

By-Laws & Policies



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Title	Privacy of Personal Information	Original	April 2014
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PURPOSE

To define BUW's confidential business information and outline the requirements for all employees to protect and safeguard such information from inappropriate disclosure.

DEFINITIONS

Personal Information: Information about an identifiable individual, but excludes certain business contact information, specifically name, title, business address or telephone number of an employee of an organization. From time to time, BUW may, acting reasonably, collect information about identifiable individuals from published or public sources for the purposes of developing relationship with individuals.

POLICY

All members of Brant United Way (BUW) and employees of BUW, who are privy to any personal information with regard to any employee, donor, prospective donor, board members, volunteers, individuals who engage with BUW on community initiatives and staff must hold that information as confidential, unless otherwise requested by law.

Brant United Way will at all times strive to comply with all applicable privacy legislation including, but not limited to, PIPEDA and Canada's Anti-Spam Legislation, regardless of whether the information was obtained by, and/or subsequently used by, Brant United Way or a third party.

PROCEDURE

Accountability

- BUW is responsible for all personal information in their possession, including any personal information transferred to third parties for handling or administrative purposes.

- Individual personal information is kept in strict confidence. All employees, agents (including authorized volunteers) and authorized service providers of BUW are required to protect the confidentiality of personal information. All employees and agents are required to sign and adhere to an Oath of Confidentiality which ensures they are informed about the importance of privacy protection.
- While choosing certain services like data processing to be provided by third party all precautions are taken to ensure protection of personal information. The service providers enter into agreement with BUW that confirm they have privacy and security standards comparable to those of BUW.

Collection and Use of Personal Information

Community

- BUW works to improve social conditions, which involves working with individuals acting on their own initiative or as representatives of community agencies, governments and other partner organizations that share common social objectives. BUW gathers and uses personal information to keep individuals informed about relevant activities and work, and with permission may share personal information with others who share similar social objectives and a desire for networking.

Donations

- BUW collects and uses personal information necessary to process donations and payments, redirects a donation or any part of a donation to another charity as instructed by the donor, issues tax receipts, confirms renewal of giving and maintains a donation history, keeps donors informed about giving opportunities and the work of BUW, acknowledges and recognizes donations, and complies with federal and provincial regulatory guidelines and reporting requirements.

Workplace Campaign Participation

- BUW supports workplace organizations who wish to run internal employee giving campaigns. BUW may be provided with employee names, business contact information and other employee-related information in order to provide personalized campaign pledge tools, whether paper pledge forms or secure online links, to carry out a workplace campaign. BUW works with organizations delivering workplace campaigns to determine data needs that ensure an optimal experience for employees and which also meets the organization's personal data management policies. The data

provided to BUW is used only for the purposes of setting up the pledge tools. If the employee chooses to make a donation, BUW will retain personal information provided directly by the donor and any associated workplace employment information required to manage the donation. If the employee chooses not to make a donation or request further information, BUW does not retain any information provided by the workplace. In some situations, the workplaces run campaigns that reach beyond employees to include other related individuals such as retirees or contractors. BUW follows the same practices in working with organizations in these situations as with employees.

Volunteering

- BUW collects and uses personal information to establish and maintain the volunteer relationship, assist volunteers in performing their volunteering roles and responsibilities, and keep them informed about relevant BUW activities and the work of BUW.

Event Participation

- BUW collects and uses personal information necessary to communicate with individuals about events, contests and promotions that they participate in, issues concerning related transactions, information about other events that they may be interested in and the work of BUW; to recognize participation and award prizes; and to comply with federal and provincial regulatory guidelines and reporting requirements.

BUW Employees

- BUW collects and uses personal information to establish, maintain, administer and terminate the employment relationship including ongoing obligations regarding benefits, medical history and pension.

Consent

Individual personal information is obtained lawfully and fairly. The personal information is collected, used or disclosed with the individual's permission, except where otherwise required or permitted by law.

The individual's permission may be expressed orally, electronically or may be implied by an action or inaction. For example, if a portion of an individual's gift is designated to another charity, the pledge form provides an opportunity to direct BUW to share individual's personal information with the designated recipient charity. Otherwise, the funds are passed on to the recipient charity anonymously.

A permission to the use and disclosure of personal information can be withdrawn at any time.

Please note, BUW takes steps to suppress donation requests or general information. But a tax receipt or a statement of an outstanding payments against the individual's pledged donation will be still mailed to a donor. Due to printing and distribution schedules some communication that were in process before BUW received a donor's request may continue to be sent to the person.

Purpose of Collecting Personal Information

BUW collects, uses and discloses personal information only for certain purposes that are identified to an individual we collect the information about.

With the particular person's consent, the information is collected for various purposes, including the following:

- Establishing the person's identity.
- Administering the individual's involvement with BUW, including his/her donations, event participation, community engagement, volunteering, employment and contacting the person about his/her continued involvement.
- Knowing who the donors, volunteers and other supporters are in order to manage and develop BUW resources to fulfill our mission to serve the greater good of the community
- Sending literature on BUW, invitations to events/information sessions aligned with BUW interests and Thank You notes.
- Recognizing donors' contributions.
- Sharing information with other individuals or organizations only with the consent of the donor, including organizations to which the donors wish to redirect their donations to or volunteer at/interact with on BUW behalf.
- Generating statistics and reporting to help BUW and its partner organizations understand where the organization can have a greater impact on the community.
- Meeting legal and regulatory requirements.

Limiting Collection, Use, Disclosure and Retention of Personal Information

Personal information collected is limited to that required for the purpose identified by BUW.

- Personal information is used for the purpose identified by the individual. If it is used for a different purpose not identified to an individual when the information was collected, the new purpose will be identified to the person and the permission will be obtained prior to use.
- Personal information is never sold.
- Personal information is disclosed in the following circumstances:

- For donors giving through their workplace – the workplace has access to certain personal information in the execution of the Employee Campaign. BUW is respectful of the donor’s right to privacy and works with the individuals responsible for the Employee Campaign to limit with whom the information is shared and to only share information necessary for the purpose of the campaign. The employers may have internal policies on their access and use of employee personal information: BUW works within the requirements of that organization’s policies.
- For a donation belonging to another United Way community but administered by BUW. In that case the personal information is disclosed only to the specific United Way designated by a donor.
- For a donation designated to another charity - a name, workplace (if a donation is a part of Employee Campaign) and designation amount to the selected charity is provided with a permission of the donor. If permission is not provided, the donation is sent on an anonymous basis.
- For services performed by third parties – BUW ensures that they use security and privacy standards comparable to our own.
- For events hosted by a third party using BUW systems to register participants, the personal information may be shared with the host solely for the purposes of managing the event and the individual’s participation in the event.
- In all other situations, BUW will disclose people’s personal information only with the individual’s consent, or as otherwise required/permitted by law.
- The personal information is kept only as long as it is necessary to satisfy purposes for which it was obtained or as required/permitted by law.
- During employment with Brant United Way, or at any time thereafter, employees may not copy, use or disclose to any person any secrets or business information relating to the private or confidential affairs of Brant United Way or its affiliates, suppliers, clients or prospective clients.
- Should employees receive any inquiries from the public or other 3rd parties (i.e. media) soliciting information about Brant United Way, the inquirer will be immediately referred to the Executive Director. Any employee who divulges or fails to appropriately safeguard confidential information without prior authorization may be disciplined up to and including dismissal.

Individual Access

To access individual personal information or to see if it is accurate, an individual needs to request that in writing. BUW will need to confirm the person’s identity prior to disclosing any information and may charge a reasonable fee to cover the

cost of providing the information. If a fee is charged, BUW will inform the individual of the approximate cost prior to providing information.

The individual has a right to know how the personal information has been collected and how it has been used.

Every employee has the right to access their personal file pending a 48-hour notice. No files or any part thereof can be removed from the premises.

Confidential information within the office shall be inaccessible to non-authorized personnel as determined by the Board of Directors and/or the Executive Director. All documentation remains the property of Brant United Way.

In the case of a deceased employee, a personal representative or the executor or administrator of the employee's estate will have the right to access the employee's personal file for a specific reason. The request must be made in writing. A copy of the death certificate is required prior to access being granted. Consent for release of personal information must be given in writing by the employee.

Challenging Compliance

If anyone has any privacy concerns, they may contact any employees that they normally interact with to discuss their concerns or requests. If a person is unsure of whom to contact or have further concerns, they may contact info@brantunitedway.org and the message will be forwarded to the attention of the Executive Director.

One may also use the same email address to register a privacy-related complaint. BUW will investigate all complaints. If an objection is justified, all appropriate steps to repair the situation will be taken, including changing BUW policies and practices if necessary.

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