

## College-Montrose Children's Place Privacy Policy

New Version Presented and Approved by the Board of Directors June 7, 2023

College Montrose Children's Place (CMCP) is committed to protecting personal information it collects, uses and discloses in accordance with applicable legislation. This Privacy Policy is a statement of principles and guidelines for the protection of personal information of participants, donors, directors, volunteers and other supporters.

### Collection of Personal Information

CMCP collects personal information that is necessary for the operation of our agency and the provision of our services. 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, educational history, etc. CMCP collects personal information when you:

- Register with us or make use of our facilities and programs, events and services
- Volunteer with our organization, on your own, or as part of a structured placement;
- Make a donation—to verify and process credit card information, and to issue receipts.

This information may include:

- Family details, including:
  - Child's full name, date of birth, and health information
  - Parent/guardian full name, address, phone number, email address, and emergency contact information.
- Donor details, including name, address and financial information.

We collect personal information directly from participants, parents/guardians, volunteers, donors or authorized representatives. We may also collect personal information from other sources, such as partner organizations, with your consent.

### Use of Personal Information

We use personal information to provide services, to communicate with participants, volunteers, and donors, and to meet legal and regulatory requirements. This includes:

- Communicating with participants regarding operations, schedules, and updates
- Providing necessary health and safety information to staff;
- Creating and maintaining records required by law;
- To share impact stories of our participants, donors, staff and volunteers;
- To collect data for statistical purposes;
- For administration, management, strategic planning, decision-making, research, and allocating of resources within the CMCP;
- For fundraising and advertising;
- Payment processing.

We normally collect participants personal information directly from our participants. We may

collect your information from other persons with your consent or as authorized by law. We do not use personal information for any other purpose without your consent.

## **Consent**

We ask for consent to collect, use or disclose participant personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose.

We assume your consent to continue to use and, where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected.

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.

## **Disclosure of Personal Information**

We may disclose personal information to third parties, such as medical professionals or regulatory authorities, as required by law or to protect the safety of participants or children in our care. We may also disclose personal information to service providers who assist us in providing our services, such as payment processors or IT support.

We require all third-party service providers to comply with our privacy policy and applicable privacy laws.

## **Security of Personal Information**

We take reasonable steps to ensure the security of personal information in our possession. This includes:

- Physical security measures, such as locked filing cabinets and secure storage;
- Technological security measures, such as password-protected systems and firewalls;
- Policies and procedures for handling personal information (see Appendix A).

## **Use of Photos and Videos for Social Media and Other Publications**

We may occasionally film or photograph participants during our programming or special events. By registering for our programs and providing us with your personal information, you are consenting to its use in accordance with the principles outlined in this Privacy Policy. The Policy extends and applies to children under your care or custody.

CMCP will ask for an explicit permission on a separate waiver before using pictures or images for any social media or publications. Permission may also be granted via electronic means, such as an email or online form.

## **Access to Personal Information**

Individuals have a right to access their own personal information in a record that is in the custody or under the control of CMCP, subject to some exceptions. For example, organizations are required under the *Personal Information Protection Act* to refuse to provide access to information that would reveal personal information about another individual.

If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may make a request for access to your personal information by writing to the Executive Director. You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization. In addition, you may request a correction of an error or omission in your personal information.

We will respond to your request within 45 calendar days unless an extension is granted.

## **Electronic Communications**

We comply with Canada's anti-spam legislation (CASL) and we will not send you electronic communications in contravention of this law. As part of signing up to receive our services, you may have also opted in to receive email communications from us. If you opted-in to receive such communications, we may use the information to communicate with you regarding our services, provide you with other information that you request, and/or improve our service offerings.

You will always have the opportunity to "unsubscribe" from receiving any of our email or other communications at any time and we will ensure that our emails include instructions on how to unsubscribe if you no longer wish to receive future emails from us.

If you decide to unsubscribe, we will only contact you (i) for the purposes allowed under applicable law; (ii) to send you notices of changes to our Privacy Policy; or (iii) to receive service-related messages.

## **Contact Us**

If you have any questions or concerns regarding our privacy policy or the collection, use, or disclosure of personal information, please contact us at [info@cmcp.ca](mailto:info@cmcp.ca) or call 416-532-8100

## **Changes to our Privacy Policy**

We may revise our privacy policy from time to time to reflect changes in our agency operations or legal and regulatory requirements. We will post any updates on our website and notify participants of any material changes.

## Appendix A:

### Procedure for Handling Confidential Personal Information

1. Identification of Confidential Personal Information: All employees must be trained to identify what constitutes confidential personal information. This includes, but is not limited to, names, addresses, dates of birth, social insurance numbers, financial information, health information, and other personal identifiers.
2. Access to Confidential Personal Information: Access to confidential personal information should be restricted to employees who require it to perform their duties. Access should be granted based on a need-to-know basis.
3. Secure Storage: Confidential personal information should be stored securely in locked filing cabinets, password-protected electronic systems, or other secure locations. Electronic records should be backed up regularly.
4. Handling of Confidential Personal Information: Employees should only use confidential personal information for the purpose for which it was collected. They should not disclose it to anyone who is not authorized to receive it, except as required by law. Employees should not discuss confidential personal information in public areas or with unauthorized individuals.
5. Transmission of Confidential Personal Information: Confidential personal information should only be transmitted via secure means, such as encrypted emails or secure file transfer systems. Employees should avoid transmitting confidential personal information via unsecured email or fax.
6. Disposal of Confidential Personal Information: Confidential personal information should be disposed of securely when it is no longer required for its intended purpose or as required by law. Paper records should be shredded, and electronic records should be deleted securely.
7. Reporting Breaches: All employees must report any breaches or suspected breaches of confidential personal information immediately to their supervisor or designated privacy officer. The breach will be assessed, and appropriate actions will be taken to mitigate any risks and prevent future breaches.
8. Training and Awareness: All employees must be trained on the importance of protecting confidential personal information and the procedures for handling it. Regular training and awareness sessions should be conducted to ensure that employees remain up-to-date on best practices and procedures.
9. Review and Update: This procedure will be reviewed and updated as necessary to ensure that it remains effective and in compliance with applicable laws and regulations.