



HABITAT FOR HUMANITY ONTARIO GATEWAY NORTH

Title: **Protection of Privacy Policy**

Policy Type: Governance

Status: Approved by Board of Directors 17 September 2009

Date Revised/Reviewed: March 15, 2012, April 17, 2014, August 23, 2017

Policy # GV-07

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## PROTECTION OF PRIVACY POLICY

### INTENT

The intent of the privacy policy is to protect the personal privacy of the affiliate's members, volunteers, families, customers, donors and staff in accordance with applicable provincial and federal statutes.

### POLICY

#### **A. Collection Of Personal Information**

Habitat for Humanity Ontario Gateway North is committed to identifying the purposes for which personal information is collected at or before the time the information is collected and to documenting the purposes for which personal information is collected. It is expected that every employee and volunteer will be familiar with the policy and will commit to protecting the privacy of personal information from all sources.

- 1.1 We may collect banking and credit card information to receive and process donations. In addition, we may collect contact information to acknowledge donations and issue tax receipts. We deeply appreciate financial support. We may contact people to inform them of and to request support for our future endeavors because they have demonstrated an interest in supporting Habitat's mission.
- 1.2 We may collect family selection information (such as names and ages of family members, current address, work history, income, assets, debt, credit history, general health, and condition and size of current dwelling) to determine if a family qualifies as a house recipient. The family selection information assesses credit-worthiness, need, stability of relationships, steady income, and willingness and ability to partner with Habitat.
- 1.3 We may collect mortgage application information to grant mortgage funds, collect mortgage payments and property taxes, transfer ownership to the family, engage professional mortgage administration and confirm payment of current property insurance.
- 1.4 We may collect family and neighborhood statistics to raise awareness of and increase potential for fundraising and new family applicants.
- 1.5 We may collect personal information from past, present and prospective volunteers, employees and members for administrative or management purposes, such as to establish, manage or terminate a volunteer, employment or member relationship.
- 1.6 We do not collect personal information indiscriminately. Both the amount and the type of information we collect is limited to that which is necessary to fulfill the general purposes outlined above.

- 1.7 We will not use previously collected personal information for a new purpose without first identifying the new purpose and obtaining consent for the new use, unless otherwise permitted by law.
- 1.8 Any questions concerning the collection, the use which will be made of the information, the categories of persons who will have access to it within the organization, the place where the file will be kept and your rights of access and rectification to our Privacy Officer.

## **B. Obtaining Consent**

Habitat is committed to obtaining consent for the collection of personal information and the subsequent use or disclosure of this information, unless otherwise permitted by law.

- 2.1 In obtaining consent, we make a reasonable effort to ensure that individuals are advised, in a manner that can be reasonably understood, of the purposes for which the information will be used.
- 2.2 We will not, as a condition to supplying a product or service, require consent to the collection, use or disclosure of personal information beyond that required to provide the product or service.
- 2.3 We collect personal information through fair and lawful means, and not through false or misleading practices.
- 2.4 In determining the appropriate form of consent, we will take into account the sensitivity of the personal information and reasonable expectations.
- 2.5 Individuals may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting our Privacy Officer. Please note that the withdrawal of consent may impact on our ability to serve an individual and to maintain our relationship.

Note: In certain circumstances personal information can be collected, used or disclosed without an individual's knowledge and consent. For example, legal, medical or security reasons may make it impossible or impractical to seek consent. When information is being collected for the detection and prevention of fraud or for law enforcement, seeking consent might defeat the purpose of collecting the information. Seeking consent may be impossible or inappropriate if an individual is a minor, seriously ill, or mentally incapacitated. In addition, we may not be able to seek consent if we do not have a direct relationship with the individual. For example, seeking consent may be impractical for a charity or a direct-marketing firm that wishes to acquire a mailing list from another organization. In such cases, the organization providing the list would be expected to obtain consent before disclosing personal information. Finally, we may collect information without consent if the collection is reasonable for the purposes of establishing, managing or terminating an employment or volunteer relationship.

## **C. Use And Disclosure Of Personal Information**

Habitat does not use or disclose personal information for purposes other than those for which it was originally collected, except with an individual's consent or as otherwise permitted by law.

3.1 We remain responsible for personal information in our possession or custody, including information that we transfer to a third party for processing. As such, we enter into confidentiality or contractual agreements with third parties which are engaged to perform services on our behalf and to whom we transfer personal information for processing requiring them to provide a level of security comparable to that provided under our Privacy Policy.

#### **D. Protection Of Personal Information**

Habitat is committed to protecting personal information by security safeguards appropriate to the sensitivity of the information.

4.1 We protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which it is held.

4.2 We protect personal information with physical security measures, such as locked filing cabinets and restricted access to areas where personal information is stored.

4.3 We protect personal information with organizational security measures, such as security clearances and limiting access to a “need-to-know” basis. In addition to ensuring our employees and volunteers are aware of the importance of maintaining the confidentiality of personal information, we also enter into confidentiality or contractual agreements with third parties to whom we provide personal information.

4.4 We use technological security measures, including passwords and encryption, to prevent unauthorized access to personal information stored on computer systems.

4.5 When disposing of or destroying personal information which is no longer needed, we ensure that appropriate measures are taken regarding the disposal or destruction so as to prevent unauthorized parties from gaining access to the personal information.

#### **E. Retention Of Personal Information**

Habitat is committed to retaining personal information only as long as necessary for the fulfillment of the general purposes outlined above or for the fulfillment of legal or business purposes.

5.1 We will retain personal information that has been used to make a decision for at least one year, even if retention is no longer necessary because the identified purpose for which the personal information was collected is no longer being served, to allow access to the information after the decision has been made.

5.2 We will retain personal information that is the subject of a request for as long as is necessary to exhaust any recourse under federal and provincial legislation across Canada, even if retention is no longer necessary because the identified purpose for which the personal information was collected is no longer being served.

## **F. Access To Personal Information**

Upon receipt of a written request, Habitat will provide information on the existence, use and disclosure of personal information and will give access to that information. Individuals are able to challenge the accuracy and completeness of the information and have it amended as appropriate.

**6.1** Upon receipt of a written request, we will provide an account of the use that has been made or is being made of personal information and an account of the third parties to which it has been disclosed. When it is not possible to provide a list of the third parties to which we have actually disclosed personal information, we will provide a list of organizations to which we may have disclosed personal information.

**6.2** In responding to a written request, we may require the requestor provide sufficient information to permit us to verify identification before we provide an account of the existence, use and disclosure of personal information. Please forward requests in writing to our Privacy Officer at the address set out herein.

**6.3** If assistance is required in preparing a written request, we will assist.

**6.4** Within 30 days after receipt of a written request, we will either respond to the query or send a notice of extension, advising of the new time limit, and the reasons for extending the time limit rights to make a complaint to the Commissioner. We may extend the time limit for a maximum of 30 days if meeting the time limit would unreasonably interfere with our activities or is impracticable because we need to undertake consultations necessary to respond to your query. Or, we may extend the time limit for whatever period is necessary to convert the personal information into an alternative format.

**6.5** We will respond to written requests at no or minimal cost. If there is a cost involved for the transcription, reproduction or transmission of personal information, individuals will be informed of the approximate cost beforehand and will only proceed if the individual has advised us that the request is not being withdrawn.

**6.6** The requested information will be provided or made available in a form that is generally understandable. For example, if we use abbreviations or codes to record information, we will provide an explanation of such abbreviations or codes.

**6.7** In certain situations, we may not be able to provide access to all the personal information we hold. Exceptions may include information that is prohibitively costly to provide, that contains references to other individuals, that cannot be disclosed for legal, security or commercial proprietary reasons, and that is subject to solicitor-client or litigation privilege. However, if the information containing the exceptions is severable, we will sever the information and provide the requestor with access to the remaining information.

**6.8** The reasons for denying access and the statutory provision on which the refusal is based will be provided in writing, along with any recourse under federal and provincial legislation across Canada.

### **G. Correction Of Personal Information**

Habitat is committed to maintaining as accurate, complete and up-to-date personal information as is necessary for the purposes for which it is to be used and to minimize the possibility that inappropriate information may be used to make a decision.

**7.1** We do not routinely update personal information unless such a process is necessary to fulfill the purposes for which the information was collected or we receive notification from an individual. If individuals are aware of changes to the personal information given us, they should simply write to our Privacy Officer and we will update our records accordingly.

**7.2** When the accuracy or completeness of personal information is successfully challenged, we will amend personal information as required and issue a copy of any personal information modified or added or an attestation that personal information has been deleted. Where appropriate, the amended information will be transmitted to third parties having access to the information in question.

**7.3** Any unresolved challenges will be recorded in the individual's file. Where appropriate, the existence of the unresolved challenge will be transmitted to third parties having access to the information in question.

### **H. Compliance**

In meeting our privacy responsibilities, Habitat will act in a reasonable manner as required by the circumstances.

**8.1** The Secretary of the Board of Directors has been designated as our Privacy Officer. The Privacy Officer can be reached by regular mail at:

ATTENTION: Privacy Officer

HABITAT FOR HUMANITY ONTARIO GATEWAY NORTH

1964 Muskoka Beach Road, R.R. # 1

Gravenhurst, ON P1P 1R1

Or by e-mail at [info@habitatgatewaynorth.com](mailto:info@habitatgatewaynorth.com)

**8.2** A challenge concerning compliance with privacy laws can be addressed to our Privacy Officer.

**8.3** We investigate all complaints. If a complaint is found to be justified, then we take appropriate measures to resolve the matter including, if necessary, amending our policies and practices.

**8.4** We reserve the right to seek legal advice where appropriate before providing a final response to inquiries or complaints.

## **I. Internet Usage**

When visiting Habitat's website at [www.habitatgatewaynorth.com](http://www.habitatgatewaynorth.com) to obtain information about us, whether it is to research our products and services, or to use our on-line tools, please rest assured that we do not collect identifying information unless specifically provided by the individual. The only information we collect is non-identifying information (such as the ISP, the type of Internet browser used, the referring web site, the pages requested, and the date and time of those requests) to create aggregate data in order to determine the level of interest in the information provided on the website and to improve the content of the website.

We collect this non-identifying information through the use of cookies and server log files, including IP addresses. Our website does not link IP addresses to any personally identifiable information. Cookies identify which areas of our website have been visited or customized, and make these pages readily accessible at the next visit. If individuals do not want non-identifying information collected through the use of cookies, they can disable by changing the setting of the Internet browser.

In addition, we may provide links to other websites managed by third parties or permit third parties to offer users subscriptions and registration-based services through its website. As we cannot control or be responsible for the actions or policies of such third parties, individuals should check the applicable privacy policy of such third parties when visiting their websites or when providing any personal information to them. Please also note that we cannot control or prevent the use of cookies or any information obtained through cookies by such third parties.

Finally, please be advised that information voluntarily disclosed online in discussion areas and other public areas of our website can be collected, used, and disclosed by third parties. Any submissions made to discussion areas or other public areas on our website are done at the user's risk and with the understanding that such information may be accessible to third parties. We cannot control and will not be liable for any damages that may arise from such user activity.

## **J. Changes To Privacy Policy**

Habitat for Humanity Ontario Gateway North reserves the right to modify our Privacy Policy at our sole discretion. In particular, the Privacy Officer will periodically review and modify our Privacy Policy in response to developments and changes in privacy law. Any modifications shall be effective immediately upon its publication by any means, including posting on this website. Individuals agree to regularly review our Privacy Policy posted at this website, be aware of any modifications and be bound by the same.

## **RESPONSIBILITY**

The Board of Directors is responsible to ensure that someone is appointed to the position of Privacy Officer, and that the person so appointed understands this policy, and their responsibilities in implementing the policy in Habitat for Humanity Ontario Gateway North. In the absence of a Privacy Officer, this role will fall to the Secretary of the Board, until a new Privacy Officer is appointed.

## **RATIONALE**

Habitat for Humanity Ontario Gateway North (“Habitat”) is dedicated to protecting your privacy and maintaining the trust that you have placed in it. As such, our privacy policy (the “Privacy Policy”) incorporates the highest standards as set out in federal and provincial legislation across Canada.