



# Policies and Procedures

## Privacy and Confidentiality Policy

The following are responsible for the development, review and oversight of this policy:

**Staff:** Executive Director  
**Board Position:** Chair -  
**Board Committee:** Governance and Administration

### Purpose

**Immigrants Working Centre (IWC)** is committed to safeguarding the personal information entrusted to us by our clients, donors, volunteers, and general public. We protect your personal information in accordance with *The Personal Information Protection and Electronic Documents Act*<sup>1</sup> (PIPEDA) and other applicable laws such as *The Canadian Anti-Spam Legislation*<sup>2</sup> (CASL). This policy outlines the principles and practices we follow in protecting your personal information. This policy applies to IWC and to any person providing services on our behalf. A copy of this policy is provided to any client, donor or other stakeholder upon request.

### Definitions

**Personal information:** Information about an identifiable individual. This includes an individual's name, home address and phone number, age, sex, marital or family status, immigration status, an identifying number, financial information, educational history, etc.

**Client:** Anyone that IWC comes into contact with including board members, volunteers, donors, clients and staff members.

### Procedural guidelines

#### WHAT PERSONAL INFORMATION DO WE COLLECT?

We collect only that personal information that we need for the purposes of providing services to our clients, including to:

- deliver requested programs and services
- enrol a client in a program
- send out fundraising materials

<sup>1</sup> <https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/>

<sup>2</sup> <https://laws-lois.justice.gc.ca/eng/acts/E-1.6/index.html>

- process donations and mail charitable tax receipts
- keep clients informed about our activities, services, and programs

We normally collect client personal information directly from our clients. We inform our clients, before, or at the time of collecting personal information, of the purposes for which we are collecting the information. The only time we don't provide this notification is when a client volunteers information for an obvious purpose (for example, producing a credit card donation when the information will be used only to process the payment).

We collect personal information over the phone, through the mail, in person, on paper and online. Hard copies are kept in locked offices and/or locked filing cabinets. Digital information is protected securely by IWC in conjunction with our IT provider.

### **CONSENT**

We ask for consent to collect, use or disclose client personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law. We may assume your consent in cases where you volunteer information for an obvious purpose. If we ask for consent in writing, this information will be filed in a secure location.

We assume your consent to continue to use and, where applicable, disclose personal information that we have already collected, for the purpose for which the information was collected. A client may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfil our legal obligations.

### **WEBSITE PRIVACY**

IWC only collects personal information upon your voluntary entry of this information on the website. Such instances include, but are not limited to entry of your email address into our "Join Our e-newsletter" subscription page, entry of your name, address, and email in our online application forms or credit card information in our online donation forms. All credit card information entered for donation purposes on our website is processed by PayPal, Inc. (or Stripe, Inc. or CanadaHelps.org) PayPal (or Stripe/Canada Helps) is a Level 1 Payment Card Industry (PCI DSS) certified company and ensures all transactions are handled with absolute security. This information is collected to enable the proper processing of donations and the entry of this information, along with your validation of the confirmation prompt, function as your consent for making the payment(s) indicated. PayPal/Stripe/Canada Helps payment does not sell any personal information that it collects.

### **Tracking Visits**

IWC may monitor traffic patterns, site usage and related site information in order to optimize our web site information and service or program offerings. IWC may track your visit in order to compile statistical information about the use of our Web site, but we do not collect individual information about you or your use of this site.

### **Subscription to Our E-Newsletter List**

Information you provide for subscription to our email list is used to keep you notified of IWC's ongoing activities, services, programs, and other relevant updates. In keeping with *the Canadian Anti-Spam Legislation* (CASL), the entry of this information functions as your consent for receiving the types of notifications listed. If at any time you wish to be removed from our email list, please click the "unsubscribe" button at the bottom of any of our subscription emails. If you are having issues with this button, please contact us. We will gladly accommodate your request.

### **Links to Other Websites**

Please note that our website includes links to other websites whose privacy policies we do not control. Once you leave our servers, use of any information you provide is governed by the privacy policy of the operator of the site you are visiting. That policy may differ from ours. If you cannot find the privacy policy of any of these sites via a link from the site's homepage, you should contact the site directly for more information. IWC is not responsible for the privacy practices or the content of such websites.

## **DATA USE AND DISCLOSURE**

We use and disclose client personal information only for the purpose for which the information was collected, except as authorized by law. For example, we may use client contact information to process donations, and send marketing materials and tax receipts. If we wish to use or disclose your personal information for any new purpose, we will ask for your consent. We will never share personal information with third parties.

Client information is kept within IWC's office. Individuals who wish to opt in or out of marketing campaigns, or correct personal information, are able to do so by contacting IWC.

## **ACCURACY OF PERSONAL INFORMATION**

We make every reasonable effort to ensure that personal information is accurate and complete. We rely on individuals to notify us if there is a change to their personal information that may affect their relationship with our organization. If you are aware of an error in our information about you, please let us know and we will correct it on request wherever possible. In some cases we may ask for a written request for correction.

We protect personal information in a manner appropriate for the sensitivity of the information. We make every reasonable effort to prevent any loss, misuse, disclosure or modification of personal information, as well as any unauthorized access to personal information. We use appropriate security measures when destroying personal information, including shredding paper records and permanently deleting electronic records.

## ACCESS TO PERSONAL INFORMATION

Individuals have a right to access their own personal information in a record that is in the custody of IWC, subject to some exceptions. If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

Personal information is usually only accessible to staff members and board members when it is necessary to their activities. Some volunteers have access to certain personal information. An example of this is a volunteer who enters contact information and donation information into IWC's database. Staff, board members and volunteers are required to sign a confidentiality agreement.

You may make a request for access to your personal information by writing to the Interim Executive Director, Elizabeth Webb at [ewebb@iwchamilton.ca](mailto:ewebb@iwchamilton.ca). You must provide sufficient information in your request to allow us to identify the information you are seeking.

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization. In addition, you may request a correction of an error or omission in your personal information.

## CONTACT US WITH QUESTIONS, CONCERNS OR COMPLAINTS

If you have any questions, concerns or complaints regarding this policy, please do not hesitate to contact IWC at (905) 529-5209 or [communications@iwchamilton.ca](mailto:communications@iwchamilton.ca). If your questions, concerns or complaints cannot be dealt with immediately, they will be recorded and sent to the appropriate person/people in our organization to consider. We promise to respond within 2 weeks of your communication with us.

## INFORMATION ABOUT THIS POLICY

**Original Effective Date:**

**Last Update Date:** February 2020

**Approved by Executive Director:**

**Review Period:** Every 2 years

**Date of Next Update:** February 2022