

# **Donor Privacy Policy**

## 1. PURPOSE

This policy outlines the commitment to donor privacy by Rideauwood Addiction and Family Services ("Rideauwood") and establishes the methods by which the organization ensures such privacy.

#### 2. SCOPE

This policy addresses the manner in which Rideauwood protects the privacy of the information of its donors and other agency supporters ("donor(s)"). Client confidentiality and other related matters are addressed in Rideauwood's policies 5.03 Privacy, 1.08 PIPEDA and 1.13 Confidentiality.

## 3. TERMS & DEFINITIONS

**Personal information** is any information that can be used to distinguish, identify, locate or contact a specific individual or a group of individuals. This information may also include an individual's opinions, beliefs, wealth, as well as facts about or related to the individual and/or spouse and family.

**Business information** is confidential information related to a specific business that is not readily available to the public, such as names of executive officers, business registration numbers, proprietary information, and financial status. Business information is treated and handled with the same level of confidentiality, privacy and respect as personal information.

#### 4. POLICY STATEMENTS & PROCEDURES

Rideauwood is committed to protecting the privacy of its donors.

Rideauwood embraces the principles of Canada's Privacy Act; observes the requirements of the *Personal Information Protection and Electronic Documents Act* ("PIPEDA"), Canada's Anti-Spam Legislation (CASL); and upholds the Association of Fundraising Professionals' Donor Bill of Rights.

Rideauwood ensures that all personal information is properly collected, is used only for the purposes for which it is collected and is disposed of in a safe and timely manner when it is longer required.

Rideauwood relies on the support of generous donors. The organization aims to maintain and enhance long-term relationships with its donors.

Rideauwood recognizes that donors trust the organization to treat their personal information appropriately. Rideauwood is committed to protecting the confidentiality of donor data.

Rideauwood abides by the following principles that reflect its pledge to protect donors' personal information:

## Accountability

Rideauwood is responsible for all personal information in its possession. All employees, agents and authorized service providers of Rideauwood are required to protect the confidentiality of donors' personal information.

## **Identifying Purposes**

Rideauwood collects, uses and discloses personal information only to:

- Process and receipt donations
- Fundraise
- Provide donors with information about Rideauwood
- Respond to donor information requests
- Recognized donors publicly for their donation, with their consent

#### **Consent**

Rideauwood collects, uses and discloses donor personal information with donor permission.

Rideauwood obtains express consent when individuals provide consent orally, in writing, or through an applicable online action. Rideauwood obtains implied consent from individuals when consent may reasonably be inferred from the action or inaction of the individual.

Donors may withdraw their permission for Rideauwood to collect, use and disclose their personal information at any time, subject to legal and contractual restrictions and reasonable notice. Rideauwood will obtain donor consent before making information available to third parties outside of Rideauwood. All fundraising communications from Rideauwood will include an opt-out opportunity for the recipient of the communication.

Rideauwood may use personal information without the individual's consent under particular circumstances. These situations include, but are not limited to:

- The collection is clearly in the interests of the individual and consent cannot be obtained in a timely way;
- The collection is made for the purpose of making a disclosure required by law; or
- Any other reason as defined in applicable legislation.

#### **Limiting Collection**

Rideauwood obtains personal information about its donors lawfully and fairly. Rideauwood collects, uses and discloses personal information only for the purpose identified at the time of collection.

# **Limiting Use, Disclosure and Retention**

Rideauwood does not sell donor information to anyone or to any organization. Rideauwood will keep donor personal information only as long as it is necessary to satisfy the purposes for which it was obtained, or as required by law. When Rideauwood destroys personal information, it will

use safeguards to prevent unauthorized parties from gaining access to that information during the process.

## **Accuracy**

Rideauwood maintains appropriate procedures to ensure that the personal information of donors in its possession is accurate and up-to-date. Donors are entitled to seek a correction of their personal information if they believe the information in the organization's possession is incorrect. If donors believe any of the information Rideauwood has collected about them is incorrect or incomplete, they have the right to ask Rideauwood to change it or delete it, and Rideauwood will make the necessary changes.

## **Safeguards**

Rideauwood will protect donor personal information by safeguards that are appropriate to the sensitivity of that information. Access to a donor's personal information is restricted to Rideauwood employees and authorized individuals who need it to do their jobs. Rideauwood maintains appropriate technical and organizational safeguards to protect donor personal information against loss, theft, unauthorized access, disclosure, copying, use or modification. Rideauwood maintains appropriate safeguards and security procedures for all types of records, including electronic or paper documents, organizational measures including security clearances and limiting access on a "need-to-know" basis, and technological measures such as the use of passwords.

## **Openness**

Rideauwood makes readily available to its donors specific information about its policies and practices relating to the management of personal information.

## **Individual Access**

Donors have the right to know how Rideauwood collected their personal information and how the organization is using it. In most instances, Rideauwood will grant individuals access to their personal information in the care, custody, and control of the organization upon presentation of a written request and satisfactory identification. If the organization denies an individual's request for access to their personal information, the organization will advise in writing of the reason for such a refusal. The individual may then challenge the decision.

#### **Challenging Compliance**

Donors may register a privacy-related complaint by contacting the Rideauwood's Privacy Officer. Rideauwood's Privacy Officer will investigate all complaints. If an objection is justified, Rideauwood will take all appropriate steps to repair the situation. Personal information relating to volunteers, job applicants and employees are subject to similar protocols.

#### 5. RELATED MATERIALS

The Donor Bill of Rights