



## Privacy Policy

The Boys and Girls Clubs Foundation of South Coast BC (“BGC Foundation”) is committed to protecting the privacy of the personal information of its employees, volunteers, donors, and other stakeholders. We value the trust of those we deal with, and of the public, and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the information that you choose to share with us.

During the course of our activities, the BGC Foundation frequently gathers and uses personal information. Anyone from whom we collect such information should expect that it will be carefully protected and that any use of, or other dealing with, this information is subject to consent. The BGC Foundation’s privacy practices are designed to achieve this.

The BGC Foundation complies with the federal *Personal Information Protection and Electronic Documents Act* (PIPEDA) and the provincial *Personal Information Protection Act* (PIPA), and embraces the ethical guidelines established by the Association of Fundraising Professionals and Imagine Canada.

## Defining Personal Information

Personal information is any information that can be used to distinguish, identify, or contact a specific individual. This information can include an individual’s opinions or beliefs, as well as facts about, or related to, the individual. Exceptions: business contact information and certain publicly available information, such as names, addresses, and telephone numbers as published in telephone directories, are not considered personal information.

Information in the public domain is not subject to privacy legislation and as such is not included in this policy. Sources of public information include telephone and professional directories, newspapers, periodicals and public registries. Other circumstances in which consent is not required by law are set forth in PIPA, but do not represent common situations for the BGC Foundation.

Where individuals use their home contact information as business contact information, the BGC Foundation considers that the contact information provided is business contact information, and is not therefore subject to protection as personal information.

We consider donor and volunteer information always to be personal information, and do not disclose information about donors or volunteers without consent. Donors who request that their name and/or the amount of the gift not be publicly released shall remain anonymous.

## Principles

The BGC Foundation’s privacy policy adheres to the 10 principles of the Canadian Standards Association Model Privacy Code, as follows:

- 1. Accountability:** *An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.*

Accountability for the BGC Foundation's compliance with privacy legislation rests with the Director of Resource Development, who has been designated as the Foundation's Privacy Officer.

We are responsible for personal information in our possession, including information that has been transferred to a third party for processing. In cases where such transfers take place we ensure that the third party has comparable privacy safeguards in place.

**2. Identifying Purposes:** *The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.*

The purposes for which personal information is collected shall be identified by the BGC Foundation when or before the information is collected.

The purposes will be limited to those which are related to our business and which a reasonable person would consider to be appropriate in the circumstances. We collect personal information concerning our donors for the following reasons:

- To comply with CCRA requirements for gift processing
- To thank and publicly recognize donors
- To provide donors with information about how donated funds are used by Boys and Girls Clubs of South Coast BC
- To keep donors informed about the BGC Foundation's activities
- To promote opportunities for donors and potential donors to support the BGC Foundation
- To build and maintain relationships

The BGC Foundation will specify the identified purposes, orally or in writing, to the individual from whom personal information is being collected either at the time of collection or after collection but prior to use or disclosure. We will state the identified purposes in such a manner that an individual can reasonably understand how the information will be used or disclosed.

**3. Consent:** *The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except when inappropriate.*

The BGC Foundation will make a reasonable effort to ensure that individuals are aware of the purposes for which the information is collected at the time of collection.

An individual's consent is required regarding the collection and proposed use of personal information when the information is collected. Consent can be either expressed or implied and can be provided directly by the individual or by an authorized representative.

Express consent can be given:

- (a) in writing, such as when completing a donation or registration form
- (b) electronically, either by checking off a box on a response form or by contacting the BGC Foundation
- (c) orally, either in person or by telephone

Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

The manner in which the BGC Foundation obtains consent for the collection of personal information varies with the sensitivity of the information being collected. Because of the nature of the information we collect, in most cases we will obtain implied consent at the time of collection.

Individuals may withdraw consent at any time, by any means, with reasonable notice to the BGC Foundation.

An individual's consent is required before confidential information is released to outside parties.

- 4. Limiting Collection:** *The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.*

The BGC Foundation will not collect information indiscriminately. We will specify the types of information collected, limited to that which is necessary and reasonable to our programs and fundraising efforts. The BGC Foundation will collect personal information by lawful means and will not mislead individuals about the purposes for which information is being collected.

The BGC Foundation shall not make unwarranted or intrusive inquiries into a donor or prospect's gift history or personal life. The BGC Foundation attributes all data that it collects.

- 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 individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.*

When the BGC Foundation uses personal information for purposes other than those given at the time of collection, consent will be obtained for these purposes.

The BGC Foundation does not sell, rent or trade mailing lists. Personal information is only disclosed to third parties who have signed an agreement binding them to the BGC Foundation's privacy policies.

Personal information will be retained as long as the purpose for which the information was originally collected remains valid.

- 6. Accuracy:** *Personal information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.*

The BGC Foundation will use its best efforts to ensure that personal information that is used on an ongoing basis, including information that is disclosed to third parties, and information that is used to make a decision about an individual (such as a giving recognition category), is accurate, complete, and up to date.

Donors are encouraged to review, correct, and update personal information.

- 7. Safeguards:** *Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.*

Personal information gathered by the BGC Foundation shall be kept in confidence. BGC Foundation personnel shall be authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained.

Appropriate physical and electronic measures shall be used to ensure that personal information is secure. Access to donor and volunteer records shall be limited to those who require such information to fulfil their job responsibilities. Special protection shall be given to all records pertaining to anonymous donors. The confidentiality of donor and volunteer records shall continue after the relationship with the individual has ended.

The BGC Foundation's safeguards will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which the information is held.

We will make our employees aware of the importance of maintaining the confidentiality of personal information, and we will exercise care in the disposal and destruction of personal information to prevent unauthorized parties from gaining access to it. All employees and volunteers having access to personal information are required to sign an oath of confidentiality.

Our methods of protection will include physical measures (e.g., locked filing cabinets, restricted access to offices), organizational measures (e.g., security clearances and limiting access on a "need-to-know" basis), and technological measures (e.g., the use of passwords and encryption).

Third parties are expected to safeguard personal information entrusted to them in a manner consistent with the policies of the BGC Foundation, and are required to sign a confidentiality agreement as part of all contracts. Examples of third parties include mailing services and data analysis providers.

**8. Openness:** *An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.*

The BGC Foundation will be open about privacy policies and procedures with respect to the management of personal information and will make them readily available in a form that is generally understandable. The information made available will include:

- (a) the name or title and contact information of the Privacy Officer who is accountable for compliance with the BGC Foundation's policies and procedures, and to whom complaints or inquiries can be forwarded
- (b) the means of gaining access to personal information held by the BGC Foundation
- (c) a description of the types of personal information held by the BGC Foundation
- (d) a copy of any document that explains the BGC Foundation's policies, procedures, standards, or codes
- (e) the types of information made available to third parties

**9. Individual Access:** *Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.*

Upon request, individuals will be given access to the information in their donor record.

The BGC Foundation will respond to an individual's request within a reasonable length of time, but no longer than one month. While our response will typically be provided at no cost to the individual, depending on the nature and amount of information involved, we reserve the right to impose a cost.

The requested information will be made available in a form that is generally understandable. For example, where the BGC Foundation uses abbreviations or codes to record information, an explanation of those codes will be provided. Where possible, we will provide sources for the information.

For the BGC Foundation to provide an account of the existence, use, and disclosure of personal information, an individual may be asked to provide additional information to aid in the search. The additional information provided will only be used for this purpose.

Upon request, the BGC Foundation will provide specific information about third parties to whom personal information has been disclosed.

**10. Challenging Compliance:** *An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.*

The name of the Privacy Officer will be known to staff. Information on how to contact the Privacy Officer will be identified to other individuals periodically.

The BGC Foundation will maintain procedures to receive and respond to complaints or inquiries about its policies and practices relating to the handling of personal information. The complaint procedures will be easily accessible and simple to use.

Individuals who make inquiries or lodge complaints will be informed by the BGC Foundation of the existence of relevant complaint procedures.

If a complaint is found to be justified, the BGC Foundation will take appropriate measures, including revision of the personal information and, if necessary, amendment of the BGC Foundation's policies and practices.

## Updating of Privacy Policy

We regularly review and update our privacy policy. Please reference this web site for our most current privacy practices.

## How to Contact the Privacy Officer

Inquiries, complaints or access requests should be addressed to: Privacy Officer, BGC Foundation of South Coast BC, Vancouver, BC V5T 3R8. E-mail: [mmark@bgcbc.ca](mailto:mmark@bgcbc.ca).

## Online Security

When you make a donation to the BGC Foundation online, a secure connection is established and your information is encrypted to prevent interception during the transaction. This secure connection is maintained until the transaction is completed or terminated. The software that enables these processes is routinely updated to maximize protection of your information.

If you provide us with your postal address, email address, or telephone number, you may receive periodic communication regarding the BGC Foundation's services or upcoming events, or responding to any request you may have made.

If you prefer not to be contacted by the BGC Foundation please let us know by sending an email to [mmark@bgcbc.ca](mailto:mmark@bgcbc.ca) or by calling 604-879-6554. Our website may contain links to websites of other organizations that maintain their own privacy and security policies. This policy describes the privacy practices of the BGC Foundation site only.

## Cookies

The BGC Foundation's website uses persistent cookies within visiting browsers to enable the functions of the website and for tracking performance. Specifically, cookies are used the following ways:

- Preserving and expiring visitor sessions on the site (e.g., preserving data between steps of a process, and ending the session after a period of inactivity)
- Storing font size preferences on the site
- Enabling web analytic tools (such as Google Analytics, Clicktale, and iPerceptions – see below)

Cookies are used anonymously and without storing Personally Identifiable Information (PII). Visitors that wish to opt-out of cookies should review the help documentation for their browser software to decline or selectively decline cookies. Note that declining cookies may adversely impact site performance.

### **Google Analytics**

The BGC Foundation website uses Google Analytics to track performance. Google Analytics uses persistent cookies to track visitor sessions, visitors across multiple sessions, and referral sources to our sites. We also track the performance of promotional links to our site using Google Analytics. In compliance with the Google Analytics Terms of Service, at no time is personally identifiable information (PII) passed to Google Analytics. Note that Google Analytics stores its data within the United States of America and is subject to US laws. We use this data to understand site performance to serve you better. Those wishing to opt out of Google Analytics data collection should use the Google Analytics Opt-out Browser Add-on.

For more information about our online security practices, contact [mmark@bgcbc.ca](mailto:mmark@bgcbc.ca).

Further information on privacy and your rights in regard to your personal information may be found on the website of the Privacy Commissioner of Canada at [www.priv.gc.ca](http://www.priv.gc.ca).