



Canadian Hemophilia Society
Help Stop the Bleeding

DONOR PRIVACY OF PERSONAL INFORMATION POLICY

PREAMBLE

CHS understands and values the importance of privacy and is committed to maintaining the accuracy, confidentiality and security of personal information belonging to its donors, volunteers, employees, members and other stakeholders.

Furthermore, CHS values the trust of the public and those we deal with and recognizes that maintaining this trust requires that we be transparent and accountable in how we treat information that individuals chose to share with us.

This privacy policy describes the personal information that the CHS collects and discusses how we manage that information and the circumstances under which we may disclose that information. The CHS privacy policy is based upon the *Ethical Fundraising and Financial Accountability Code* of Imagine Canada (formerly the Canadian Centre for Philanthropy), as well as the requirements of applicable privacy legislation.

CHS POLICY

CHS will comply with all privacy legislation in place for the jurisdictions in which we operate.

WHAT IS PERSONAL INFORMATION?

Personal information is any information that can be used to distinguish, identify or contact a specific individual. This information can include opinions, beliefs or facts about or related to, the individual. Exceptions are business contact information and certain publicly available information such as business title or business contact information - names, addresses and telephone numbers, or any information that is publicly available, such as a telephone book listing, are not considered personal information. Where an individual uses his or her home information as business contact information, it may be considered that the contact information is business contact information and not subject to protection.

WHAT INFORMATION DOES THE CHS COLLECT?

Personally identifying information – The CHS only collects personally identifying information about donors, volunteers, members, event participants for: fundraising, public education and advocacy purposes, program and service delivery, as well as to establish, maintain and manage our relationship with a person.

The information the CHS collects is the minimum amount we need to demonstrate and maintain a service, volunteer, participant, donor or program relationship with an individual. This includes:

- Contact and identification information, such as a person's name, address, telephone number and e-mail address.
- Donation information such as date of gift, amount of gift, the campaign or event a person contributed to, name of spouse or partner if it was a joint gift.
- Financial information such as a person's payment methods and preferences, billing and banking information (credit card number and expiry date or chequing account transit numbers in order to process the person's donation); for online financial transactions such as donations and event registrations, we process standard credit card information (card number, card type and expiration date) via a secure, encrypted secure gateway which is PCI compliant.
- Other personal information used for purposes that a reasonable person would consider appropriate in the circumstances (for example: a person has demonstrated an interest in participating in one of our fundraising events) we may send them information regarding other fundraising programs.
- Some of the information the CHS collects is needed in order to satisfy the requirements of the Canada Revenue Agency (CRA) – income tax receipts as an example.

There are also circumstances where the use and/or disclosure of personal information is justified or permitted without consent. These circumstances may include:

- Where required by law or by order or requirement of a court, administrative agency or other governmental tribunal.
- Where the information is public.
- Where the CHS believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety or property of an identifiable person or group.

WHY DOES THE CHS COLLECT PERSONAL INFORMATION?

As explained above, the CHS uses the personal information it collects for fundraising, to process donations, to respond to requests for services and information and to keep a person informed about CHS initiatives and programs. We also collect personal information for internal research purposes; to develop appropriate programs and services or to develop activities and advertising based upon donor preferences.

WHEN DOES THE CHS DISCLOSE PERSONAL INFORMATION?

The CHS shares personal information only with employees and/or volunteers who require such information to establish, manage and maintain our relationship with a person. We may also disclose personal information to third party service providers whom we engage to mail our fundraising material.

These third party providers only have access to personal information that is needed to perform the related function and may not use it for any other purpose. When information is transferred to third parties for processing, such as a mail house, safeguards are put in place to prevent disclosure or unauthorized uses. The CHS does not exchange the names of our donors with other like-minded charities, and we never sell our donor lists. If any individual does not want to receive any marketing or fundraising materials from the CHS or does not wish to be contacted by us, they can call or write to us and we will honour their requests. We ensure we include an “opt out” clause as a matter of routine periodically in our mailings, providing our donors with ongoing opportunities to share their wishes with us.

ACCURACY AND MAINTENANCE OF INFORMATION

The CHS aims to ensure that any personal information it collects is accurate, complete and current as required for the purposes for which the information is used.

All personal information gathered by the CHS will be kept in confidence, in a secure manner.

If any information about donors is to be used for any purpose other than what it was collected for, it cannot be done without consent from the donor.

The CHS keeps personal information only as long as it is required for the reasons it was collected. The length of time we will retain the information varies, depending on the program, service, or event and nature of the information. For example; we generally keep financial information for seven years, in accordance with CRA rules and regulations. The retention period may extend beyond a person’s relationship with the CHS. When the personal information is no longer required for CHS purposes, it is either physically destroyed or deleted.