires a name and email address to create and administer an electronic access profile, providing that information may be a condition of receiving electronic clubhouse access. It will not be a condition of unrelated Club services unless necessary for those services.

A service provider may use the information only to provide contracted services to the Club or as otherwise authorized or required by law. The Club will use contractual and other reasonable measures appropriate to the sensitivity of the information to address confidentiality, safeguards, incident reporting, subcontractors, access and correction support, retention, return, and secure deletion.

6. Consent

The Club will obtain consent for the collection, use or disclosure of personal information except where PIPA authorizes or requires otherwise. Consent may be express or implied depending on the circumstances, the sensitivity of the information and the reasonable expectations of the individual. For material disclosures to an external access-control provider, the Club will use a clear notice and affirmative acknowledgement where practicable.

An individual may withdraw consent on reasonable notice, subject to legal or contractual restrictions. The Club will explain the consequences of withdrawal. For example, if the access-control provider cannot create or maintain a secure access profile without the required information, the Club may be unable to provide electronic clubhouse access. The Club will consider any reasonable alternative that preserves security which the Club could administer without disproportionate burden, but this policy does not guarantee that an alternative access method will be available.

7. Service providers and other disclosures

The Club may disclose limited personal information to service providers that perform services for or on behalf of the Club, including membership administration, information technology, payment processing, communications, court bookings, facility access, and security. The Club will limit each disclosure to what is necessary for the applicable purpose. The Club may also disclose information where authorized or required by PIPA or other law, including in response to a valid court order, subpoena, warrant, or other lawful requirement.

8. Accuracy

The Board will make reasonable efforts to ensure that personal information is accurate and complete where the Club is likely to use the information to make a legal decision affecting an individual or disclosed to another organization. Members are responsible for providing current information and may request correction of errors or omissions.

9. Safeguards and privacy incidents

The Club will use reasonable administrative, physical, and technological safeguards appropriate to the nature, quantity, and sensitivity of the personal information. The Board will limit access to members' personal information to individuals and service providers who require it for authorized purposes. The Club will immediately report any suspected loss, unauthorized access, use, or disclosure to the Privacy Officer. The Club will take reasonable steps to contain, investigate, and remediate a privacy incident and will provide notifications where appropriate or legally required.

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10. Retention and secure disposal

The Club will retain personal information only for as long as reasonably necessary to fulfil the identified purposes and any legal or business requirements. When a membership or need for facility access ends, the Club will arrange for access credentials to be deactivated and for associated personal information to be securely deleted or de-identified when retention no longer serves the purpose and is no longer necessary for legal or business purposes. The Board will retain information used to make a legal decision that directly affects an individual for at least one year after the decision where PIPA requires.

11. Access and correction requests

Subject to PIPA, an individual may request access to personal information about them under the Club's control, information about how the Board has used the information, and the names of individuals and organizations to which the Board has disclosed the information. An individual may also request correction of an error or omission. Individuals must make a request in writing to the Privacy Officer. The Board may require reasonable proof of identity and will respond within the time required by PIPA, subject to permitted extensions and exceptions.

12. Questions and complaints

Individuals with questions, requests or complaints about this policy or the Club's handling of personal information may contact:

Privacy Officer	President
Email	president@nwtennis.com

If the Privacy Officer has not resolved a concern, an individual may contact the Office of the Information and Privacy Commissioner for British Columbia.

13. Review and changes

The Board will review this policy periodically when there is a material change to the Club's practices, service providers, categories of information or purposes. The Club will provide reasonable notice of material changes and obtain additional consent where required.