# Privacy of Personal Information Policy

In accordance with applicable laws, Christine's Place is committed to protecting the privacy of its clients, members, donors, volunteers, employees, directors, officers, and any other persons about or from whom Christine's Place collects personal information.

Christine's Place embraces the principles of the Canadian Standards Association Model Code for the Protection of Personal Information to ensure that all personal information is properly collected, used only for the purposes for which it is collected and disposed of in a safe and timely manner when no longer required.

#### 1. ACCOUNTABILITY

Christine's Place is responsible for maintaining and protecting the personal information under its control. Christine's Place has appointed a Privacy Officer who is responsible for ensuring that Christine's Place complies with its privacy obligations in accordance with applicable privacy laws.

## 2. IDENTIFYING PURPOSES

Christine's Place collects and uses personal information for a variety of purposes, including, but not limited to,

- providing services to individuals receiving services through Christine's Place;
- establishing and maintaining client files and contact information;
- managing payroll and benefits;
- employee performance evaluations;
- establishing and maintaining a donor management system, including donor contact information.

Christine's Place shall identify and explain the purposes for which it collects personal information to the person from whom the personal information is being collected, before or at the time the information is collected.

## 3. CONSENT

Consent will be obtained from the person whose personal information is collected, used and disclosed unless obtaining the consent would be inappropriate or not required by law. Sometimes the person's consent may be implied by virtue of their involvement or

support for Christine's Place or because of the person's conduct within Christine's Place.

When it is appropriate, written consent will be obtained.

Written consent will be kept on file for as long as the information is reasonably necessary.

A person may withdraw his or her consent at any time, subject to legal or contractual restrictions and reasonable notice. The person will be informed of reasonably foreseeable implications of the withdrawal.

# 4. LIMITING COLLECTION

Information collected will be limited to that required for the purpose or purposes identified by Christine's Place. Christine's Place is committed to collecting personal information in a fair, open and lawful manner.

## 5. LIMITING USE, DISCLOSURE AND RETENTION

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the person or as required by law. All collected personal information shall be destroyed, erased, or made anonymous as soon as the purpose for which it was collected is no longer relevant or as permitted by the law. Nothing in this Privacy Policy prevents the Christine's Place Board or its staff from collecting, retaining and using information related to individuals involved, supporting or receiving services through Christine's Place since such information assists in providing quality services to those involved or receiving services.

## 6. ACCURACY

Personal information shall be maintained in an accurate, complete and up-to-date format as necessary in order to fulfill the purposes for which it was collected.

#### 7. SAFEGUARDS

Personal information will be protected by security safeguards that are appropriate to the sensitivity of the personal information. This safeguarding could include physical measures such as locked filing cabinets and premises security, organizational measures such as

restricted access to files with personal information or technological measures such as strong passwords and security software.

## 8. OPENNESS

Information regarding the privacy policy procedures of Christine's Place, as well as the personal information management shall be available as requested. The information will include:

- Name and contact information of the Privacy Officer
- Means of gaining access to personal information held by Christine's Place
- Copy of any brochures or other information that explains Christine's Place policies, standards, or codes

#### 9. ACCESS TO PERSONAL INFORMATION

Access to personal information will be granted where Christine's Place is legally required to release the information and provided that the disclosure does not violate any applicable statutes or contracts to the person to whom the information pertains where there is an appropriate written request. The existence, use and disclosure of the personal information will be granted within a reasonable time. Any inaccuracy or incompleteness of personal information will be amended as required.

# 10. CHALLENGING COMPLIANCE

Complaints or inquiries about the collection, use, disclosure or retention of personal information and Christine's Place's compliance with these ten principles should be directed to the Privacy Officer. The Privacy Officer will investigate complaints and ensure that appropriate measures are taken.

## **SECURITY**

Christine's Place is committed to ensuring the security of your personal information. To prevent unauthorized access, maintain data accuracy, and ensure the proper use of information, we have

established and implemented appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect in person and virtually.

Christine's Place uses Internet Encryption Software. This protocol is used when collecting or transferring sensitive data, such as credit card information. Any information you enter is encrypted in your browser, sent over the public internet in encrypted form, and then decrypted at our server. Your personal information, credit card information, and any other personal information is received by a couple of designated trusted members of Christine's Place for processing.