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Wavecrest Aquatics Privacy Policy

Policy Title: Privacy Policy
Approval Date: April 17, 2026
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Policy

Wavecrest Aquatics Inc. (the “Company”) is committed to protecting the privacy and security of Personal Information, as defined herein, of those who participate in its programs and services. This Privacy Policy describes how Wavecrest Aquatics (also referred to as “we” or “us”) collects and uses Personal Information about you during and after your participation in those programs and services.

Scope

This policy applies to all directors, employees, staff, and any other individuals who may be retained by the Company to assist with its programs and services and come into contact with the personal information of clients or participants.

Purpose

This Privacy Policy describes the categories of Personal Information that we collect, how we use your Personal Information, how we secure your Personal Information, and when we may disclose your Personal Information to third parties if required for Company business. This Privacy Policy also describes your rights regarding the Personal Information that we hold about you and how you can access, correct, and request erasure of your Personal Information.

We will only use your Personal Information in accordance with this Privacy Policy unless otherwise required or permitted by applicable law. We take steps to ensure that the Personal Information that we collect about you is adequate, relevant, not excessive, and used for limited purposes.

Definitions

“Personal Information” has the meaning given to that term in *The Freedom of Information and Protection of Privacy Act* of Manitoba (“FIPPA”) and includes:

1. Personal information about an identifiable individual which is recorded in any manner, form, or medium; and
2. Personal health information about an identifiable individual as defined in *The Personal Health Information Act* of Manitoba.

“Representative” means the directors, officers, employees, agents and subcontractors of the Company.

Collection of Personal Information

To carry out our activities and obligations as a program and service provider we may collect, store, and use the following categories of Personal Information, in order to administer the programs/services, including, but not limited to:

- Personal contact details such as name, title, addresses, telephone numbers, and personal e-mail addresses.
- Date of birth
- Gender/sex.
- Emergency contact information.
- Government identification numbers such as social insurance or other national insurance number, driver’s license number, or other identification card number as required.
- Insurance enrollment information.
- Proof of pre-requisite certifications from other training agencies or companies as required.

Personal Information Use

We only use your Personal Information where applicable law permits or where reasonably necessary for the administration of our programs/services. For example, we may also use your Personal Information for the following legitimate business purposes:

- Mailing out certificates
- Administration of any contract or funding agreement entered into with a government agency or level of government.
- Compliance with applicable laws.
- Education, training, and development requirements.
- Complying with health and safety obligations

We will only use your Personal Information for the purposes that we collected it for or as otherwise permitted by FIPPA or other legislation. If we need to use your Personal Information for a non-permissible purpose, we will notify you and, if required by law, seek your consent. We may use your Personal Information without your knowledge or consent where required by

applicable law or regulation.

Access to your Personal Information will be limited to those Representatives of the Company who need to know the information to carry out the purpose for which it was collected and who shall use the Personal Information as minimally as possible for that purpose. Every Representative of the Company who is permitted to access Personal Information shall enter into a confidentiality pledge with the Company acknowledging their obligations hereunder.

The Company shall not alter, copy, link, modify, or reproduce Personal Information without authorization, except where necessary to carry out the purpose for which the Personal Information was collected.

Disclosure of Personal Information

The Company, or its Representatives, shall not disclose, give access to, or reveal Personal Information, except in accordance with FIPPA, or the following:

- To you, upon satisfactory proof of identity;
- To any person, business, corporation, entity, or organization with informed consent;
- In order to administer any contract or funding agreement entered into with a government agency or level of government;
- Where the Personal Information is about a child under the age of 18 years, to the custodial parent, or parents, or to the legal guardian of the child, upon satisfactory proof of identity and authority, provided that the Company is of the opinion that the disclosure would not constitute an unreasonable invasion of the child's privacy;
- Where disclosure is authorized or required by legislation;
- Where disclosure is required by an order of a court, person, or body with jurisdiction to compel production of the Personal Information or disclosure is required to comply with a rule of court that related to the production of the Personal Information; or
- Where disclosure is necessary to prevent or lessen a serious and immediate threat to the health or safety of the individual to whom the Personal Information refers or of any other individual or individuals.

Data Sharing

We will only disclose your Personal Information to third parties where required by law or to our employees, contractors, designated agents, or third-party service providers who require it to assist us with administering the programs/services, including third-party service providers who provide services to us or on our behalf.

The Company will not sell or disclose your Personal Information in exchange for any money, goods, services, or benefits, or give your Personal Information to any individual, corporation, business, agency, organization, or entity for any purpose, including (but not limited to)

solicitation for charitable or other purposes.

We require all our third-party service providers, by written consent, to implement appropriate security measures to protect your Personal Information consistent with our policies and any data security obligations applicable to us. We do not permit our third-party service providers to use your Personal Information for their own purposes. We only permit them to use your Personal Information for specified purposes in accordance with our instructions.

Data Security

We have implemented appropriate physical, technical, and organizational security measures designed to secure your Personal Information against accidental loss and unauthorized access, alteration, disclosure, or use. In addition, we limit Personal Information access to those Representatives that have a legitimate business need for such access.

Where paper records of Personal Information are kept, they are accessible only to those Representatives who need to know the Personal Information and placed in physically secure areas.

Where digital records of Personal Information are kept, they are accessible only to those Representatives who need to know the Personal Information and are protected by a series of passwords only available to those Representatives who need to access the Personal Information.

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 accounting, legal, 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. Once your Personal Information is no longer required we will securely destroy your Personal Information in accordance with the principles of this Policy, applicable laws and regulations.

Rights of Access, Correction, Erasure, and Objection

It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes. You may request access to and to correct the Personal Information that we hold about you, or withdraw your consent to the use of your Personal Information under certain circumstances. If you want to review, correct, verify, or withdraw consent to the use of your Personal Information, please contact us at Wavecrest Aquatics using the contact information given at the end of this policy. Any such

communication must be in writing. We may charge you a fee to access your Personal Information. If a fee applies for access 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 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.

Right to Withdraw 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, please contact us at Wavecrest Aquatics using the contact information given at the end of this policy.

Violation of Policy

The Company shall provide training to its Representatives regarding the requirement of this Policy. Any violation of this Policy may result in corrective action, up to, and including, termination of employment for cause.

Data Privacy Officer

We have appointed a Data Privacy Officer to oversee compliance with this Privacy Policy. If you have questions about this Privacy Policy or how we handle your Personal Information or would like to request access to your Personal Information, please contact the Data Privacy Officer at Wavecrest Aquatics using the contact information given at the end of this policy.

Amendment

We reserve the right to update this Privacy Policy at any time. If we would like to use your previously collected Personal Information for different purposes than those that we have notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your Personal Information for a new or unrelated purpose. We may use your Personal Information without your knowledge or consent where required or permitted by applicable law or regulation.

Contact Us

Wavecrest Aquatics Inc.
Data Privacy Officer

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