



MANUAL: Policies	NUMBER: 2009-01
SUBJECT: Privacy Statement	PAGE: 1
ISSUED BY: Governance	APPROVED: January 20, 2009, July 25, 2018 (Board)
REFERENCES (if applicable):	REVISED: July 12, 2017 (Governance)
	REVIEWED: July 12, 2017 (Governance)

Our Commitment to Privacy

Community Foundation Grey Bruce is committed to protecting the privacy of the personal information of our Fundholders, donors, prospective donors, board members, staff, volunteers and other stakeholders and has adopted privacy practices consistent the National Standard of Canada Model Code for the Protection of Personal Information (see APPENDIX 1), which forms the basis of federal and provincial privacy legislation for this purpose.

What is personal information?

“Personal information” means 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.

Why do we need to collect personal information about you?

Community Foundation Grey Bruce collects, uses and discloses personal information from our Fundholders to identify and help them meet their philanthropic needs, process their donations, provide tax receipts, direct their gifts in the manner in which they choose, keep them informed about gift giving opportunities and Community Foundation activities, recognize their philanthropic activities in the community, and comply with federal and provincial legal and regulatory guidelines and reporting requirements.

Where donors make gifts to a Fundholder’s Donor Advised Fund, unless donor anonymity is requested, Community Foundation Grey Bruce discloses donation-related information to the Fund’s designated representative(s) (“Fund Representative”) to enable the Fundholder to steward gifts and thank donors appropriately. All donors have the right to request anonymity and can do so prior to confirming their donation online, or by noting their request for anonymity when mailing or delivering a donation to the office.



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The personal information disclosed to the Fund Representative, unless anonymity is requested, includes the donor's name, mailing and/or email address and the donation amount. Prior to receiving donor personal information, the Fund Representative must agree in writing that personal information received will be used solely for the purpose of acknowledging donors and stewarding donations, and that it will not be shared or used for any other purpose.

Community Foundation Grey Bruce collects, uses and discloses personal information from our board members and other volunteers to keep them informed about our activities, assist them in performing their roles in the organization, and comply with federal and provincial guidelines and reporting requirements.

Community Foundation Grey Bruce collects, uses and discloses personal information from our employees to assist in administering employee benefit programs, accommodate disabled individuals in the workplace, assist employees with illnesses or injuries in returning to work, support their ongoing training and development, and comply with federal and provincial guidelines and reporting requirements.

How do we obtain your consent?

We obtain your consent for collecting, using and disclosing personal information for the identified purposes before such information is collected for the first time. We also seek the consent of our Fundholders to disclose their name and the name of their personal/family fund in Community Foundation Grey Bruce publications and reports. Once this consent has been obtained, we do not seek consent again, unless the purpose, use or disclosure of your personal information changes.

How do we control and protect your personal information?

We only collect and use personal information that is necessary for the intended purpose. We keep your information for only as long as necessary and maintain its confidentiality when it is destroyed. We make sure that your personal information is kept accurate, complete and up-to-date for our purposes. We protect your information from unauthorized access or use through physical and electronic security safeguards and limit access to only authorized persons and only when necessary. All of our board



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members, staff, volunteers and the other people working at the Foundation sign confidentiality agreements that require the safeguarding and proper use of your personal information.

How can you be sure that your personal information is being properly collected, used and protected?

You can ask us about our privacy practices at any time. Upon written request and with reasonable notice, you can access your own personal information, challenge its completeness and accuracy and seek to have it amended.

You can also challenge our privacy policies and practices with Community Foundation Grey Bruce's Executive Director and Privacy Officer who will acknowledge receipt of your correspondence and will reply to you in writing within two weeks, and may take appropriate action, including amending your information or changing our privacy practices. The name and contact information for Community Foundation Grey Bruce's Executive Director and Privacy Officer can be obtained by calling us at (519) 371-7203.

If our Privacy Officer does not resolve your complaint or address your questions to your satisfaction, you can seek more information or file a complaint with the Privacy Commissioner of Canada:

Office of the Privacy Commissioner of Canada
112 Kent Street
Place de Ville, Tower B, 3rd Floor
Ottawa ON K1A 1H3



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APPENDIX 1

These 10 principles form the basis of the Model Code for the Protection of Personal Information (CAN/CSA-Q830-96; published March 1996; reaffirmed 2001).

1. Accountability

An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.

2. Identifying Purposes

The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.

3. Consent

The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except when inappropriate.

4. Limiting Collection

The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.

5. Limiting 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 fulfilment of those purposes.



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6. Accuracy

Personal information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

7. Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

8. Openness

An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

9. Individual Access

Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

10. Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.

Note: The full text of the Model Code for the Protection of Personal Information can be obtained from the Canadian Standards Association's online store.

You may also order the Model Code from:

CSA International

178 Rexdale Boulevard, Etobicoke ON M9W 1R3

1 800 463-6727 (in Canada), (416) 747-4044