



PRIVACY POLICY

Personal Information Protection

Approved November 2004

The Primate's World Relief and Development Fund
80 Hayden Street Toronto, Ontario M4Y 3G2
Phone: 416-924-9192 Toll Free: 1-866-308-7973
Fax: 416-924-3483
General E-mail: pwrdf@pwrdf.org
Web site: <http://www.pwrdf.org>
Charitable Number: 8664 34640 RR0001

PRIVACY POLICY

Personal Information Protection Policy

OUR COMMITMENT

The PWRDF is committed to protecting the privacy of the personal information of its employees, members, donors and other stakeholders. We value the trust of those we deal with, and of the public, and recognize that maintaining this trust requires that we be transparent and accountable in how we handle personal information.

The information you provide will be used to keep you informed and up to date on the activities and programs of the PWRDF, our funding needs, and opportunities to volunteer or to donate, through periodic contact. If at any time you wish to be removed from any of these contacts, simply advise the PWRDF Privacy Officer, and we will respectfully accommodate your request.

Scope of this Policy

The PWRDF will observe the principles of the Personal Information Protection and Electronic Documents Act (“PIPEDA”) with respect to the collection, use and disclosure of personal information.

DEFINITIONS FOR THE PURPOSES OF THIS POLICY:

collect

means to gather, receive, or obtain personal information from any source or by any means.

personal information

means any factual or subjective information, recorded or not, about an identifiable individual, except the name, title, business address, business telephone number and business email address of an individual and includes, but is not limited to, the individual's address, birthdates, gender, employment, bank account number, credit card number, donation history, or other financial information.

disclose

means to make known or reveal personal information by any means to any persons outside the organization.

donor

means an individual who has in the past, or it is anticipated may in the future, make a donation to PWRDF.

third party

means a person, organization or association other than the PWRDF, or an employee of PWRDF or volunteer working at PWRDF.

use

means to review, access, employ or apply personal information for any purpose by and within the PWRDF.

PIPEDA Principles

1. Accountability

The PWRDF is responsible for all personal information under its control. Its Privacy Officer is accountable for compliance with the principles as set out in Schedule 1 of the PIPEDA.

The PWRDF Privacy Officer and contact information is as follows:

*Jill Martin, Financial Manager
PWRDF
80 Hayden Street
Toronto, ON M4Y 3G2
(416) 924-9199 ext. 301 E-mail: jmartin@pwrdf.org*

Under this Principle, PWRDF is responsible for personal information in its possession or custody, as well as for personal information that is in transit to a third party for processing. PWRDF will ensure that third parties give an appropriate level of protection to personal information while it is being processed.

PWRDF is establishing and implementing:

- *Policies and procedures to protect personal information;*
- *Policies and procedures to receive and respond to complaints and inquiries*
- *Practices to ensure access to this policy*

2. Identifying Purposes

The purposes for which personal information is collected will be identified and documented by the PWRDF at or before the time of collection.

The PWRDF may collect personal information concerning donors for one or more of the following reasons:

- *To administer and maintain accounts relating to donations.*
- *To facilitate fundraising for the work of the PWRDF*
- *To communicate with donors and the PWRDF constituency*
- *To comply with legal and regulatory requirements.*

3. Consent

Consent, either express or implied, is required and will be obtained by informing the individual in a meaningful way of the purpose for the collection, use or disclosure of personal data, before or at the time of collection.

4. Limit Collection

The PWRDF will limit the amount and type of information gathered to what is necessary for the identified purposes and on request, explains why the personal information is required.

5. Limit Use, Disclosure and Retention

The PWRDF will not use or disclose personal information for purposes other than that for which it was collected, except with the consent of the individual or as required or permitted by law. Retention of this information will be as necessary to fulfill these purposes.

The PWRDF will institute maximum and minimum retention periods taking into account any legal requirements or restrictions and provide any individual the opportunity to obtain access to their own information.

The PWRDF will document any new purpose for the use of personal information.

The PWRDF will dispose of personal information in a way that prevents improper access.

6. Accuracy

The PWRDF will keep personal information as accurate and complete as is necessary to fulfill the purposes for which it is to be used, taking into account the interests of the individual.

7. Safeguards

The PWRDF will take all necessary precautions to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, modification or disposal, regardless of the format in which it is held.

The nature of the safeguards will vary depending on the sensitivity of the information that has been collected, the amount, distribution, format and the method of storage.

The methods of protection will include:

- *Physical measures, including locked filing cabinets and restricted offices*
- *Organizational measures, such as security clearances and limiting access on a “need to know” basis*
- *Technological measures, such as the use of passwords and encryption.*

8. Openness

The PWRDF will be open about its policies and procedures with respect to management of personal information. It will ensure individuals have access to the policies and practices for the management of personal information and that this information is available in a form that is generally understandable.

Copies of this Privacy Policy will be made available on request

9. Individual Access

Upon written request, the PWRDF will inform an individual of any personal information on file about them, including how it has been used.

If the accuracy or completeness of any personal information is challenged and found to be deficient, the PWRDF will make the necessary corrections or amendments.

10. Challenge Compliance

The PWRDF will investigate all complaints made in writing, that challenges compliance with any of the principles of this policy. If the complaint is found to be justified, the PWRDF will take appropriate action, including, if necessary amending its policies and practices.