

MOORELANDS COMMUNITY SERVICES

PERSONAL INFORMATION POLICY

INTRODUCTION

MOORELANDS is committed to respecting the privacy rights of all individuals by ensuring that their personal information is collected, used and disclosed in an appropriate manner.

MOORELANDS collects personal information about participants in its programs to be able to communicate effectively with, and provide services to, these participants and the community served by MOORELANDS. MOORELANDS collects personal information about donors, sponsors and benefactors. This facilitates communication with such individuals, which in turn enables MOORELANDS to undertake fundraising to support its programs and services. MOORELANDS also collects personal information about its employees and volunteers for purposes of personnel management and administration.

The *Personal Information Protection and Electronic Documents Act* (“PIPEDA”) is federal legislation governing the collection, use and disclosure of personal information, amongst other things, which came into effect in Ontario on January 1, 2004. The principals established in the personal information policy of MOORELANDS correspond to the principals set out in the Canadian Standard Association’s Model Code for the Protection of Personal Information, and conform with the requirements of PIPEDA. MOORELANDS may review and revise the personal information policy from time to time. In the case of amendment, a notice will be posted on www.moorelands.org, or published in appropriate MOORELANDS’ publications.

POLICIES

1. Accountability

MOORELANDS is responsible for all personal information under its control. The board of directors will designate an individual, known as the “Privacy Officer”, who will be accountable for compliance with the personal information policy of MOORELANDS. The Executive Director of MOORELANDS shall be the Privacy Officer.

MOORELANDS is committed to protecting personal information, and accordingly will include an appropriate level of protection in contractual

arrangements with third parties or obtain appropriate assurances from third parties who receive personal information from MOORELANDS.

MOORELANDS will ensure that all participants, donors, employees and other interested individuals have the opportunity to review, on request, and update their personal information on file with MOORELANDS. All such persons may direct questions and concerns to the Privacy Officer.

2. *Identifying the Purposes for Collection, Use and Disclosure of Personal Information*

MOORELANDS will identify the purposes for which it collects, uses and discloses personal information from time to time. Common purposes for the collection, use and disclosure of personal information include:

- i. to maintain complete and accurate files on all participants in its programs;
- ii. to maintain complete and accurate files on all donors, sponsors and benefactors;
- iii. to provide services to the participants in our programs, to communicate effectively with those participants and to communicate and work with third parties providing goods and services to those participants and programs;
- iv. to solicit support, both through fundraising efforts and otherwise, from donors, sponsors, benefactors and volunteers, and to communicate effectively with such individuals, which enables MOORELANDS to fulfil its objectives and mandate;
- v. to comply with lawful requests from governmental agencies such as Canada Customs and Revenue Agency and the Ontario Human Rights Commission; and
- vi. to maintain complete and accurate personnel files.

Written notification of such purposes will be communicated to interested individuals by posting the personal information policy on www.moorelands.org, by notice published in appropriate MOORELANDS publications, or in such other manner as is feasible in the circumstances.

MOORELANDS may identify additional purposes for the collection, use and disclosure of personal information. MOORELANDS will communicate such additional purposes by way of a notice posted on www.moorelands.org or by notice printed in appropriate MOORELANDS' publications.

3. *Consent*

MOORELANDS will obtain the consent from individuals for the collection, use or disclosure of their personal information. MOORELANDS will make every effort to obtain the express consent from an individual, although there may be circumstances where MOORELANDS will determine that implied consent has been given by an individual. Express consent can be given in writing or orally; implied consent will not be in writing, but the circumstances relating to the provision of implied consent shall be such that a reasonable person would conclude that the individual has consented, or would consent, if asked, to the collection, use or disclosure of his or her personal information.

There may be situations where consent is given orally, either in person or over the telephone. If MOORELANDS obtains oral consent from an individual, a note of that consent should be recorded by MOORELANDS and, if applicable, be included in the file of the participant, donor or other interested individual providing such oral consent.

MOORELANDS shall include on the application form for its programs an express statement that the individual signing the form is consenting to the collection, use and disclosure of his or her personal information. On any form used in fundraising, MOORELANDS shall include a statement that MOORELANDS may imply the consent of the individual who completes the form to the collection, use and disclosure of his or her personal information provided to MOORELANDS on the form.

The consent of an individual may be withdrawn at any time. MOORELANDS generally requires such withdrawal to be in writing, but will recognize verbal communication of withdrawal of consent when it is appropriate to do so in the circumstances.

4. *Limitations on the Collection of Personal Information*

MOORELANDS will only collect personal information which is necessary for the purposes which have been identified. Personal information shall be collected by fair and lawful means, and will not be collected for unspecified or improper purposes.

5. *Limitation on the Use, Disclosure and Retention of Personal Information*

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual providing the

personal information or except where use or disclosure is required or permitted under a legal duty or right. MOORELANDS does not disclose, or share personal information about its donors, sponsors or benefactors.

MOORELANDS will establish appropriate procedures for the retention of personal information.

6. *Accuracy*

MOORELANDS will make every reasonable effort to ensure that personal information collected by it will be as accurate, complete and up-to-date as possible for the purposes for which the information is to be used.

MOORELANDS will on an ongoing basis make every effort to ensure the accuracy and completeness of personal information under its control. An individual providing personal information will have the opportunity to do so in an accurate and complete manner.

MOORELANDS will develop a procedure to enable an individual to update personal information on file, on request. MOORELANDS will review regularly the accuracy and completeness of personal information on file.

7. *Safeguards*

MOORELANDS endeavours to maintain adequate procedural and technical security to protect personal information under its control and will implement security measures appropriate to the sensitivity of the information.

MOORELANDS shall ensure that its employees keep all personal information confidential and comply with the security standards established by MOORELANDS.

MOORELANDS shall require third parties to whom personal information is disclosed to commit to an appropriate level of security in respect of such information in compliance with the standards established by MOORELANDS.

On the disposal or destruction of personal information, MOORELANDS shall take the necessary precautions to prevent third parties from accessing such information and to maintain the confidentiality of such information.

8. *Transparency*

MOORELANDS will make available to any interested individual specific information about MOORELANDS's policy relating to personal information which is under the control of MOORELANDS. MOORELANDS will facilitate access to its personal information policy, and will make available information concerning the identity of its Privacy Officer, and the means by which a person can communicate with the Privacy Officer. MOORELANDS will also ensure that individuals are given access to their personal information.

9. *Individual Access to Personal Information*

An individual providing personal information to MOORELANDS has the right to access such information, and the right to ensure the accuracy and completeness of such information. An individual will be able to address the accuracy and completeness of his or her personal information and have it amended, if inaccurate or incomplete.

MOORELANDS will respond promptly to any request by an individual for access to his or her personal information.

MOORELANDS will maintain a complete record of third parties to whom personal information has been disclosed, and will make such record available to an individual whose personal information has been so disclosed.

10. *Questions and Concerns Regarding Compliance with this Policy*

An individual providing personal information to MOORELANDS may address any question, concern or complaint regarding MOORELANDS' compliance with the personal information policy to the Privacy Officer.

MOORELANDS will establish a procedure for processing any complaint about the personal information policy to ensure that all complaints are dealt with in an objective, fair and expeditious manner.

Approved by the Board of Directors