

# Habitat for Humanity Grey Bruce Protection of Privacy Policy

## INTENT

To protect the personal privacy of the affiliate's members, volunteers, families and staff in accordance with applicable provincial and federal statutes.

## POLICY

Habitat for Humanity Grey Bruce (HFHGB) is dedicated to protecting the privacy of everyone who engages with us and maintaining their trust placed in our Affiliate. As such, our privacy policy (the "Privacy Policy") incorporates the standards set out in applicable federal and provincial privacy legislation across Canada. It is expected that every employee and volunteer who is tasked with handling private information will be familiar with the policy and will commit to protecting the privacy of personal information from all sources.

### A. Collection of Personal Information

HFHGB generally collects personal information as necessary to administer our programs and services, including as described below:

- 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 unless you ask us not to.
- 1.2 We 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 an applicant qualifies as a prospective homeowner. The family selection information assesses credit-worthiness, need, stability of relationships, steady income, willingness and ability to partner with HFHGB.
- 1.3 We may collect family and neighborhood statistics to raise awareness of and increase potential for fundraising and new family applicants.
- 1.4 We may collect your name, mailing address and email address in order to send you newsletters that you have signed up for.
- 1.5 We may collect other personal information with your consent or as permitted or required by law.

### B. Disclosure of Personal Information

HFHGB may disclose or transfer personal information as necessary in order to administer its programs and services, including as described below:

- 2.1 We may transfer personal information to our service providers who need access to personal information to carry out their work for us, including to process donations, send communications, data hosting, data processing and information technology and other similar purposes. We use contractual or other means to require service providers to provide a level of security comparable to that provided under our Privacy Policy.
- 2.2 We may use and disclose personal information in connection with the proposed or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of our organization or assets, for the purposes of evaluating and/or performing the proposed transaction. Assignees or successors of HFHGB or our organization or assets may use and disclose your personal information for similar purposes as those described in this policy.

2.3 We may disclose personal information as necessary to meet legal, regulatory, insurance, audit and security requirements, or otherwise with your consent or as permitted or required by law.

### **C. Obtaining Consent**

HFHGB 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 or required by law.

3.1 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 including by explaining our personal information handling practices in this Privacy Policy.

3.2 Consent can be obtained in many ways. Consent can be express or implied. You may also provide your consent in some circumstances where notice has been provided to you about our intentions with respect to your personal information and you have not withdrawn your consent for an identified purpose, such as by using an "opt out" option provided, if any. In determining the appropriate form of consent, we will take into account the sensitivity of the personal information and the reasonable expectations of individuals with whom we deal with.

3.3 Generally, by providing us with personal information, we will assume that you consent to our collection, use and disclosure of such information for the purposes described in this Privacy Policy or otherwise at the time of collection. By providing us with personal information about another individual, you represent that you have consent from that person to provide his or her personal information to us.

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

3.5 In certain circumstances personal information can be collected, used or disclosed without your knowledge and consent. For example, to comply with a court order, local or federal regulations, or legally permitted inquiry by a government agency or to collect a debt owed to us. We may also collect, use and disclose information without your consent if it is reasonable for the purposes of establishing, managing or terminating an employment or volunteer relationship.

3.6 We may rely on third parties to obtain your consent to our collection, use and disclosure of personal information when we cannot seek consent directly from you. For example, seeking consent directly from you may not be possible when we 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 to us.

### **D. Protection of Personal Information**

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

4.1 We take reasonable steps to 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, including by using: (i) physical security measures, such as locked filing cabinets and restricted access to areas where personal information is stored; (ii) organizational security measures, such as employee training, security clearances and limiting access to a "need-to-know" basis; and (iii) technological security measures, such as passwords, encryption and virus protection, to prevent unauthorized access to personal information stored on computer systems.

4.2 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**

5.1 HFHGB 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.

5.2 We will retain personal information of applicants for homeownership for up to two (2) years.

**F. Access to and Correction of Personal Information**

6.1 HFHGB may establish and maintain a file of your personal information for the purposes described above, which will be accessible at the address listed below. Upon receipt of a written request, HFHGB will inform you of the existence, use and disclosure of your personal information and will give you access to that information, subject to applicable legal restrictions. You will also be able to challenge the accuracy and completeness of the information and have it amended as appropriate. In responding to your written request, we may require you to provide sufficient information to permit us to verify your identity before we provide an account of the existence, use and disclosure of your personal information, provide access to it, or make corrections. Please forward your request in writing to our Privacy Compliance Officer at the address set out below.

**G. Questions and Contact Information**

7.1 You may direct any questions or complaints concerning Habitat's handling of personal information to our Privacy Compliance Officer.

The Privacy Compliance Officer can be reached by regular mail at:

ATTENTION: Privacy Compliance Officer

HABITAT FOR HUMANITY GREY BRUCE

223017 Grey Road 17

Owen Sound, ON N4K 5N7

Or by e-mail at [info@habitatgreybruce.ca](mailto:info@habitatgreybruce.ca)

**H. Internet Usage**

8.1 When you visit HFHGB's website at [www.habitatgreybruce.ca](http://www.habitatgreybruce.ca) to obtain information about it, to research its products and services, or to use its on-line tools, please rest assured that we do not collect identifying information about you unless you specifically provide it. 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) which we use 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.

8.2 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 you have visited or customized, and make these pages readily accessible the next time you visit. If you do not want non-identifying information collected through the use of cookies, you can disable it by changing the setting of your Internet browser.

8.3 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, you 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.

8.4 Finally, please be advised that information voluntarily disclosed online in discussion areas and other public areas of our website or on HFHGB sponsored pages on social media sites can be collected, used and disclosed by third parties. Any submissions made to discussion areas or other public areas on our website or on HFHGB sponsored pages on social media sites 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.

#### **I. Changes to Privacy Policy**

Habitat reserves the right to modify our Privacy Policy at our sole discretion. In particular, the Privacy Compliance Officer will periodically review and modify our Privacy Policy in response to developments and changes in privacy law. If we intend to use or disclose personal information for purposes materially different than those described in this Privacy Policy, we will make reasonable efforts to notify affected individuals, if necessary, including by revising this Privacy Policy. Any modifications shall be effective immediately upon its publication by any means, including posting on this website. You agree to regularly review our Privacy Policy posted at this website, be aware of any modifications and be bound by the same.

26 October 2021