



## **Privacy Policy For Donors, Potential Donors, Volunteers and Employees of the Jewish Community Foundation of Calgary**

### ***Preamble***

JCFC recognizes the value of its relationships with potential donors, donors, volunteers, and employees, and is committed to respecting and safeguarding their personal information. We value the trust of those we deal with and of the public, and recognize that maintaining this trust requires transparency and accountability in our treatment of the personal information that is entrusted to us.

We manage your personal information in accordance with Alberta's Personal Information Protection Act and other applicable laws. Our privacy policy adheres to the 10 principles that comprise the Canadian Standards Association Model Privacy Code, which forms the basis for Canadian privacy legislation.

This policy statement outlines the principles and practices we follow in protecting your personal information.

### ***Definition of Personal Information***

Personal information means information about an identifiable individual. This includes an individual's name, home address and phone number, age, sex, marital or family status, an identifying number, financial information, contracts between the JCFC and donors, educational history, etc. Personal information does not include publicly available information.

### **Principle 1 – Accountability**

An organization is responsible for personal information under its control.

1.1 We are responsible for personal information in our possession, including information that has been transferred to a third party for processing. In cases where such transfers take place we make every effort to ensure that the third party has comparable privacy safeguards in place.

### **Principle 2 – Identifying Purposes**

The purposes for which personal information is collected shall be identified by JCFC when or before the information is collected.

2.1 We collect only the personal information that we need for the purposes of providing services to our clients, including personal information needed to:

- deliver requested products and services
- create contracts
- send out membership information
- to comply with CCRA requirements for gift processing;
- to provide donors with information about how donated funds are used by JCFC;
- to keep them informed about JCFC's activities;
- to promote opportunities for donors and potential donors to support JCFC;
- to determine the donor's motivation in creating a fund and to assist JCFC in making decisions about distributions from the fund; and
- to advise fund holders of donations made to their funds

During the course of its various projects, programs and activities, the JCFC may also collect personal information from Board members, other volunteers and employees.

The JCFC will endeavor to specify the identified purposes, orally or in writing, to the individual from whom personal information is being collected either at the time of collection or after collection but prior to use or disclosure. We will state the identified purposes in such a manner that an individual can reasonably understand how the information will be used or disclosed.

We normally collect client personal information directly from our clients. We may collect your information from other persons with your consent or as authorized by law. The purposes will be limited to those which are related to the JCFC's projects, programs and activities and which a reasonable person would consider to be appropriate in the circumstances.

### **Principle 3 – Consent**

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

3.1 We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain personal information. Where express consent is needed, we will normally ask clients to provide their consent orally (in person, by telephone), or in writing (by signing a consent form).

The manner in which JCFC obtains consent for the collection of personal information varies with the sensitivity of the information being collected. Alberta's Personal Information Privacy Act (PIPA) makes provision for express, implied or deemed consent, depending on the situation. Because of the nature of the information we collect, in most cases we will rely on implied consent at the time of collection.

The principle requires "knowledge and consent," and JCFC will make a reasonable effort to ensure that individuals are aware of the purposes for which personal information is collected at or before the time of collection. Individuals can give consent:

- in writing, such as when completing an online donation form or signing a Deed of Gift;
- orally, by contacting the JCFC directly; either in person or by telephone.

3.2 Individuals may withdraw their consent at any time, by any means, with reasonable notice to the JCFC, unless the personal information is necessary for us to fulfill our legal obligations. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary personal information. Consent cannot be withdrawn retroactively.

3.3 JCFC may collect, use, and disclose personal information without consent if that information is considered by law to be in the public domain. Sources of public information include telephone and professional directories, newspapers, periodicals and public registries.

#### **Principle 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.

4.1 JCFC will not collect information indiscriminately. The types of information collected are limited to that which is necessary and reasonable to fulfill the purposes identified in 2.1. The JCFC will collect personal information by lawful means and will not intentionally mislead individuals about the purposes for which information is being collected.

Some of the types and means by which personal information is collected by JCFC may include:

(a) Information Collected Automatically from JCFC Website such as the Internet Protocol Address and domain name used. The Internet Protocol address is a numerical identifier assigned either to the donor's Internet service provider or directly to the donor's computer.

(b) Information Collected Directly From an Individual: The JCFC will collect and record personal information provided to us by an individual through correspondence, conversations, meetings, conferences, donations, or other forms of communication.

(c) Information Collected from Public Sources.

These types and means by which personal information collected is collected by the JCFC are not intended to be an exhaustive list, and the JCFC may collect personal information about an individual from time to time by other means as is consistent with the purposes identified in 2.1.

### **Principle 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 fulfillment of those purposes.

5.1 When JCFC uses personal information for purposes other than those given at the time of collection, consent will be obtained for those specific purposes.

5.2 JCFC does not sell, rent, or trade mailing lists.

5.3 JCFC will not disclose an individual's identity or personal information to third parties except in accordance with the terms of its privacy policies or unless required to do so as a part of an internal investigation or other law enforcement purpose, or as required by law.

5.4 Personal information will be retained as long as the purpose for which the information was originally collected remains valid.

### **Principle 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.

6.1 JCFC will use its best efforts to ensure that information is used on an ongoing basis, including information that is disclosed to third parties, and information that is used to make a decision about an individual (such as a giving recognition category) is accurate, complete and up-to-date.

### **Principle 7 – Safeguards**

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

7.1 We make every reasonable effort to ensure that personal information is accurate and complete. We rely on individuals to notify us if there is a change to their personal information that may affect their relationship with our organization. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible. In some cases we may ask for a written request for correction.

The JCFC will protect personal information in a manner appropriate for the sensitivity of the

information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access, collection, use, disclosure or disposal. Security measures have been integrated into the day-to-day operating practices of the JCFC.

7.2 We will make our employees aware of the importance of maintaining the confidentiality of personal information, and we will exercise care in the disposal and destruction of personal information to prevent unauthorized parties from gaining access to it. All employees and volunteers having access to personal information are required to sign an oath of confidentiality.

7.3 Our methods of protection will include physical measures (e.g. locked filing cabinets, restricted access to offices), organizational measures (e.g. security clearances and limiting access on a 'need-to-know' basis) and technological measures (e.g. the use of security passwords and encryption). We use appropriate security measures when destroying personal information, including shredding paper records and permanently deleting electronic records.

7.4 Third parties are expected to safeguard personal information entrusted to them in a manner consistent with the policies of JCFC, and are required to sign a confidentiality agreement as part of all contracts. Examples of third parties include mailing services and data analysis providers.

## **Principle 8 – Openness**

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

8.1 JCFC will be open about its privacy policies and procedures with respect to the management of personal information and will make them readily available in a form that is generally understandable.

## **Principle 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.

9.1 JCFC will respond to an individual's request within a reasonable length of time. While our response will typically be provided at no cost to the individual, depending on the nature and amount of information involved, we reserve the right to impose a reasonable fee to defray our cost.

9.2 The requested information will be made available in a form that is generally understandable. For example, where JCFC uses abbreviations or codes to record information, an explanation of those codes will be provided.

9.3 For the JCFC to provide an account of the existence, use and disclosure of personal information, an individual may be asked to provide additional information to aid in the search. The additional information provided will only be used for this purpose.

9.4 Upon request, JCFC will provide specific information about third parties to whom personal information has been disclosed unless prevented from doing so by the terms of any applicable confidentiality or non—disclosure agreements.

9.5 When an individual successfully demonstrates the inaccuracy or incompleteness of personal information in the possession or under the control of the JCFC, the JCFC will amend the information as required. Where appropriate, the amended information will be transmitted to third parties having access to the information in question.

9.6 Individuals may review the personal information the JCFC has recorded for that individual, and only that individual. An individual may also provide written permission to the JCFC to permit another individual to review the personal information the Foundation has recorded for that individual, but only for that individual.

#### **Principle 10 – Challenging Compliance**

An individual shall be able to address a challenge concerning compliance with the above principles to an individual accountable for the organization’s compliance. The Foundation’s manager will be the first point of contact for issues involving the privacy policy.

10.1 The complaint procedures will be easily accessible and user friendly.

10.2 Individuals who make inquiries or lodge complaints will be given information by JCFC of the existence of relevant complaint procedures.

10.3 If a complaint is found to be justified, the JCFC will take appropriate measures, including revision of the personal information, and, if necessary, amendment of JCFC’s policies and practices.

#### ***Policy Review***

This policy will be reviewed every 3 years, or as required in order to ensure compliance with changes in law.

#### **The Current Privacy Policy Reflects the Following Approvals and Amendments:**

**Privacy Policy Approved by the JCFC Board January 23<sup>rd</sup>, 2015**

**Approved without amendment by the JCFC Board May 27<sup>th</sup>, 2020**