



helping children thrive

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<b>Policy Title</b>	<b>Privacy Policy</b>
<b>Policy Area</b>	<b>Development &amp; Communications</b>
<b>Policy Type</b>	<b>Operational</b>
<b>Policy Approver(s)</b>	<b>Board</b>
<b>Date of Approval</b>	<b>June 12, 2023</b>
<b>Next Review Date</b>	<b>June 2026</b>
<b>Effective Date</b>	<b>June 12, 2023</b>
<b>Policy History</b>	<b>Replaces December 11, 2017 and December 8, 2020 policy</b>
<b>Related Existing Policies, Procedures</b>	

## Purpose

The purpose of Canadian Feed The Children’s Privacy Policy is to ensure that CFTC, its directors, officers, employees, contractors, consultants, agents, volunteers, donors, partners, clients and community members (“CFTC Stakeholders”) act in accordance with the principle that an individual’s right to privacy is an essential right to be protected, and understand the importance of protecting personal information in their care or under their control. CFTC’s relationship with its supporters is founded on trust and CFTC is committed to maintaining this trust.

In accordance with the applicable legislation, the federal *Personal Information Protection and Electronic Documents Act* (PIPEDA) and *Law 25 of Quebec* and the *Quebec Civil Code* (“Applicable Legislation”), CFTC is committed to taking commercially reasonable steps to protect the privacy of individuals, whether they are donors, supporters, partners or volunteers. CFTC is committed to collecting, using and/or disclosing personal information responsibly and only to the extent necessary for the fulfillment of its charitable purposes and the services it provides. CFTC voluntarily commits to the principles contained in the legislation as laid out in this Privacy Policy.

## Scope

All CFTC Stakeholders.

### **Periodic Review and Amendments**

This policy shall be reviewed from time to time as required, but at a minimum every three years by the Board of Directors unless otherwise required. *CFTC reserves the right to change this policy at any time. CFTC regularly reviews its privacy practices and updates its Privacy Policy as required. CFTC's Privacy Policy will be posted on CFTC's website.* You should consult our website <https://canadianfeedthechildren.ca/policies-and-compliance/> on a regular basis to remain current.

### **Policy Statement**

This Policy has been written to comply with Applicable Legislation and is designed to assist you in understanding how CFTC collects, uses and safeguards your personal information and to assist you in making informed decisions about providing personal information to CFTC or using our website

This Privacy Policy applies to personal information about identifiable individuals, including CFTC donors, beneficiaries, supporters and volunteers, which is collected, used and/or disclosed by CFTC. . For purposes of this Privacy Policy, the term "personal information" means information about an identifiable individual, as more specifically defined by applicable privacy legislation. Please refer to the legislation for more information: [https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/r\\_o\\_p/](https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/r_o_p/), as well as *Quebec Law, Chapter P-39.1, Act respecting the Protection of Personal Information in the Private Sector, and the Civil Code of Quebec, especially Articles 35 to 40 thereof (Applicable Legislation).*

This Policy does not apply to the collection, use and/or disclosure of the following information:

- Personal information that is aggregated or anonymized in such a manner that it cannot be connected to a person; or
- Information that is publicly available.

By making a donation, requesting information, or registering for an account on our website, you are giving CFTC permission to collect some of your personal information and to contact you by way of the information provided for the purposes outlined in this Privacy Policy.

### **Personal Information Collected by CFTC**

In accordance with Applicable Legislation, personal information that may be collected, used and/or disclosed by CFTC includes **but is not limited to the following**:

- Full legal name
- Telephone number (i.e. home or mobile)

- ☐ Personal, business and work addresses
- ☐ E-mail and social addresses
- ☐ Gender
- ☐ Marital status
- ☐ Date of Birth
- ☐ Credit card/banking information
- ☐ Donation information

CFTC gathers personal information about you only when voluntarily submitted by you or otherwise only with your consent. By visiting and using our website you agree to the Privacy Policy.

### **Online Privacy**

CFTC may collect non-identifying information about visitors to our website in order to create summary statistics and to determine the level of interest in information available on CFTC's website. This information would include such items as the date and time the CFTC site was accessed and the web browser used.

CFTC collects information about users' site usage, including IP addresses, through the use of cookies. A cookie is a small piece of data that is sent to a user's Internet browser from a web server and stored on a user's computer's hard drive. A cookie cannot read data from a computer hard disk or read cookie files created by other websites.

CFTC uses cookies to identify which areas of the CFTC's website users have visited. Users can choose whether to accept cookies by changing the setting of their Internet browser. The website does not link IP addresses to any personally identifiable information.

Some third party applications used on CFTC's website set cookies. Google Analytics, a popular web analytics service provided by Google, uses cookies to help us analyze how visitors use CFTC's site. These cookies are specific to CFTC's websites and visitors are not tracked across websites belonging to other Google Analytics users. Note that Google Analytics stores its data within the United States of America and is subject to US laws. We use this data to understand site performance to serve you better. Those wishing to opt out of Google Analytics data collection should use the Google Analytics Opt-out Browser Add-on.

The social buttons on some of CFTC's web pages allow visitors to share content via social media, and use cookies to remember whether a user is logged in to the relevant social media network as they navigate CFTC's site. Some of CFTC's pages feature videos or photo slideshows embedded from YouTube, which uses cookies to remember user preferences and provide analytics.

In addition to the cookies used on CFTC websites, CFTC undertakes advertising through Google Adwords and social media sites like Facebook. Advertisements are displayed alongside Google search results or through Facebook sponsored stories. A cookie is set when someone clicks on

an advertisement. CFTC does not set these cookies but does make use of them in analyzing which advertisements are most successful. Again, these cookies provide IP addresses only and no identifying individual information.

For further information about cookies and for an explanation of how they can be disabled, you may visit [www.aboutcookies.org](http://www.aboutcookies.org).

If you do not consent to the use of cookies, you may opt out, however, this may affect the efficiency of the Site for you.

## **Principles**

CFTC has included the following ten (10) privacy principles as detailed in Applicable Legislation. These principles form the basis of this policy.

### **1. Accountability**

CFTC is responsible for the personal information collected and maintained by it and which is under its control. CFTC's designated Privacy Officer is the VP Philanthropy, Brand & Communications. This individual is accountable for CFTC's compliance with this policy. There are other individuals within CFTC who are responsible for day-to-day collection and management of personal information. The information for contacting the Privacy Officer is found on the last page of this Privacy Policy.

CFTC has taken the following measures to ensure compliance with this Privacy Policy:

- Has developed procedures to protect personal information;
- Has developed procedures to receive and respond to complaints and inquiries;
- Has trained staff about our Privacy Policy and privacy practices respecting personal information; and
- Develops and distributes information to our staff and the general public explaining our Privacy Policy and privacy practices respecting personal information.

### **2. Identifying Purposes for Which Personal Information is Being Collected and Used**

CFTC is committed to openness regarding its collection and use of personal information. CFTC will identify the purposes for which personal information is collected and used at or before the time the information is collected.

CFTC collects personal information for the following purposes:

- To provide programs and services in accordance with our mission. Our mission is described as follows:  
To unlock children's potential through community-led action in Canada and around the world.
- To facilitate donation collection and processing; to establish and maintain our donor lists;

and to provide services to our donors. If a donor provides personal information to CFTC, CFTC will record and maintain this personal information in the donor database in order to issue charitable receipts for income tax purposes and/or to administer pre-authorized recurring donations.

- To promote fundraising activities, such as specific fundraising campaigns or donation drives. However, all requests from donors not to be contacted by CFTC will be honoured in a timely fashion.
- To communicate relevant news and updates, to invite supporters to special events and/or to send them newsletters or information about CFTC and its programs. CFTC is committed to complying with Canada's Anti-Spam Legislation (CASL) with respect to CFTC's distribution of such materials.
- CFTC does not share, trade or rent out our donor's personal information with other charitable or not-for-profit organizations to assist in fundraising activities.
- CFTC may collect personal information from volunteers. If you apply to volunteer with CFTC, we collect personal information required to determine your eligibility, to match your skills with CFTC's volunteer needs and to ensure your safety when working as a volunteer.
- CFTC also collects and uses personal information for internal research purposes and to provide you with support and help.

CFTC will not use or disclose for any new purposes personal information that has been collected from individuals, without first identifying and documenting the new purposes and obtaining the prior consent of such individuals.

### **3. Consent**

CFTC collects personal information about you only when you voluntarily provide it or otherwise only with your consent as required by Applicable Legislation or other applicable law.

CFTC is committed to ensuring that individuals are aware of how their personal information is used. CFTC will seek consent for the use or disclosure of personal information at the time of its collection.

If CFTC decides to use personal information of a supporter for a new purpose, CFTC shall obtain consent from the supporter before the personal information is used or disclosed for a new purpose.

As well, CFTC may periodically request written or verbal confirmation from a supporter to ensure that the personal information that has been collected and maintained on the donor database/fund development system is up-to-date and accurate.

An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. CFTC also provides opportunities for donors to opt-out of use or disclosure of their personal information. If you do not wish to receive communications from us or participate in more personalized information and services, you may easily unsubscribe

by following the directions provided in the communication that was sent to you or by contacting our Privacy Officer described above and below.

#### **4. Limiting Collection**

CFTC limits the collection of personal information only to that information that is necessary for the purposes as stated above. In addition, CFTC is committed to collecting personal information in a fair, open and lawful manner.

#### **5. Limiting Use, Disclosure and Retention**

CFTC will not use or disclose personal information for purposes other than those for which it was originally collected unless it has first obtained the consent of the individual from whom such information was received or if required to do so by law.

CFTC will limit access to personal information to those employees and agents whose duties reasonably require it, and who are granted access to personal information.

CFTC may disclose your personal information to third party service providers whom we engage to perform services on our behalf, such as to mail our fundraising material, or to process your donation. These third-party service providers only have access to personal information that is needed to perform the related function and may not use it for any other purpose. We enter into agreements with such third-party service providers requiring them to provide a level of security comparable to that provided under our Privacy Policy.

CFTC reserves the right to disclose and/or transfer personal information to a third-party in the event of a proposed or actual purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposal, transfer or conveyance of all or any portion of CFTC in order for you to continue to receive the same services from the third party, provided such third-party agrees to be bound by comparable conditions as set forth in this Privacy Policy.

CFTC does not disclose credit card account information provided by users except to the appropriate banking institutions or payment processing provider in order to process a credit or debit authorization for payment, or to resolve a dispute.

In certain circumstances CFTC may be required to disclose personal information without your consent, if required by law, for example, to satisfy a government request, subpoena or court order.

CFTC retains personal information only as long as is necessary for the fulfillment of those purposes for which it was collected or as required by law, and your consent to such purposes(s) remains valid after termination of our relationship with you.

In the event a business transaction is effected, assignees or successors of CFTC or its activities or assets or those of its affiliated entities, may use and disclose personal information only for

the purposes set out in this Privacy Policy, unless further consent is obtained.

When your personal information is no longer required for these reasons, we will make all reasonable efforts to ensure that all electronic and hard copies of such information are destroyed and deleted from our systems. However, where your information has been provided to third parties in context of a credit assessment or credit reporting, these third parties such as financial institutions and credit reporting agencies may retain the information according to their own retention policies.

## **6. Accuracy**

CFTC is committed to maintaining accurate, complete and up-to-date personal information. Individuals are encouraged to update their personal information to maintain the integrity of CFTC's records. Any such changes will be recorded on a timely basis.

On occasion, CFTC will have to proactively seek updated information about donors (such as a new address) to ensure the accuracy of our database and the provision of tax receipts for donations.

Individuals may make or request modifications or corrections to their personal information, if necessary, and donors may also access the following link to update their information:

<http://www.canadianfeedthechildren.ca/donor-support/update-details/>

## **7. Safeguards**

CFTC implements security safeguards to protect personal information against such risks as theft or loss, or unauthorized access, copying, use, modification or destruction.

CFTC implements physical security measures to protect personal information, such as locked cabinet storage and restricted access to areas where personal information is stored.

CFTC makes commercially reasonable efforts to implement security safeguards, including password and encryption security measures, to prevent unauthorized access to personal information stored on computer systems.

CFTC implements internal employee security measures to protect personal information, including restricting computer access, and limiting access to where personal information is stored. CFTC will also ensure that any of our staff who deal with personal information are properly trained and are aware of the necessary and appropriate measures required to protect personal information.

With respect to the handling of credit card information, CFTC adheres to Payment Card Industry Data Security Standards (PCI DSS) and uses the facilities of a PCI DSS compliant payment processor to securely store your payment card details.

CFTC uses Transport Level Security (TLS).technology to help ensure the safety and security of online donations. TLS technology enables encryption of sensitive information, including passwords and credit card numbers, during your online transactions.

CFTC is committed to safeguarding personal information when transferring/delivering it to third party service providers by stipulating in agreements the confidentiality of the information and the purposes for which it is to be used and the requirement that they provide a level of security comparable to that provided under our Privacy Policy.

CFTC provides on the job coaching and awareness to reinforce the importance of safeguarding personal information in addition to employee training.

While CFTC strives to use commercially acceptable means to protect personal information, we cannot guarantee its absolute security.

#### **8. Openness**

CFTC makes information about its Policy and practices respecting the collection and maintenance of personal information available to all interested parties. The CFTC Privacy Policy, as updated from time to time, is made available on CFTC's website.

CFTC will answer any questions that an individual may have regarding the collection and maintenance of personal information.

#### **9. Individual Access**

Upon request, CFTC shall inform an individual of the existence, use and disclosure of their personal information and shall give the individual access to that information. An individual has the right to challenge the accuracy and completeness of their personal information and have it amended as appropriate.

Requests are to be directed to: Vice President, Philanthropy, Brand & Communications  
Canadian Feed The Children 2 Lansing Square, Suite 901  
Toronto, Ontario M2J 4P8  
Phone: 416-757-1220 or 1-800-387-1221  
Email: [contact@canadianfeedthechildren.ca](mailto:contact@canadianfeedthechildren.ca)

CFTC will make every effort to respond to requests for access to personal information in a reasonable and timely manner.

Donors may also manage their personal information online through the following link:  
<http://www.canadianfeedthechildren.ca/donor-support/update-details/>



## **10. Challenging Compliance**

Please direct any questions, concerns or requests regarding our Privacy Policy or privacy practices to the Vice President Philanthropy, Brand & Communications at the address, phone or email provided above.