



Big Brothers Big Sisters of South Huron
Marketing and Communications Policies and Procedures Manual

Policy	Policy #	MC - 001
Privacy Policy	Issued By	Board of Directors
1 of 3	Issue Date	

STATEMENT AND PURPOSES

Big Brothers Big Sisters of South Huron (BBSSH) respects your privacy and is committed to protecting personal information you provide to us. BBSSH is committed to ensuring compliance with applicable federal and provincial privacy legislation.

This statement explains our policies and practices regarding the use and disclosure of your personal information by BBSSH. Please note that BBSSH reviews and updates this policy from time to time as needed. You may also request a copy of an up to date privacy statement by contacting us at the phone number or e-mail address listed below.

Implementation

BBSSH is accountable for the personal donor, client, applicant, employee, and volunteer information under its control. BBSSH has named the Executive Director as Chief Privacy Officer, who is responsible for the Agency's compliance with this Policy.

Purposes for Collection, Use and Disclosure

BBSSH collects and uses personal information for purposes authorized and required by the applicable privacy legislation. Information you provide will be used periodically to keep you informed of BBSSH, including programs, services, opportunities to volunteer, events, funding needs, membership benefits and for the following purposes:

1. Assessing client needs and providing for those needs.
2. Determining eligibility and continuing suitability for:
 - a. Volunteer participation;
 - b. Employment within Agency;
 - c. Client participation; and
 - d. Funding and programs.
3. Distribution of Agency information, events and fundraising.
4. Issuing tax receipts.

Limits on Collection of Personal Information

BBSSH will not collect personal information indiscriminately and will limit collection of personal information to that which is necessary to the purposes articulated above, and what is reasonable and necessary for any purposes consented to by an individual. Personally identifiable information is not collected unless specifically submitted via an online registration function or registration form (memberships, events, applications and surveys for example), an electronic mail message, a phone call or postal mail. All information is kept confidential. BBSSH obtains and retains an individual's consent for the personal information it collects. BBSSH will not maintain records on individuals without permission.



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Use or Disclosure of Personal Information

Personal information will only be used by BBBSSH or disclosed to third parties for the purposes set out above or as required by law. If personal information is disclosed to third parties for the fulfillment of any purposes identified above, BBBSSH will ensure that the appropriate security undertakings are employed to protect the transfer and use of personal information to third parties.

Safeguards

BBBSSH protects personal information with appropriate security safeguards. Safeguards include physical, administrative and electronic security measures.

Disclaimer

The website of BBBSSH provides links to other third party websites. These are provided for convenience only and you access them at your own risk. Even if a third party is associated with BBBSSH through a business relationship or otherwise, BBBSSH is not responsible for the privacy policies or practices or content of such third party websites.

Access

You have the right to access your personal information under the control of BBBSSH. The Privacy Officer will assist you with your access requests. In certain exceptional situations, BBBSSH may not be able to provide access to certain personal information that it holds about you. If access cannot be provided, BBBSSH will notify you, in writing, of the reasons for the refusal.

PIPEDA Ten Fair Information Principles

1. Accountability
2. Identifying purposes
3. Consent
4. Limiting collection
5. Limiting use, disclosure, and retention
6. Accuracy
7. Safeguards
8. Openness
9. Individual access
10. Challenging compliance

Big Brothers Big Sisters of South Huron will ensure that any private employee information that is collected adheres to the principles outlined below:



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1. **Accountability:** BBBSSH is responsible for all employee personal information under its control and will ensure its accountability to the 10 Fair Information Principles.
2. **Identifying purposes:** BBBSSH will always identify to employees why their personal information is being collected.
3. **Consent:** Employee consent is required for the collection, use, or disclosure of employee information, as appropriate.
4. **Limiting collection:** BBBSSH will only collect the personal employee information that is required for the administration of pay, benefits, and other human resource activities. This information will always be collected in fair and legal ways.
5. **Limiting use, disclosure, and retention:** Unless required by law, all private employee information collected by BBBSSH will only be used for the purposes for which it was collected. Private employee information will only be retained as necessary to serve the purposes for which it was collected.
6. **Accuracy:** BBBSSH will maintain personal employee information as accurate, complete, and as up-to-date as possible. BBBSSH may request periodic updates from its employees to ensure that the information on file is accurate.
7. **Safeguards:** BBBSSH will protect any personal employee information it has collected, either by locked filing cabinets, encrypted drives, or any other means necessary to ensure the privacy of the information.
8. **Openness:** BBBSSH will disclose its purposes for the collection of employee information and will have this information available upon request from employees.
9. **Individual access:** Employees of BBBSSH have the right to view what personal employee information has been retained. Further, employees may challenge the accuracy of this information and make modifications to the information, as necessary.
10. **Challenging compliance:** While BBBSSH is not subject to the compliance regulations under PIPEDA, it will endeavour to meet or exceed the principles established by the Act. Should an employee bring forward a way that BBBSSH could improve the safety of personal employee information, they may bring it forward to the Executive Director.

Concerns or Questions Regarding Big Brothers Big Sisters of South Huron Compliance

We do not rent sell or trade our mailing lists. The information you provide will be used to deliver services and to keep you informed and up to date on the activities of BBBSSH including programs, services, special events, funding needs, opportunities to volunteer or to give, open houses, and more through periodic contacts. If at any time you wish to be removed from any of these contacts, simply contact us by phone or via e-mail and we will gladly accommodate your request. You may direct your questions regarding BBBSSH's compliance with this policy to the Privacy Officer, Amy Wilhelm, Executive Director, at 519-235-1780 or southhuron@bigbrothersbigisters.ca.

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