

GEORGE JEFFREY CHILDREN'S FOUNDATION

Privacy Policy

Principles

At George Jeffrey Children's Foundation the privacy of the personal information of our donors, prospective donors, employees, and other stakeholders has always been an important aspect of how we conduct our business. The Foundation values the trust of those with whom we deal as well with the public at large and we recognize that maintaining this trust requires that it be open and accountable in how we treat information entrusted to us. As a result, George Jeffrey Children's Foundation has developed this policy both to ensure compliance with privacy legislation as well as to inform our stakeholders of our continuing commitment to the protection of their personal information.

All Foundation personnel are authorized to access personal information in our files only as required for the conducting of legitimate and appropriate Foundation business. In addition, we have instituted safeguards to ensure that the information retrieved is not used nor disclosed beyond its immediate requirements.

This policy adheres to the federal Personal Information Protection and Electronic Documents Act (PIPEDA).

Definition

Personal information includes any factual or subjective information, recorded or not, that could be used to distinguish, identify, or contact an individual. This includes information in any form such as personal email address, credit card numbers, home addresses and so on. It does not include certain publicly available information such as that normally found on a business card, such as name, title, company, business address, business email address, business telephone or fax number. Also not deemed to be personal information is certain publicly available data such as names, addresses and telephone numbers as published in telephone directories.

Privacy Practices

1. Accountability

The Executive Director or other person so designated by the Board serves as George Jeffrey Children's Foundation's Chief Privacy Officer. All employees, volunteers, and members of the Board of George Jeffrey Children's Foundation are required to comply with this Privacy Policy. At times, George Jeffrey Children's Foundation staff may be delegated to act on behalf of the Chief Privacy Officer or to take responsibility for occasional collection, use and/or disclosure of personal information.

2. Declaration of Privacy Responsibilities

During their orientation to their various responsibilities to George Jeffrey Children's Foundation, all individuals who have or may have access to the Foundation's confidential files are required to sign a Policy on Confidentiality confirming their understanding of this policy and their commitment to its adherence.

GEORGE JEFFREY CHILDREN'S FOUNDATION

3. Identifying Purposes

Before, or at the time of the collection of personal data, George Jeffrey Children's Foundation must identify the purposes for which personal information is being collected. Information collected will be used only for the original purpose for which it was collected, unless required otherwise by law.

3.1. George Jeffrey Children's Foundation collects personal information for the following purposes:

- a) To establish and maintain a responsible relationship with donors;
- b) To register participants at events in support of George Jeffrey Children's Foundation;
- c) For purposes identified to individuals or purposes obvious to individuals, in respect of particular collections of personal information;
- d) To meet legal and regulatory requirements;
- e) To share information about George Jeffrey Children's Foundation, including but not limited to the Annual Report, event invitations, newsletters, and updates concerning George Jeffrey Children's Foundation and its needs;
- f) To manage and develop George Jeffrey Children's Foundation's operations.

4. Consent

In the collection, use or disclosure of personal information, knowledge and consent of the individual so involved is required. This consent must be meaningful and easily understood. Nonetheless, in certain circumstances, such as an emergency or as required by law, George Jeffrey Children's Foundation may disclose personal information without the interested individual's knowledge or consent.

5. Publication of Donor Lists

With respect to the publication of donor lists by gift category, donor requests for anonymity will be honoured.

6. George Jeffrey Children's Centre Client and Volunteer Solicitation

George Jeffrey Children's Foundation receives contact information of volunteers and clients and their families from George Jeffrey Children's Centre. Formal requests from individuals to be excluded from mailings or other communications will be respected and acted on promptly.

7. Limiting Collection

Personal information collected is limited to the purpose for which it was collected, except with the consent of the individual and as permitted by law. Should there be an additional use for which the information may be employed, individuals affected must be notified and their concurrence formally secured.

8. Limiting Use, Disclosure and Retention

Personal information will be used only for the purpose for which it was collected except with the consent of the individual or as required by law.

GEORGE JEFFREY CHILDREN'S FOUNDATION

9. Accuracy

The Foundation shall take steps to ensure that personal information is accurate, complete, and as up-to-date as possible. If individuals are aware of changes to personal information that they have given to the Foundation, they can inform the Foundation of the changes and the Foundation will update its records.

10. Safeguards

The Foundation shall protect personal information by security safeguards appropriate to the sensitivity of the information and the means by which is it stored.

10.1 The Foundation shall establish appropriate safeguards to protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use modification or destruction. Employees and volunteers of the Foundation shall be made aware of the importance of maintaining the confidentiality of personal information.

10.2 The Foundation shall establish appropriate safeguards to protect personal information disclosed to third parties, for example by contractual agreements stipulating the confidentiality of the information and the purposes for which such information is to be used.

10.3 The Foundation shall not lend exchange, rent, or sell its donor information to other organizations or individuals.

11. Openness

Copies of the Foundation's Privacy Policy shall be made available upon request and shall be available on its website.

12. Individual Access

Upon request, an individual will be given access to his or her personal information stored by the Foundation. An individual has the right to challenge the accuracy and completeness of the information and have such information amended if appropriate.