



TORONTO INTERNATIONAL FOOTBALL ACADEMY (TIFA)

WEST HAM FOUNDATION TORONTO

PRIVACY POLICY

Effective: 2026/27 Season

1. PURPOSE

Toronto International Football Academy (“TIFA,” “the Academy,” “the Club,” “we,” “us,” or “our”) respects the privacy of our players, parents/guardians, coaches, staff, volunteers, and other individuals who interact with our programs.

We are committed to handling personal information responsibly and using it only for legitimate purposes connected with the administration, operation, safety, development, and delivery of our football programs and related activities.

This Privacy Policy explains how we collect, use, disclose, protect, retain, and manage personal information.

2. INFORMATION WE MAY COLLECT

Depending on the program or activity, the Club may collect information including:

Player Information

- Full legal name;
- Preferred name;
- Date of birth;
- Gender, where required;
- Home address;
- Player photograph;
- Playing position;

- Team and age group;
- Player history and development information;
- League or governing-body registration information; and
- Other information required for football administration.

Parent/Guardian Information

- Parent/guardian name;
- Relationship to the player;
- Address;
- Email address;
- Telephone number; and
- Emergency contact information.

Health & Safety Information

Where reasonably necessary for safe participation, we may collect information voluntarily provided by a parent/guardian regarding:

- Allergies;
- Injuries;
- Medical conditions relevant to participation;
- Medications relevant to emergency response;
- Participation restrictions;
- Emergency instructions; and
- Return-to-play information.

Parents/guardians should provide only information reasonably necessary for the safe participation of their child.

Registration & Financial Information

- Registration status;
- Program selection;
- Payment status;

- Invoice and transaction records;
- Discounts, credits, or payment-plan information;
- Uniform orders and sizes; and
- Other information necessary to administer a player's account.

Payment-card information may be processed directly by the Club's third-party payment provider rather than stored directly by the Club.

3. HOW WE COLLECT INFORMATION

Personal information may be collected through:

- Online registration forms;
- Club website forms;
- Tryout and evaluation forms;
- Email;
- Telephone;
- Team-management applications;
- Payment and registration platforms;
- Uniform orders;
- Tournament or travel registrations;
- Player evaluations;
- Communications with parents/guardians;
- League and governing-body registration processes; and
- Other interactions with the Club.

4. WHY WE COLLECT AND USE PERSONAL INFORMATION

The Club may use personal information for legitimate purposes including:

- Processing registrations;
- Confirming player eligibility;
- Creating teams and training groups;

- Registering players with leagues and governing organizations;
- Communicating schedules and program information;
- Managing training sessions and matches;
- Maintaining emergency contact information;
- Supporting player health and safety;
- Administering payments and invoices;
- Managing uniforms and equipment;
- Tournament and competition registration;
- Player identification;
- Player development and assessment;
- Match and training analysis;
- Insurance and risk-management requirements;
- Safeguarding;
- Responding to parent/player inquiries;
- Managing complaints or disciplinary matters;
- Maintaining appropriate Club records; and
- Meeting applicable legal, regulatory, league, governing-body, or insurance requirements.

We will seek to limit collection and use to information reasonably necessary for the applicable purpose.

5. INFORMATION ABOUT MINORS

Because the Club provides youth football programs, much of the personal information we handle relates to individuals under 18.

Parents/legal guardians are generally responsible for providing registration and other required information on behalf of minor players.

Information concerning minors should be handled with particular care and only accessed or disclosed where reasonably necessary for legitimate Club purposes.

Coaches, staff, volunteers, parents, and players are expected to respect the privacy of all youth participants.

6. PLAYER PHOTOGRAPHS

The Club may require a current player photograph for legitimate administrative purposes such as:

- Player identification;
- Internal player records;
- Team administration;
- League registration;
- Competition registration; and
- Other football-administration requirements.

Providing an administrative identification photograph does **not automatically constitute consent for the Club to use that photograph for public promotional purposes.**

Promotional photography and video should be addressed separately through the Club's **Photo & Media Consent** process.

7. VIDEO & PERFORMANCE ANALYSIS

Matches or training sessions may be recorded using Veo or other approved video/performance-analysis technology.

Recordings may be used for legitimate football purposes including:

- Player development;
- Coaching;
- Tactical analysis;
- Performance review;
- Team analysis;
- Coach education; and
- Appropriate football-development activities.

Access to recordings may be limited to authorized coaches, staff, players, parents/guardians, or other appropriate individuals.

Where recordings are proposed for public promotional use, the Club's applicable media-consent requirements will apply.

8. DISCLOSURE OF PERSONAL INFORMATION

The Club may disclose relevant personal information where reasonably necessary to organizations or individuals involved in delivering or administering Club programs, including:

- Authorized Club staff;
- Coaches;
- Team managers;
- Leagues;
- Governing soccer organizations;
- Tournament and competition organizers;
- Insurance providers;
- Registration and team-management service providers;
- Payment processors;
- Technology providers;
- Travel or event providers where applicable; and
- Other service providers reasonably required for Club operations.

The Club should disclose only the information reasonably necessary for the relevant purpose.

We may also disclose information where required or permitted by applicable law, including circumstances involving safety, safeguarding, legal obligations, or lawful requests.

9. CONFIDENTIAL & SENSITIVE INFORMATION

The Club recognizes that certain information requires additional care, including:

- Medical information;
- Injury information;
- Safeguarding information;

- Disciplinary records;
- Financial information;
- Family circumstances; and
- Other sensitive personal information.

Access should be limited to individuals who reasonably require the information to perform their responsibilities.

Sensitive information should not be distributed through general parent chats or other inappropriate channels.

10. TEAM ROSTERS & CONTACT INFORMATION

Player or parent contact information must not be used for unauthorized commercial solicitation or unrelated purposes.

Parents, players, coaches, team managers, and staff who receive team information must respect its confidentiality.

Team lists, telephone numbers, email addresses, dates of birth, home addresses, medical information, or other personal information should not be distributed outside legitimate Club activities without appropriate authorization.

11. PHOTOGRAPHY, SOCIAL MEDIA & PROMOTIONAL USE

The Club may create photographs, videos, match highlights, interviews, and other media during Club activities.

Public or promotional use may include the Club's:

- Website;
- Social-media accounts;
- Newsletters;
- Advertising;
- Promotional materials;
- Program announcements; and
- Other official Club communications.

For minor players, promotional media use should be governed by the Club's applicable **Photo & Media Consent** process.

Your existing Code of Conduct currently provides that photographs and videos may be used for promotional, educational, and development purposes. I recommend replacing that general provision with your new separate media-consent process so that privacy acknowledgment and promotional consent are clearly distinguished.

12. PROTECTION & SECURITY OF INFORMATION

The Club will take reasonable administrative, organizational, and technical measures appropriate to the information being handled to protect personal information against:

- Unauthorized access;
- Unauthorized disclosure;
- Loss;
- Theft;
- Misuse;
- Alteration; and
- Improper destruction.

Access to Club records should be limited according to role and legitimate operational need.

No electronic system can guarantee absolute security, but the Club will take reasonable measures to protect the information under its control.

13. RETENTION OF INFORMATION

The Club may retain personal information only for as long as reasonably necessary to:

- Administer the player's participation;
- Maintain appropriate Club records;
- Address financial or registration matters;
- Meet insurance requirements;
- Address disputes or complaints;
- Meet safeguarding requirements; and

- Satisfy applicable legal, regulatory, league, or governing-body requirements.

Different categories of information may require different retention periods.

When information is no longer reasonably required, the Club should securely destroy, delete, or anonymize it, subject to applicable retention obligations.

14. ACCURACY OF INFORMATION

Parents/guardians are responsible for providing accurate information and notifying the Club of important changes.

This includes changes to:

- Contact information;
- Home address;
- Emergency contacts;
- Relevant medical information;
- Custody/contact restrictions communicated to the Club where applicable; and
- Other information necessary for safe and effective participation.

15. ACCESS & CORRECTION REQUESTS

Parents/guardians may contact the Club to request correction of inaccurate personal information relating to themselves or their minor child.

Requests for access to personal information may also be submitted to Club administration and will be considered subject to applicable privacy requirements and any legitimate restrictions, including the privacy rights of other individuals.

The Club may take reasonable steps to verify the identity and authority of a person making a request.

16. THIRD-PARTY SERVICES

The Club may use third-party providers for services such as:

- Registration;
- Payments;
- Team management;
- Email communication;

- Video analysis;
- Website hosting;
- Cloud storage; and
- Other administrative or technology services.

Information processed through third-party services may also be subject to the applicable provider's privacy practices and terms.

The Club should select service providers appropriate to the nature of the information being processed and limit information shared to what is reasonably required.

17. PRIVACY BREACHES

If the Club becomes aware of unauthorized access, loss, disclosure, or misuse of personal information, it will assess the circumstances and take reasonable steps appropriate to the nature and seriousness of the incident.

This may include securing affected information, investigating the incident, taking corrective action, and providing notifications where required.

18. PRIVACY QUESTIONS OR CONCERNS

Questions, requests, or concerns regarding this Privacy Policy or the Club's handling of personal information may be directed to:

Toronto International Football Academy (TIFA)

West Ham Toronto

Email: register@torontofa.com

Please include sufficient information for the Club to identify and respond to the request.

19. CHANGES TO THIS POLICY

The Club may update this Privacy Policy from time to time to reflect changes in Club operations, technology, governing-body requirements, or applicable privacy requirements.

The current version will be made available through the Club's registration system, website, or other appropriate communication channel.