

# ST. LAWRENCE YOUTH ASSOCIATION: POLICIES AND PROCEDURES

## Chapter Thirteen

<b>Section:</b> HUMAN RESOURCES	<b>Policy:</b> Donor Privacy Policy
<b>Approved Date:</b> September 12, 2023	<b>Policy Number:</b> 13.1

### ***Purpose:***

The purpose of this policy is to ensure the ongoing protection and privacy of our donors. Protecting the privacy and confidentiality of donor information is an important aspect of the way the St. Lawrence Youth Association (SLYA) conducts its business. Collecting, using, and disclosing donor information in an appropriate, responsible, and ethical manner is fundamental to SLYA operations.

St. Lawrence Youth Association strives to protect and respect the personal information of its donors in accordance with all applicable provincial and federal laws. Every SLYA employee, volunteer, or person conducting business on behalf of SLYA, must abide by the Donor Privacy Policy when handling donor information.

### ***Definitions***

**Personal Information:** The [Personal Information Protection and Electronic Documents Act](#) (PIPEDA) defines personal information as information about an identifiable individual but does not include the name, title, business address, or telephone number of an employee of an organization (Department of Justice, 2011).

For the purposes of the Donor Privacy Policy, personal information shall be defined as; any identifying information about an individual or group of individuals, including name, date of birth, address, phone number, e-mail address, social insurance, nationality, gender, health history, financial data, credit card number(s), bank account number(s), assets, debts, liabilities, payment records, credit records, loan records, opinions, and personal views.

Business information is defined as SLYA, business address, business telephone number, name of owner, executive officer, and director, job titles, business registration numbers, and financial status. Business information is treated and handled with the same level of confidentiality, privacy, and respect as personal information.

### ***Guidelines***

Consent occurs and is obtained when an individual signs an application or other form containing personal information, thereby authorizing SLYA to collect, use, and disclose the individual's personal information for the purposes stated on the form or in this policy.

Implied consent is granted by the individual when he/she signs the application or form. This allows SLYA to obtain or verify information from third parties (such as banks, credit bureaus, lenders, or insurance companies) in the process of assessing the eligibility of an individual, customer, client, job applicant, or business partner.

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SLYA collects and uses personal information solely for conducting business.

### *Procedures*

1. SLYA assumes full accountability for the personal information of Donors within its possession and control. This organization has appointed the Executive Director as custodian of all privacy matters and legal compliance with privacy laws.
2. SLYA obtains personal information directly from the Donor, to which the information belongs. Individuals are entitled to know how SLYA uses personal information and this organization will limit the use of any personal information collected only to what is needed for those stated purposes.
3. SLYA will obtain individual consent if personal information is to be used for any other purpose.
4. SLYA will not use any personal information without the explicit consent of the Donor.
5. Under no circumstances will SLYA sell, distribute, or otherwise disclose personal information or contact lists to third parties; however, limited disclosure may be required as part of Youth Diversion fulfilling its business duties and operations. This may include consultants, or business partners of SLYA, but only with the understanding that these parties obey and abide by the Donor Privacy Policy, to the extent necessary for fulfilling their own business duties and operations.
6. SLYA will retain personal Donor information only for the duration it is needed for conducting business. Once personal information is no longer required, it will be destroyed in a safe and secure manner. However, certain laws may require that certain personal information be kept and maintained for a specified amount of time. Where this is the case, the law will supersede this policy.
7. SLYA vows to protect personal information with the appropriate security measures, physical safeguards, and electronic precautions. SLYA maintains personal information through a combination of paper and electronic files. Where required by law or disaster recovery/business continuity policies, older records may be stored in a secure, offsite location.

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8. Access to personal information will be authorized only for the employees and other agents of SLYA who require the information to perform their job duties, and to those otherwise authorized by law.
9. SLYA's computer and network systems are secured by complex passwords. Only authorized individuals may access secure systems and databases.
10. Active files are kept in locked filing cabinets.
11. Routers and servers connected to the Internet are protected by a firewall and are further protected by virus attacks or "snooping" by sufficient software solutions.
12. Personal information is not transferred to volunteers, summer students, interns, or other non-paid staff by e-mail or any other electronic format.
13. SLYA's Web site shall include our Donor Privacy Policy and disclose our personal information practices.
14. In most instances, SLYA will grant Donors access to their personal information upon presentation of a written request and satisfactory identification. If a Donor finds errors of fact with their personal information, please notify SLYA as soon as possible to make the appropriate corrections.
15. SLYA may use personal information without the individual's consent under particular circumstances. These situations include, but are not limited to:
  - SLYA is under legal obligation to disclose personal information in order to adhere to the requirements of any Federal, Provincial, or Municipal investigation, under the purview of the appropriate authorities.
  - An emergency exists that threatens an individual's life, health, or personal security.
  - Donor information is for in-house statistical study or research.
  - Disclosure is required to investigate a breach of contract.

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Any questions or concerns regarding this Donor Privacy Policy are to be addressed by contacting SLYA.

SLYA shall investigate and respond to concerns about the handling of the Donor’s private and personal information within (three business days).