

## Privacy Policy

This policy outlines United Way Greater Toronto's (UWGT) commitment to respecting the privacy of personal information of individual persons and explains how we collect, use, protect and disclose personal information. This includes the personal information of donors, prospective donors, board members, volunteers, individuals who engage with us on community initiatives, and our staff.

This policy governs the activities of UWGT. UWGT is an autonomous organization, legally separate from United Way of Canada and other United Ways. While all United Ways share a commitment and respect for personal information privacy, details on how each United Way does so can be obtained by contacting the United Ways individually.

### Our Commitment to Protecting Your Privacy

UWGT embraces the principles of the Canadian Standards Association Model Code for the Protection of Personal Information and will control the collection, use, and disclosure and disposal of personal information in keeping with those principles.

UWGT recognizes that we rely on the support of hundreds of thousands of individuals who engage with us in support of their community. We recognize that information is precious, and our supporters trust us to treat their information with respect for their privacy and a commitment to protecting the confidentiality of data. It is essential that we protect the privacy of the personal information individuals may choose to share with us or that we may gather by other lawful means.

### What is Personal Information?

Personal information refers to information about an identifiable individual, but excludes certain business contact information, specifically name, title, business address or telephone number of an employee of an organization. From time to time, UWGT may, acting reasonably, collect information about identifiable individuals from published or public sources for the purposes of developing relationships with individuals.

The areas in which UWGT collects and uses personal information in accordance with this policy are principally, but not limited to:

**Community:** UWGT's work to improve social conditions involves working with individuals acting on their own initiative or as representatives of community agencies, governments and other partner organizations that share common social objectives. UWGT gathers and uses personal information to keep individuals informed about relevant UWGT activities and work, and with permission may share personal information with others who share similar social objectives and a desire for networking. UWGT also gathers and uses personal information to provide professional

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development programs in the sector and with permission, shares personal information with previously identified program partners or vendors for the purposes of conducting program activities.

**Donations:** UWGT will collect and use personal information necessary to process donations and payments, redirect a donation or any part of a donation to another charity as instructed by the donor, issue tax receipts, confirm renewal of giving and maintain a donation history, keep donors informed about giving opportunities and the work of UWGT, acknowledge and recognize donations, and comply with federal and provincial regulatory guidelines and reporting requirements.

**Workplace Philanthropy:** UWGT supports workplace organizations who wish to run internal employee giving and engagement philanthropy programs. UWGT may be provided with employee names, business contact information and other employee-related information in order to provide personalized giving and volunteering experiences, whether paper pledge forms or secure online systems, to carry out workplace philanthropy programs. UWGT will work with organizations delivering workplace campaigns to determine data needs that ensure an optimal experience for employees and which also meets the organization's personal data management policies. The data provided to UWGT is used only for the purposes of setting up the systems and facilitating the workplace philanthropy program. In some situations, the workplaces run philanthropic programs that reach beyond employees to include other related individuals such as retirees or contractors. UWGT follows the same practices in working with organizations in these situations as with employees.

**Volunteering:** UWGT will collect and use personal information to establish and maintain the volunteer relationship, assist volunteers in performing their volunteering roles and responsibilities, and keep them informed about relevant UWGT activities and the work of UWGT.

**Event Participation:** UWGT will collect and use personal information necessary to communicate with individuals about events, contests and promotions that they participate in, issues concerning related transactions, information about other events that they may be interested in and the work of UWGT; to recognize participation and award prizes; and to comply with federal and provincial regulatory guidelines and reporting requirements.

**UWGT Employees:** UWGT collects and uses personal information to establish, maintain, administer and terminate the employment relationship including ongoing obligations regarding benefits, medical history and pension.

## Our Privacy Principles

The following principles reflect our pledge to protect the privacy of your personal information:

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## 1. Accountability

We are responsible for all personal information in our possession, including any personal information transferred to third parties for handling or administrative purposes.

We keep your personal information in strict confidence. All employees, agents (including authorized volunteers) and authorized service providers of UWGT are required to protect the confidentiality of your personal information. All employees and agents are required to sign and adhere to a Code of Conduct & Ethics which ensures they are informed about the importance of privacy protection. UWGT provides employees and agents with periodic information to ensure they are knowledgeable about our privacy policy and related policies.

Where we choose to have certain services, such as data processing, provided by third party service providers, we select the service providers carefully. We take all reasonable precautions to ensure that the service providers protect your personal information. These service providers enter into agreements with UWGT that confirm they have privacy and security standards comparable to our own.

## 2. Identifying Purposes

We collect, use and disclose personal information only for certain purposes that we identify to you. The purposes for which personal information is collected will be identified at the time the information is collected.

With your consent, we collect information about you for various purposes, including the following:

- Establish your identity.
- Administer your involvements with us, including your donations, event participation, community engagements, volunteering, or employment, and contact you about your continued involvement.
- Know who our donors, volunteers and other supporters are in order to manage and develop our resources to fulfill our mission to serve the greater good of the community.
- Respond to your information requests.
- Periodically, as we are able, send you literature on United Way or invite you to events or information sessions that are aligned with your interests
- Thank you and, with your consent, publicly recognize your financial or non-financial contributions.
- Share information with other individuals or organizations, including organizations which you redirect donations to, volunteer at on our behalf, or interact with on our behalf.

### REVIEW PROCESS

Policy Postings: WayIn, Website, Board Portal

Policy Version Date: June 2019

Review Frequency: every year

Most Recent Review Date: June 2019 Next Review Date: June 2020

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- Generate statistics and aggregate reporting to help us and our partner organizations understand where we can have greater impact on the community.
- Meet legal and regulatory requirements.

### 3. Consent

We obtain personal information about you lawfully and fairly. We collect, use or disclose your personal information with your permission, except where otherwise required or permitted by law.

Your permission may be expressed (orally, electronically or in writing) or may be implied (by an action or inaction).

You may withdraw your permission to the use and disclosure of your personal information at any time. We will comply, subject to legal, contractual or technical restrictions. For example, if you ask to not receive any mail from us, we take steps to suppress donation requests or general information, but we will still mail you a tax receipt for a donation or send you a statement of your outstanding payments against your pledged donation. Due to printing and distribution schedules, you may continue to receive some communications that were in process before we received your request. If there are various options to how we may handle your request, we will explain the options so that you can choose how you wish us to handle your request.

### 4. Limiting Collection

Personal information collected will be limited to that required for the purposes identified by us.

### 5. Limiting Use, Disclosure and Retention

We use your information for the purposes identified to you. When we intend to use your personal information for a purpose not identified to you when the information was collected, we will identify the new purpose and obtain your permission prior to use.

We do not sell your personal information.

We disclose your personal information in the following circumstances:

- In the case of donors giving through their workplace, your workplace has access to certain personal information in the execution of the Employee Campaign. UWGT is respectful of the donor's right to privacy and works with the individuals responsible for the Employee Campaign to limit with whom we share the information, and to only share information necessary for the purposes of the campaign. For example, if you make a donation by payroll deduction, we may provide the information necessary to

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correctly identify you on your payroll system and the amount of your donation to deduct from your pay. Furthermore, employers may have internal policies on their access and use of employee personal information; United Way respects and works within the requirements of your organization's policies.

- We share information with other United Ways if we administer a donation belonging to another United Way community. We disclose your information only to the specific United Way involved in your donation.
- If you designate your donation to another charity, we provide your name, workplace if the donation is part of an Employee Campaign, and designation amount to the selected charity. You may withdraw permission by contacting us. If you do so, we send the donation on an anonymous basis.
- We may contract with carefully selected third parties to perform services for us or on our behalf. When we select the third parties, we ensure that they use security and privacy standards comparable to our own.
- Where a third party hosts an event using UWGT's systems to register participants, your information may be shared with the host solely for the purposes of managing the event and your participation in the event.
- In all other situations, we will disclose your personal information only with your consent, or as otherwise required or permitted by law.

We will keep your personal information only as long as it is necessary to satisfy the purposes for which it was obtained, or as required by law. We have guidelines and procedures for the retention and destruction of personal information. When we destroy personal information, we will use safeguards to prevent unauthorized parties from gaining access to that information during the process.

### 6. Accuracy

We maintain appropriate procedures to ensure that personal information in our possession is as accurate and up to date as is necessary for the purposes for which it is to be used. We rely on you to provide us with any changes to your personal information, and in particular to your contact information.

If you believe any of the information we have collected about you is incorrect or incomplete, you have the right to ask us to change it or delete it. If your personal information is inaccurate or incomplete, we will make the necessary changes.

### 7. Safeguards

We maintain appropriate technical and organizational safeguards to protect your personal information against loss, theft, unauthorized access, disclosure, copying, use or modification.

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#### REVIEW PROCESS

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Access to your personal information is restricted to UWGT employees, agents and authorized service providers who need the information to fulfill the purpose for which the information was collected. UWGT will protect your personal information by safeguards that are appropriate to the sensitivity of that information and the format of the information, whether electronic or physical.

Our procedures include physical security measures, organizational measures including security clearances and limiting access on a "need-to-know" basis, and technological measures such as the use of passwords and encryption. When it comes to the handling of electronic records, UWGT adheres to Payment Card Industry Data Security Standards (PCI DSS).

### 8. Openness

UWGT's Privacy Policy is available to you at all times on our website. If you are unable to access our website or require our policy in another format, we will do our best to provide it in an alternative format that meets your requirements.

### 9. Individual Access

You may ask whether we hold any personal information about you, see your information and ensure that it is accurate. UWGT may ask that you submit your request in writing. UWGT will need to confirm your identity prior to disclosing any information to you, and may charge a reasonable fee to cover the cost of providing the information to you. If a fee is charged, UWGT will inform you of the approximate cost prior to providing the information to you.

You also have the right to know how we collected your personal information and how we are using it. We will inform you of the specifics to the best of our abilities.

### 10. Provide Recourse

UWGT has appointed a Chief Privacy Officer who is responsible for this Privacy Policy and our compliance.

If you have any privacy concerns, you may contact any of our employees that you normally interact with to discuss your concerns or requests. If you are unsure of whom to contact or have further concerns, you may contact the office of our Privacy Officer by email to [privacy@uwgt.org](mailto:privacy@uwgt.org).

You may register a privacy-related complaint by emailing UWGT's Privacy Officer. We will investigate all complaints. If an objection is justified, we will take all appropriate steps to repair the situation, including changing our policies and practices if necessary.



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## A note about our websites:

We collect two basic types of information on our websites, personally identifiable information which you submit and information about your interaction with our websites using digital markers such as cookies and web beacons. We collect personally identifiable information when you provide it to us by participating in certain activities that require response, registration or donations.

When you visit our websites, we also automatically log information about your visit. The information collected about your visit includes, but is not limited to:

- The current Internet protocol (IP) address and the type of computer operating system you are using (e.g. Microsoft Windows or Mac OS)
- The type of browser you are using (e.g. Firefox or Internet Explorer)
- The referring website that brought you to the UWGT website
- Your UDID (for mobile devices)
- The domain name of your Internet Service Provider
- Your activities while visiting the Website (e.g. which of our Web pages you viewed)

UWGT may use third-party services, such as Google Analytics to process this information. UWGT and its service providers use this information to analyze the performance and effectiveness of our website, for technical reasons to facilitate navigation through our website and to present personalized content. For example, in order to navigate through our online campaign tool, our Web server must recognize you in order to ensure that your donation is correctly applied and that you are able to navigate securely through the pages related to the campaign.

You may adjust your browser settings to reject digital markers, including cookies, if you so choose. Visiting our website with cookies disabled will have no significant impact on your ability to view our websites. However, session cookies must be enabled to use UnitedWay@work, our online campaign tool used to support workplace campaigns.

UWGT also uses technical methods for tracking purposes, including clear gifs (also known as web beacons) in HTML emails that we send to determine whether you have opened those emails and/or clicked on links in those emails. UWGT uses this information to analyze the performance and effectiveness of our emails.

You may be able to disable Web beacons in email messages by not downloading images contained in the message you receive (this feature varies depending on the email software you use).

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Event registrants and donors on our websites including UnitedWay@work, our online campaign tool used to support workplace campaigns, are linked to secure servers. UWGT uses a secure payment service for credit card transactions.

### Changes to this Privacy Policy:

UWGT may at any time, without notice to you and in its sole discretion, amend this policy from time to time. The most current version of this Privacy Policy is found on UWGT's website. Please review this policy periodically.

#### REVIEW PROCESS