



## **Introduction**

The Bermuda Olympic Association (BOA) is obligated to protect the privacy of personal information in compliance with the Bermuda Personal Information Protection Act of 2016 (PIPA). The BOA's Privacy Policy details the protection procedures of how data information is collected, used and stored according to the requirements of PIPA. Stakeholders who engage with the BOA, whether it be National Sport Governing Bodies, athletes, officials, volunteers or employees will acknowledge and agree on how personal information is processed according to the PIPA Act of 2016.

## **Personal Data Collection**

Your personal information that you provide to the Bermuda Olympic Association is necessary to conduct programming. From a legal standpoint, in accordance with PIPA, the BOA will process your personal information and thus will need:

1. Consent

Once your consent is received in writing, the BOA will process your personal information as requested for office operations. At any time, you can withdraw your consent but this may affect, especially athletes or officials, the opportunity to represent Bermuda in international sports festivals. Personal data is often required by host event administration and sport organizational authorities.

2. Performance of a Contract

Once we receive your consent to process your personal information, this will reflect on the requirements necessary to fully complete office obligations and contracts required to service you. This may include representing Bermuda or fulfilling business obligations related to the BOA.

3. Legitimate Interests

The BOA will process your information only when necessary to fulfill our legitimate business obligations and requirements. These requirements do not jeopardize your interests, rights and freedoms. As an example, listed below are some of the reasons why your personal information may be used:

How does the BOA process your information?

The BOA processes your information to provide information to international sporting organizations, as an example, but not limited to, international sports festivals. We provide this information to verify and administer proper entries, eligibility, compliance and national representation to such games, with your consent. Organizations:

Bermuda Olympic Association (BOA)  
Caribbean National Olympic Committee (CANOC)  
Centro Caribe Sports (CCS)  
Pan Am Sports (PAS)  
Commonwealth Games Federation (CGF)  
International Olympic Committee (IOC)

1. To gather passport, uniform sizes and medical information for international games representation.
2. To input information into the Games Management System for the Central Caribbean and Caribbean Games;
3. To input information into the Games Management System for the Caribbean Games;
4. To input information into the Games Management System for the Pan American Games;
5. To input information into the Games Management System for the Junior Pan American Games.
6. To input information into the Games Management System for the Commonwealth Games.
7. To input information into the Games Management System for the Youth Commonwealth Games.
8. To input information into the Games Management System for the Olympic Games; and
9. To input information into the Games Management System for the Youth Olympic Games.

## **Cookie Policy**

### What is a Cookie?

Information may be sent to your computer in the form of an internet “cookie” to allow our servers to monitor your requirements. The cookie is stored on your computer. Our server may request that your computer return a cookie to it.

These return cookies do not contain any information supplied by you or any personally identifiable information about you.

### Strictly Necessary Cookies

These cookies are essential in order for you to move around the website and use its features, such as accessing areas of the website.

### Performance Cookies

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages.

These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how the website works.

### Contact Information

If you leave a comment on the BOA website you may opt-in to saving your name, e-mail address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

### Website Links

Any links found on the BOA website (i.e. related organizations and sponsors) have their own cookie and privacy policies and by linking to them you are under those policies.

### Disabling Cookies

A guide to how to [enable and disable cookies](#) on every web browser.

## **Retention and Deletion**

All personal data are protected through technical and administrative processes to secure your personal information. Due to hackers, cybercriminals or other intruders we cannot guarantee or promise that this information cannot be collected, modified or stolen. The BOA reminds you that we have taken all the precautions necessary to ensure information is encrypted.

Some information the BOA requires to keep in perpetuity. This is primarily key personal data (Names, e-mail, phone) linked to historical Games and Festival participation.

Other key data will be reviewed for deletion and a five (5) year cycle linked to Games and Festival cycles, quadrennials.

Data not related to historical purposes or active athlete campaigns may be reviewed annually from the creation date of the record for deletion based on our Data Privacy Policy.

At any time, you have the ability to change or access your information that the BOA collects, according to the Bermuda laws. If personal information needs to be reviewed, changed or deleted, please contact the BOA office at (441) 295-7146 or email [admin@olympics.bm](mailto:admin@olympics.bm).

## **Your Rights to Personal Data**

The BOA does not sell personal data to third parties. You will always have the right to your personal data with the following guidelines:

1. Right to know how we are processing your data.
2. Right to have the ability to access any or all your data.
3. Right to have data deleted after being processed.
4. Right to ask for changes for mistakes or incorrect data.

Verification Process: At times the BOA may ask for additional or verification of information as requested by international sport organizations that are hosting sports festivals.

## **Changes**

When necessary, the BOA will update this Privacy Notice as required by Bermuda's laws. In the case of an updated notice, we will indicate this with a "Revised" date effective immediately on [www.olympics.bm](http://www.olympics.bm). We encourage you to read the privacy notice on a regular basis to make note of any such changes. The BOA may notify our stakeholders via email if there are any changes to the privacy notice.

## **Complaints**

Written complaints are accepted if there are concerns about:

- Personal information collection.
- How the information is being shared;
- Who the information is being shared with; and
- How the BOA processes, stores or handles personal data.

It is important to note that the privacy of the Bermuda Olympic Association is not covered by PIPA regulations. This only relates to the privacy of the rights of individuals.

### Complaint Submission

To submit a complaint, include in the letter the following;

- Name of person submitting the complaint;
- Contact information of person submitting the complaint: email, phone number, address;
- The nature of the complaint with specific written description;
- How the BOA can resolve your complaint; and
- Submit complaint via email or by phone.

If you have any questions, concerns or complaints contact:

Tom Clarke  
Privacy Officer  
Bermuda Olympic Association  
22 Church Street, Suite 316  
Hamilton, HM 11

### Evaluation Process

1. The BOA will respond to your request within 5 business days.
2. The BOA will review your request to determine if it is a redress, procedural, operational or organizational error. If we are unable to address the issue it will be referred to an organization or agency.
3. The Privacy Officer will review the complaint then make any recommendations with possible actions that need to occur. The BOA will communicate with you with a response or any action that needs to be taken.
4. The BOA will review and resolve any complaints within 20 business days. If there is a delay or more time is required, you will be contacted by the Privacy Officer.

## **Contact Us**

Questions or comments pertaining to the BOA Privacy Notice can be directed to the BOA's Data Privacy Officer (DPO), Tom Clarke, by email at [2ndvpnocbermuda@olympics.bm](mailto:2ndvpnocbermuda@olympics.bm) by phone (441) 295-7146 or by post:

Bermuda Olympic Association  
22 Church Street, Suite 316  
Hamilton, HM 11  
Bermuda

If you are a resident of Bermuda, the Bermuda Olympic Association is the "Privacy Officer" of your information. Bermuda Olympic Association has appointed Tom Clarke to be its representative. You can contact the BOA directly regarding the processing of your information either by email ([2ndvpnocbermuda@olympics.bm](mailto:2ndvpnocbermuda@olympics.bm)) or by visiting PIPA personnel at the Privacy Commissioner's office ([privcom@privacy.bm](mailto:privcom@privacy.bm)):

Maxwell Roberts Building  
4th Floor  
1 Church Street  
Hamilton, HM11  
Bermuda  
(441)543-7748

If you are a resident outside of Bermuda, the Privacy Officer of your personal information is the Bermuda Olympic Association. The BOA has appointed Tom Clarke to be our representative and you can contact him via email, [2ndvpnocbermuda@olympics.bm](mailto:2ndvpnocbermuda@olympics.bm) or by phone (441) 295-7146 or by post:

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