

## **PROTECTION OF PRIVACY POLICY**

### **POLICY:**

#### **Collection of Personal Information**

Habitat 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 your financial support. We may contact you to inform you of and to request your support for our future endeavors because you 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, 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, 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 volunteers 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 your consent for the new use, unless otherwise permitted by law.
- 1.8 You may direct any questions concerning the collection, the use which will be made of the information, the categories of person 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.

#### **Obtaining Consent**

Habitat is committed to obtaining your consent for the collection of your 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 you 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 you to consent to the collection, use or disclosure of personal information beyond that required to provide the product or service.
- 2.3 We collect your 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 your reasonable expectations.

2.5 You may withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting our Privacy Officer. Please note that the withdrawal of your consent may impact on our ability to serve you and to maintain our relationship.

Note: In certain circumstances personal information can be collected, used or disclosed without your 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 you were 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 you. 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 your consent before disclosing personal information. Finally, we may collect information without your consent if the collection is reasonable for the purposes of establishing, managing or terminating an employment or volunteer relationship.

### **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 your 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.

### **Protection Of Personal Information**

Habitat is committed to protecting your 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.

### **Retention Of Personal Information**

Habitat is committed to retaining your 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 about you 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 you 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 allow you to exhaust any recourse that you may have 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.

### **Access To Personal Information**

Upon receipt of a written request, Habitat will inform you of the existence, use and disclosure of your personal information and will give you access to that information. You will be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

6.1 Upon receipt of your written request, we will provide an account of the use that has been made or is being made of your 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 your personal information, we will provide a list of organizations to which we may have disclosed your personal information.

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

6.3 If you need assistance in preparing your written request, we will assist you.

6.4 Within 30 days after receipt of your written request, we will either respond to your query or send you a notice of extension, advising you of the new time limit, the reasons for extending the time limit and your right 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 your written request at no or minimal cost to you. If there is a cost involved for the transcription, reproduction or transmission of your personal information, we will inform you of the approximate cost beforehand and will only proceed if you have 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 about you. 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 you with access to the remaining information.

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

### **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 about you.

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 you to do so. If you are aware of changes to the personal information you have given us, simply write our Privacy Officer and we will update our records accordingly.

7.2 When the accuracy or completeness of your personal information is successfully challenged, we will amend your 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 your file. Where appropriate, the existence of the unresolved challenge will be transmitted to third parties having access to the information in question.

### **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 GREY BRUCE  
2230107 Grey Road 17  
Owen Sound, Ontario  
N4K 5N7  
Or by e-mail at [info@habitatgreybruce.ca](mailto:info@habitatgreybruce.ca)