

<b>5.02 Privacy</b>	Committee Oversight: Board of Directors	Effective date: November 2019
<b>Approval:</b> Board of Directors		Scheduled Review: Five years
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**Purpose:** The purpose of this policy is to outline what donors, grantees, volunteers and employees can expect regarding the collection and use of personal information.

**Scope:** This policy applies to all donors, volunteers, employees and contractors

**Our commitment:** The Sarnia Community Foundation is committed to protecting the privacy of personal information of current and potential donors, current and potential grantees, employees, volunteers and other individuals associated with the Foundation in a manner consistent with the provisions of the PIPEDA (*Personal Information Protection and Electronic Documents Act*). We value the trust of those that deal with us and of the public and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the personal information shared with us.

During the course of our activities as a foundation, we gather and use personal information. Anyone from whom we collect such information should expect that it will be carefully protected and that any use of or other dealing with this information will be subject to consent. Our practices are designed to achieve this.

**What is Personal Information:** Personal information is any information about an identifiable individual but does not include the name, title, or business address, telephone number or email of an employee of an organization. Personal information may include: for example, age, name, address, personal email address, telephone number, date of birth, income, numerical identifiers, gender, ethnic origin, social status, financial information, employment information and credit card number.

**Privacy Practices:** Personal information collected by the Foundation is kept in confidence. The Foundation staff is authorized to access personal information based only on their need to deal with the information for the reason it was obtained.

### **Our Privacy Principles**

The following principles reflect our pledge to protect the privacy of your personal information:

1. **Accountability**

The Foundation is responsible for all personal information in our possession, including any personal information transferred to third parties for handling, auditing, legal or regulatory purposes.

We keep your personal information in strict confidence. All employees, agents (including authorized volunteers) and authorized service providers of the Foundation are required to

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protect the confidentiality of your personal information. All employees and agents are required to sign and adhere to a Code of Conduct & Ethics which ensures they are informed about the importance of privacy protection. The Foundation reviews this policy every five (5) years and whenever there is a legal or regulatory change. Periodic information is provided to our employees, volunteers and donors to ensure they are knowledgeable about our privacy policy and privacy related activities.

Where we are required to provide information to a third party for the purposes of auditing or to fulfill a legal or regulatory requirement, we take all reasonable precautions to ensure that your personal information is protected and at minimum the third party upholds standards comparable to our own.

**2. Identifying Purposes**

We collect, use and disclose personal information only for certain purposes that we identify to you. The purposes for which personal information is collected will be identified at the time the information is collected. With your consent, we collect information about you for various purposes, including the following:

- To establish your identity
- To administer your involvements with us, including your donations, event participation, community engagements, volunteering, or employment, and contact you about your continued involvement
- To familiarize ourselves with our donors, grantees, volunteers and other supporters in order to manage and develop our resources to fulfill our mission to serve the greater good of the community.
- To respond to your information requests
- To periodically, as we are able, send you literature from the Foundation or invite you to events or information sessions that are aligned with your interests
- To thank you and, with your consent, publicly recognize your financial or non-financial contributions.
- To share information with other individuals or organizations, including organizations which you redirect donations to, volunteer at on our behalf, or interact with on our behalf.
- To generate statistics and aggregate reporting to help us understand where we can have greater impact on the community
- To meet legal and regulatory requirements.

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### 3. **Consent**

We obtain personal information about you lawfully and fairly. We collect, use or disclose your personal information with your permission, except where otherwise required or permitted by law.

Your permission may be expressed (orally, electronically or in writing) or may be implied (by an action or inaction). You may withdraw your permission to the use and disclosure of your personal information at any time. We will comply, subject to legal, contractual or technical restrictions. For example, if you ask to not receive any mail from us, we take steps to suppress donation requests or general information, but we will still mail you a tax receipt for a donation or send you a statement of your outstanding payments against your pledged donation. Due to printing and distribution schedules, you may continue to receive some communications that were in process before we received your request. If there are various options to how we may handle your request, we will explain the options so that you can choose how you wish us to handle your request.

### 4. **Limiting Collection**

Personal information collected will be limited to that required for the purposes identified by us.

### 5. **Limiting Use, Disclosure and Retention**

We use your information for the purposes identified to you. When we intend to use your personal information for a purpose not identified to you when the information was collected, we will identify the new purpose and obtain your permission prior to use.

We do not sell your personal information.

We disclose your personal information in the following circumstances:

- **Donors**

- We collect, use and disclose personal information only for the purposes that reasonable person would consider appropriate in light of the relationship with the foundation. Donors have a right to decline communication from the Foundation at any time. We do not sell, rent, exchange or trade our list of donors. We do not disclose email or other personal information about our donors. All donations and donation amounts are kept confidential unless otherwise authorized in writing by the donor

- **Grants**

- Grant applications and the deliberations of the grants committee are kept in confidence. Grant applications are not to be retained by committee members for any period longer than the decision making process. Committee members are to be informed by the Chair of the committee and/or the Chair of the Board of the privacy practices related to the grants process.

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- Successful grant applicants will be informed by letter and the Foundation will require a release of information regarding the project and how the funds are to be used prior to the release of the funds. Photos of grant recipients and projects will not be used without a signed release of information. One copy of the application will be kept on file at the Foundation office for a period of seven years. All other copies will be destroyed immediately following the grant presentation.
- Unsuccessful applicants will be informed by letter and their application and copies destroyed within ten days of the notification.
- **Website**
  - The Sarnia Community Foundation respects the privacy of the individuals who visit our website. The site does not automatically gather personal information, such as an email address, during the visit. Information voluntarily supplied by and individual through contact via email or the completion of a form may be kept for the purpose that it was provided and becomes subject to the Foundation general privacy policies. Information about the number of times the page is visited, how much time was spent on the site and the number of times a link is used may be collected to help improve the performance of the site and its contents. The Foundation makes no attempt to link this information with any one individual unless an attempt to damage the site has been detected.
  - Sites that are linked to the Foundation’s website are entirely independent from the Foundation and provided as a convenience. The Sarnia Community Foundation is not responsible for the accuracy, reliability, currency and security on any linked site. Viewers are advised to read and understand the privacy policy of any third party site that they visit.
  - The site’s content is provided strictly to act as a resource about the program and activities of the Sarnia Community Foundation and community foundations in general. It is provided on as ‘as is’ basis and may be subject to change or updating at any time without prior notice.

We will keep your personal information only as long as it is necessary to satisfy the purposes for which it was obtained, or as required by law. We have guidelines and procedures for the retention and destruction of personal information. When we destroy personal information, we will use safeguards to prevent unauthorized parties from gaining access to that information during the process.

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## 6. Accuracy

We maintain appropriate procedures to ensure that personal information in our possession is as accurate and up to date as is necessary for the purposes for which it is to be used. We rely on you to provide us with any changes to your personal information, and in particular to your contact information.

If you believe any of the information we have collected about you is incorrect or incomplete, you have the right to ask us to change it or delete it. If your personal information is inaccurate or incomplete, we will make the necessary changes.

## 7. Safeguards

We maintain appropriate technical and organizational safeguards to protect your personal information against loss, theft, unauthorized access, disclosure, copying, use or modification.

Access to your personal information is restricted to the Foundation employees, agents who need the information to fulfill the purpose for which the information was collected. The Foundation will protect your personal information by safeguards that are appropriate to the sensitivity of that information and the format of the information, whether electronic or physical.

Our procedures include physical security measures, organizational measures including limiting access on a "need-to-know" basis, and technological measures such as the use of passwords and encryption. When it comes to the handling of electronic records, the Foundation adheres to Payment Card Industry Data Security Standards

## 8. Openness

The Foundation's Privacy Policy is available to you at all times on our website. If you are unable to access our website or require our policy in another format, we will do our best to provide it in an alternative format that meets your requirements.

## 9. Individual Access

You may ask whether we hold any personal information about you, see your information and ensure that it is accurate. The Foundation may ask that you submit your request in writing. The Foundation will need to confirm your identity prior to disclosing any information to you, and may charge a reasonable fee to cover the cost of providing the information to you. If a fee is charged, The Foundation will inform you of the approximate cost prior to providing the information to you.

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You also have the right to know how we collected your personal information and how we are using it. We will inform you of the specifics to the best of our abilities.