



# Privacy Policy

The Ottawa Community Foundation ("the Foundation") is committed to protecting the privacy of the personal information of its donors, employees, volunteers, and all stakeholders. We value the trust of our stakeholders and recognize that maintaining this trust requires discipline, transparency, and accountability.

The Foundation may collect information through various means, including but not exclusively our website, email, telephone, and in-person correspondence. To ensure the balance between an individual's right to protect their personal information and our need to collect, use or disclose personal information for reasonable organizational operations, the Foundation follows the guiding principles in Canada's Personal Information Protection and Electronic Documents Act (PIPEDA).

This Privacy Policy explains how the Foundation collects, uses, and discloses personal information in alignment with PIPEDA's Fair Information Principles.

## Application

This Policy applies to the Foundation's Board of Directors, employees, volunteers, and third-party service providers that require access to personal information to carry out their work.

## Discipline

The Foundation aligns its privacy practices with the **Fair Information Principles** outlined in PIPEDA.

## Accountability

The Foundation is responsible for personal information under its control, including personal information shared with a third party. Third parties must safeguard information entrusted to them in a manner consistent with this Policy. The Foundation has appointed a designated Privacy Officer to support the compliance of privacy practices outlined in this Policy (see Pg 3).

## Purposes

The Foundation identifies the purposes for which personal information is being collected before or at the time of collection. The purposes will primarily be limited to those related to the Foundation's programs and activities. In the course of our work, we may collect information to:

- comply with CRA requirements to process donations
- inform stakeholders of the Foundation's activities
- promote opportunities to support the Foundation

## Consent

The Foundation obtains meaningful consent for the personal information it collects.



The Foundation will strive for Express Consent, which occurs when someone has agreed verbally or in writing.

The Foundation, in some cases, may rely on Implied Consent in limited circumstances. Implied Consent occurs when there is an existing business or non-business relationship but is only valid for two years following the last interaction. For example, an instance in which a person has donated to the Foundation satisfies implied consent. A person may withdraw consent of any kind by contacting the Foundation.

## **Collection**

The Foundation limits the collection of personal information to the minimum required for the purposes identified by the organization.

## **Use, Disclosure, and Retention**

The Foundation will use personal information only for the identified purposes for which it was collected. The Foundation may request consent for new purposes other than those given at the time of collection.

Personal information will not be rented or sold to any third party. The Foundation will only disclose information to third parties when there is an agreement that outlines the third party's adherence to the terms of this Policy. The Foundation will retain Personal information for as long as the identified purpose for which the Foundation originally collected remains or as required by law.

## **Accuracy**

The Foundation strives to ensure personal information held is accurate and up to date. Individuals who wish to request corrections to personal information may notify the Foundation in writing.

## **Protection**

The Foundation protects the personal information of individuals by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure, or disposal. Security measures have been integrated into day-to-day practices through coordination with the Foundation's IT Services Provider and regular engagement with staff. Access to documents on the central server is segregated, with access granted only when necessary.

## **Openness**

The Foundation will make this Policy and its privacy procedures readily available. The Foundation will strive to ensure the Policy is straightforward with minimal ambiguity.

## **Access to Information**

Anyone may request confirmation of the existence, use and disclosure of their personal information and shall be given access to that information. The Foundation encourages individuals to request corrections and updates to their information to ensure accuracy and completeness.

The Foundation's designated Privacy Officer is available to address questions or complaints and inquiries related to this Policy or an individual's personal information. For valid complaints, the Foundation will take appropriate measures to rectify the situation to conform to the practices laid out in this Policy.

### **Contact the Privacy Officer**

**Address inquiries, complaints, or access requests to:**

Privacy Officer, Ottawa Community Foundation

301-75 Albert Street, Ottawa ON K1P 5E7

Email: [blam@ocf-fco.ca](mailto:blam@ocf-fco.ca)

# Annex: Questions on Privacy and this Policy

## What is Personal Information?

Personal information is any information about an identifiable individual. Types of personal information collected and held by the Foundation may include an individual's name, address, email address, telephone number, and financial information.

## Why does the Foundation need to collect personal information?

The Foundation collects, uses and discloses personal information from stakeholders for various purposes including to:

- respond to questions, comments, requests, or complaints that you submit to the Foundation
- process your donations
- provide income tax receipts, where applicable
- process grant applications
- invest and administer Foundation funds
- process your registration for certain events
- to provide you with the electronic communications you request
- to track communications with you
- to improve your experience of our websites
- to analyze use of our websites
- to report to the public the names of all the Foundation's funds where donors have not requested anonymity
- to fulfill a purpose that we disclose to you when we request your personal information; and
- to meet legal and regulatory requirements.

## A note on donations to our Funds

When donors donate to a Fund at the Foundation, unless donor anonymity is requested, the Foundation discloses donation-related information to the Fundholder to enable the Fundholder to steward gifts and thank donors appropriately. All donors have the right to request anonymity and can do so before confirming their donation online or noting their request for anonymity when mailing or delivering a donation to the office.

Fundholders agree that personal information received will be used solely to acknowledge donors and steward donations and that it will not be shared or used for any other purpose.

## What types of personal information does the Foundation collect?

Examples of information collected:

- To compile valuable data on the performance of our website and other electronic communications, we may collect non-identifying information related to IP Addresses, browsers, and operations systems.
- Information such as an individual's email address, name, or telephone number may be collected through various means, including correspondence, meetings, donations, or surveys.

- Information from public sources (e.g., telephone directories, public registers) may be collected unless the individual has explicitly noted their desire not to have their data collected.

### **How does the Foundation obtain consent?**

Depending on the situation and the sensitivity of the information, the Foundation obtains consent in different ways. It may be expressed in writing or provided to us verbally or electronically.

Examples of consent:

- Electronic: An individual signs up to receive regular updates through the Foundation's website form
- Verbal: An individual agrees to disclose personal information to a representative of the Foundation. The purposes of this collection should be identified at the time of collection.
- Written: An individual may sign an agreement that acknowledges the collection, use and processing of their personal information for identified purposes.

### **How does the Foundation ensure that it properly collects, uses, and protects personal information?**

You can ask us about the Foundation's 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 Foundation's Privacy Officer who will respond to you in writing, and may take appropriate action, including amending your information or changing our privacy practices. See contact information on Page 3 of this Policy.