



CHED Santas Anonymous Incorporated

Operating as: 630 CHED Santas Anonymous

Policy Category & Number: Board Governance 6

Policy Name: Privacy Policy

Purpose:

630 CHED Santas Anonymous (Santas Anonymous) is committed to protecting the privacy of the personal information of its employees, volunteers, clients, supporters and other stakeholders. We value the trust of those we deal with, and of the public, and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the information that is shared with us.

During the course of our various projects and activities, Santas Anonymous frequently gathers and uses 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 is subject to consent. The Santas Anonymous' privacy practices are designed to achieve this.

Authority:

630 CHED Santas Anonymous Board shall establish the parameters and ensure that policies are adhered to on an ongoing basis.

Policy:

Defining personal information

Personal information is any information that can be used to distinguish, identify or contact a specific individual. This information can include an individual's opinions or beliefs, as well as facts about, or related to, the individual. Exceptions: business contact information and certain publicly available information, such as names, addresses and telephone numbers as published in any public telephone directories, are not considered personal information.

Information in the public domain is not subject to privacy legislation and as such is not included in this policy.

Where Santas Anonymous supporters and clients use their home contact information as business contact information, Santas Anonymous considers that the contact information provided is business contact information, and is not therefore subject to protection as personal information.

We consider client, donor, staff and volunteer information always to be personal information, and do not disclose information about donors or volunteers without consent.

Santas Anonymous observes the following practices when collecting, maintaining and using personal information:

- Consent

An individual's consent is required regarding the collection and proposed use of personal information when information is collected. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from an individual's action or inaction. An individual's consent is required before confidential information is released to outside parties.

- Cookies

Santas Anonymous' websites use persistent cookies within visiting browsers to enable the functions of the website and for tracking performance. Specifically, cookies are used the following ways:

Preserving and expiring visitor sessions on the site (e.g. preserving data between steps of a process; and ending the session after a period of inactivity)

Storing font size preferences on the site

Enabling web analytic tools (such as Google Analytics, Clicktale, and iPerceptions – see below)

Cookies are used anonymously and without storing Personally Identifiable Information (PII). Visitors that wish to opt-out of cookies should review the help documentation for their browser software to decline or selectively decline cookies. Note that declining cookies may adversely impact site performance.

- Google Analytics

Our website uses Google Analytics to track performance. Google Analytics uses persistent cookies to track visitor sessions, visitors across multiple sessions, and referral sources to our sites. We also track the performance of promotional links to our site using Google Analytics. In compliance with the Google Analytics Terms of Service, at no time is personally identifiable information (PII) passed to Google Analytics. Note that Google Analytics stores its data within the United States of America and is subject to US laws. We use this data to understand site performance to serve you better. Those wishing to opt out of Google Analytics data collection should use the Google Analytics Opt-out Browser Add-on.

- Limited Collection

The collection of personal information is limited to that which is relevant and necessary to our programs and fundraising efforts. Santas Anonymous shall not make unwarranted or intrusive inquiries into a donor or prospect's gift history or personal life.

- Limited Use, Disclosure and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

- Accuracy

Personal information shall be as complete, accurate and up-to-date as possible. Donors, staff and volunteers are encouraged to review, correct and update personal information annually.

- Security Safeguards

Personal information gathered by Santas Anonymous shall be kept in confidence. Santas Anonymous personnel shall be authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained.

Appropriate physical and electronic measures shall be used to ensure personal information is secure. Access to client, donor and volunteer records shall be limited to those who require such information to fulfil their job responsibilities. Special protection shall be given to all records pertaining to anonymous donors. The confidentiality of client, donor and volunteer records shall continue after the relationship with the individual has ended.

- Confidentiality

Donors who request that their name and/or the amount of the gift not be publicly released shall remain anonymous.

Santas Anonymous does not sell, barter or lease donor lists.

- Openness

Upon request, individuals shall be given access to the information in their donor, volunteer or employee record.

Further information on privacy and your rights in regard to your personal information may be found on the website of the Privacy Commissioner of Canada at www.priv.gc.ca.

Approval: May 26, 2020

Review: This policy will be reviewed, at minimum, two (2) years from its last review and approved date.