

# Our Privacy Policy: A Commitment to Our Donors

## Our Commitment to Protecting Donors' Privacy

United Way of Calgary and Area is committed to protecting the privacy of its donors, volunteers, employees and other individuals. We value the trust of those we deal with and of the public and we recognize that maintaining this trust requires us to be transparent and accountable in maintaining the confidentiality of the personal information donors share with us.

United Way of Calgary and Area embraces the principles of the Canadian Standards Association Model Code for the Protection of Personal Information. We are committed to ensuring that all personal information is properly collected, used only for the purposes for which it is collected, and is disposed of in a safe and timely manner when no longer required.

United Way of Calgary and Area builds stronger communities by providing people a network of care when and where they need it. Through building partnerships and investing in proven strategies, United Way addresses immediate needs and finds long-term solutions to pressing social issues. As a non profit organization, we rely on the support of generous contributors, and achieve our fundraising objectives by engaging and understanding donors. We recognize that we deal with individuals and information about individuals and that it is essential that we protect the privacy of that information.

The Federal Personal Information Protection and Electronic Documents Act (PIPEDA) and the Province of Alberta's Personal Information Protection Act (PIPA) do not apply to most United Way activities; however United Way strives to embrace best practices. Therefore United Way is committed to follow the principles of the CSA Model Code for the Protection of Personal Information upon which PIPEDA/PIPA are based.

## Definitions

**Personal Information** – information that is recorded in any form, both fact and opinion and that can be used to distinguish, identify or contact a specific individual. It does not include business contact information and certain publicly available information such as names, addresses, and telephone numbers as published in telephone directories.

**Donor** – any individual or organization that contributes funds to United Way of Calgary and Area.

**Employee** – both paid and volunteer workers for United Way.

## The Privacy Principles

An important aspect of fund raising is cultivating strong donor relationships and knowing the donors. Personal information is precious and we recognize that our donors trust us to treat their personal information appropriately. We are committed to protecting donor confidentiality. The following principles reflect our pledge to safeguard donors' personal information:

### 1. We are accountable for donors' personal information

We are responsible for all personal information in our possession. While senior management is ultimately accountable for the protection of personal information, United Way has appointed a designated privacy officer to monitor practices and procedures to ensure compliance with the principles set out in this policy.

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We take every precaution to ensure the confidentiality of donors' personal information. The data that an individual or an employer provides is used to assist in our campaign, process and receipt donations, and respond to requests for information. All employees, agents and authorized service providers of United Way of Calgary and Area are required to protect the confidentiality of each individual donor's personal information.

Where we choose to have certain services, such as data processing, delivered by third party providers, we select the service providers very carefully. We take all reasonable precautions to ensure that the service provider protects personal information. These service providers enter into confidentiality agreements and do not keep any personal information on file.

## **2. We collect, use and disclose personal information only for certain purposes that we identify to donors**

We collect, use or disclose personal information concerning our donors solely for the following purposes:

- Establish a relationship and to communicate
- Understand donors' identity and identify how we may improve our services to meet donors' preferences and expectations
- Reach our fundraising goals
- Process and receipt donations
- Provide donors with information about United Way
- Respond to donors' requests for information
- With donor's consent, publicly recognize individual donations
- Share donor information with another charity at the donor's request

We collect, use and disclose personal information concerning our employees and/or volunteers to:

- Recruit, train, recognize and retain highly qualified and motivated individuals
- Establish and maintain harmonious employer-employee relations
- Administer United Way policies and procedures
- Manage and promote the philanthropic activities of United Way
- Administer compensation and benefits

We obtain personal information about donors lawfully and fairly.

Personal information collected will be limited to that required for the purposes identified by us.

United Way of Calgary and Area hosts a variety of special events designed to build public awareness and raise additional dollars. Some of these events require the gathering of personal information. We will inform donors of the purpose for which the information is being requested. We use this information only for the purposes related to this event and destroy it as soon as it is no longer required.

## **3. We will obtain donors' consent**

We collect, use and disclose personal information only with donor permission.

The way we seek consent may vary depending on the sensitivity of the information and the reasonable expectations of the individual. Donor permission may be expressed in writing or it may be implied and may be given to us verbally or electronically.

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A donor may withdraw their permission to collect, use and disclose their personal information at any time, subject to legal and contractual restrictions and reasonable notice. We will obtain individual donor consent before making information available to third parties.

Examples:

- Designations – when a portion of a donor’s gift is directed to another charity, we will not provide the amount of the donation, the donor’s name and the name of their employer to the recipient unless specifically requested by the donor.
- Leadership Donors – leadership donors may be publicly recognized by United Way. Donors who prefer to remain anonymous should indicate this when making their pledge.

#### **4. We keep donors’ personal information accurate and up-to-date**

We maintain appropriate procedures to ensure that personal information in our possession is accurate and up-to-date. Donors are entitled to seek a correction of their personal information if they believe that the information in our possession is not correct.

If a donor believes any of the information we have collected about them is incorrect or incomplete, the donor has the right to ask us to change it or delete it.

If a donor’s personal information is inaccurate or incomplete, we will make the necessary changes.

#### **5. We do not sell donors’ personal information**

We do not sell personal information to other organizations or individuals.

We never share personal information with other non-profit organizations, without a donor’s express consent for us to do so.

#### **6. We will limit how long we keep information**

We will keep donors’ personal information only as long as it is necessary to satisfy the purposes for which it was obtained, or as required by law.

Personal information which has been used to make a decision about an individual will be retained long enough to allow the individual access to the information after the decision has been made. In the event of an access request or challenge, it will be held long enough to exhaust any recourse the individual may have under the law.

When we destroy personal information, we will use safeguards to prevent unauthorized parties from gaining access to that information during the process.

#### **7. We safeguard donors’ personal information**

United Way of Calgary and Area will protect donors’ personal information by safeguards that are appropriate to the sensitivity of that information.

Access to donors’ personal information is restricted to United Way of Calgary and Area employees, volunteers, agents and authorized service providers who need it to do their jobs.

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We maintain appropriate technical and organizational safeguards to protect donors' personal information against loss, theft, unauthorized access, disclosure, copying, use or modification.

We have developed security procedures to safeguard and protect personal information against loss, theft, unauthorized use or modification. We will maintain appropriate safeguards and security procedures that reflect the types of documents, including electronic or paper records, organizational measures including security clearances and limiting access on a "need-to-know" basis, and technological measures such as the use of passwords and encryption.

The nature of the Internet is such that it passively and automatically collects certain information about user's traffic patterns linked to their Internet Protocol (IP) addresses. These are unique Internet "addresses" assigned to all web users by their Internet Service Providers (ISP). IP addresses are automatically logged by web servers. While the IP address does not identify an individual, it may, with the cooperation of the ISP, be used to locate and identify an individual using the web.

*Server logs:* Our servers automatically log information about visits to our web site in the normal course of establishing and maintaining web connections. Server logs record statistical information, such as visitors' IP addresses, type of operating systems, time and duration of visit, web pages requested, and identify categories of visitors by items such as domains and browser types. These statistics are reported in aggregate form to us and are used to improve our web site and ensure that it provides the optimal web experience for visitors.

We do not link server log information to any other data, in a way that would enable us to identify individual visitors. However, we may review server logs for security purposes, for example, to detect intrusions into our network. The possibility therefore exists that server log data, which contains visitors' IP addresses, could in instances of criminal malfeasance be used to trace and identify individuals. In such instances, raw data logs would be shared with appropriate investigative bodies authorized to investigate such breaches of security.

*Cookies:* As with many other web sites, our site makes use of session and permanent "cookie" technology. Cookies are small text files that contain a unique identification number that is automatically deposited on a visitor's computer. This information helps us determine, in the aggregate, the total number of visitors to the site on an ongoing basis and the types of Internet browsers (e.g. Netscape Navigator or Internet Explorer) and operating systems (e.g. Windows or Macintosh) used by our visitors. This information is used to facilitate and enhance your online visits. We do not cross-reference the information automatically collected through "cookies" with any type of personal information that is voluntarily offered on or through this web site.

The use of cookie technology is common on the Internet, and many Internet browsers are initially configured to accept cookies automatically. If you would prefer not to accept cookies, you can set your Internet browser to notify you when your computer is receiving a cookie or to refuse cookies automatically. To re-adjust your Internet browser's cookie options, please refer to the instruction documentation of your particular browser, or seek online assistance.

*Spam:* We are concerned about controlling unsolicited commercial email. We will not sell, lease or rent any address lists to any third parties. While we continue to actively review and implement new technology, such as expanded filtering features, there is no currently available technology that will totally prevent the send and receiving of unsolicited email.

# Our Privacy Policy: A Commitment to Our Donors

**UnitedWay@work**, our online campaign tool, uses a secure server to allow donors to make donations or access their account information. The server encrypts personal information. For credit card transactions, United Way of Calgary and Area uses an industry-standard secure service. More details about this program are found on the actual system.

## **8. We will be open about our privacy practices**

In response to an inquiry, United Way of Calgary and Area will make readily available specific information about our policies and practices relating to the management of personal information.

## **9. We allow donors to access their personal information**

Donors may ask whether we hold any personal information about them. Donors may ask to see that information as provided by law and to ensure that it is accurate.

Donors also have the right to know:

- How we collect personal information
- How we use personal information

Upon written request, we will inform a donor of the existence, use and disclosure of their personal information and we will provide access to that personal information. We will respond to donor requests within a reasonable time (generally within 30 days). We will assist in preparing a request. We may require a donor to provide sufficient information to permit us to provide an account.

While our response will typically be provided at no cost, depending on the nature of the request and the amount of information involved, we reserve the right to impose a cost. In this circumstance, we will inform the individual of the approximate cost to provide the response and request direction as to whether to proceed.

In certain situations, we may not be able to provide access to all the personal information we hold about an individual. Exceptions will be limited and specific as permitted or required by law. Where permitted, the reasons for denying access will be provided to the individual upon request.

## **10. Donors may register a complaint**

Donors may register a privacy-related complaint by contacting United Way of Calgary and Area's Privacy Officer. We will explain our procedure and provide information about other complaint procedures available. We will investigate all complaints. If an objection is justified, we will take all appropriate steps to repair the situation, including changing our policies and practices if necessary. Personal information relating to volunteers, job applicants and employees are subject to similar protocols.

## **For More Information**

For more information, please contact United Way's Privacy Officer at (403) 231-6265 or by email at [privacy@calgaryunitedway.org](mailto:privacy@calgaryunitedway.org).