



**Giving in Action Society
Privacy Policy**

The Giving in Action Society recognizes the value of its relationships with grant recipients, volunteers, and employees, and is committed to respecting and protecting 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 information that is entrusted in us. Accordingly, Giving in Action Society complies with the ***British Columbia Personal Information Protection Act (PIPA)*** and the federal ***Personal Information Protection and Electronic Documents Act (PIPEDA)***.

Our privacy policy adheres to the 10 principles that comprise the Canadian Standards Association Model Privacy Code and form the basis of both pieces of legislation. These principles, and the Society's related policies, are set forth below.

Definition of Personal Information

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. Personal information does not include the name, title, or telephone number of a grant applicant, volunteer, or employee.

Policy

Principle 1 – Accountability

An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.

Accountability for the Society's compliance with privacy legislation rests with the designated Privacy Officer. The name and contact information of the Privacy Officer will be made available to interested individuals through the Society's website, its Privacy Statement or upon enquiring of the Society's staff.

Principle 2 – Identifying Purposes

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

- 2.1 The purposes will be limited to those which are related to our procedures and which a reasonable person would consider to be appropriate in the circumstances. We collect personal information concerning our applicants for the following reasons:
- To verify fund eligibility requirements and process grant applications
 - To protect against fraud or misuse of funds.
 - To keep applicants informed about Giving in Action Society's activities.
 - To promote opportunities for applicants and potential donors to support Vancouver Foundation.

The Society will 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.

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 The manner in which the Giving in Action Society obtains consent for the collection of personal information varies with the sensitivity of the information being collected. 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 obtain implied consent at the time of collection.

The principle requires “knowledge and consent,” and Giving in Action will make a reasonable effort to ensure that individuals are aware of the purposes for which information is collected at the time of collection. Individuals can give consent:

- In writing, such as when completing a Letter of Inquiry or Grant Application.
- Through an opt-out process, either by checking off a box on a form (i.e. media consent) or by contacting Giving in Action.
- Orally, either in person or by telephone.

Individuals may withdraw consent at any time, by any means, with reasonable notice to the Society.

3.2 The Giving in Action Society 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 public directories.

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 Giving in Action Society 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 Society will collect personal information by lawful means and will not mislead individuals about the purposes for which information is being collected.

Types and means by which information is collected by Giving in Action Society include:

(a) Information collected through the Giving in Action Society’s Letter of Inquiry process

- Contact information, date of birth, funding criteria and nature of request.

(b) Information collected directly from an applicant in the Application Process

- The Society will collect and record personal information provided to us by the applicant through correspondence, conversations or other forms of communications.

(c) Information Collected from Public Sources

These types and means of information collected are not intended to be an exhaustive list, and the Society may collect other information about an applicant from time to time 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 Giving in Action uses personal information for purposes other than those given at the time of collection, consent will be obtained for these purposes.

5.2 Giving in Action does not sell, rent, or trade mailing lists.

5.3 Personal information is disclosed to third parties who have signed an agreement binding them to Giving in Action privacy policies.

5.4 Personal information is disclosed to third parties, only after applicants give consent in the application stage for Giving in Action to share relevant file information to partnership funders (i.e. Variety Children's Charity) for the strict purposes of cost-sharing.

5.5 Giving in Action will not use electronic information to determine an applicant's identity unless required to do so as a part of an internal investigation or other law enforcement purpose, nor will Giving in Action disclose personal information with third parties unless required to do so by law.

5.6 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 Giving in Action will use its best efforts to ensure that information that 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 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 The Giving in Action Society is obligated to protect applicants' personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal. Security measures have been integrated into the day-to-day operating practices of the Giving in Action Society.

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).

7.4 Third parties are expected to safeguard personal information entrusted to them in a manner consistent with the policies of Giving in Action, 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 Giving in Action will be open about 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.

8.2. The information made available will include:

- a) The name or title and contact information of the Privacy Officer who is accountable for compliance with Giving in Action's policies and procedures, and to whom complaints or inquiries can be forwarded;
- b) the means of gaining access to personal information held by Giving in Action;
- c) a description of the types of personal information held by Giving in Action;
- d) a copy of any document that explains the Society's policies, procedures, standards or codes; and
- e) the types of information made available to third parties.

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 Giving in Action will respond to an individual's request within a reasonable length of time, but no longer than one month. 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 cost.

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

9.3 For the Society 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, Giving in Action will provide specific information about third parties to whom personal information has been disclosed.
- 9.5 When an individual successfully demonstrates the inaccuracy or incompleteness of personal information, the Society 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 Applicants may review the personal information the Society has recorded for that applicant, and only that applicant. Applicants may also provide written permission to the Society to permit another individual to review the personal information the Society has recorded for that applicant, but only for that applicant.

Principle 10 – Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.

- 10.1 The name of the Privacy Officer will be known to staff. Information on how to contact the Privacy Officer will be identified to other individuals periodically.
- 10.2 The Society will maintain procedures to receive and respond to complaints or inquiries about its policies and practices relating to the handling of personal information. The complaint procedures will be easily accessible and simple to use.
- 10.3 Individuals who make inquiries or lodge complaints will be given information by Giving in Action of the existence of relevant complaint procedures.
- 10.4 If a complaint is found to be justified, the Society will take appropriate measures, including revision of the personal information, and, if necessarily, amendment of Giving in Action's policies and practices.

Policy Review

This policy will be reviewed every 3 years, or as required.

How to Contact the Privacy Officer

Inquiries, complaints, or access requests should be addressed to: Privacy Officer, Giving in Action Society, Suite 1200, 555 West Hastings St., Vancouver, BC V6B 4N6, email: privacy@givinginaction.ca.