



## **Fundraising Privacy Policy**

### **Feb, 2018**

The Edmonton Humane Society (the "Society") is committed to protecting the privacy of our donors. We value our donors' trust and recognize that maintaining this trust requires that we be open and accountable in our collection, use and disclosure of our Donors' Personal Information and Confidential Information.

#### **1.0 Definitions**

##### **1.1 Donor**

"Donor" means a person, company or organization that provides a voluntary transfer of property to the Society normally in the form of cash, cheque, credit card or publicly traded stocks or securities and where no advantage is accrued to the donor.

##### **1.2 Constituent**

"Constituent" or "Constituents" means the Society's staff members, volunteers, Trustees, Board members and Donors.

##### **1.3 Personal Information**

"Personal Information" means information that can be used to distinguish, identify or contact a Constituent and includes a Constituent's credit card or banking information. Personal Information also includes information with respect to an individual's status as a Donor to the Society and the amount(s) an individual has donated or plans to donate to the Society.

##### **1.4 Privacy Coordinator**

"Privacy Coordinator" means the officer designated by the Society from time to time as primarily responsible for the Society's collection, use and disclosure of Personal Information and Confidential Information, including compliance with privacy legislation. The Privacy Coordinator acts as the point of contact for all privacy questions and issues.

##### **1.5 Cookies**

"Cookie" or "Cookies" means small data file(s) created by a web server and stored on a user's computer. Cookies let websites identify users, keep track of users' preferences and recognize users who are returning to the website. Cookies also let websites make custom pages for users. Some Cookies may also keep personal information, such as site passwords and account numbers. Web browsers may permit a user to accept or refuse all Cookies, third-party Cookies, or Cookies from certain websites.

#### **2.0 Accountability for Personal Information**

The Society collects and stores Personal Information in strict confidence. The Society's Constituents (other than donors) are required to sign confidentiality agreements so that safeguards are in place to ensure that Personal Information is not accessed, disclosed or shared more widely than is necessary to achieve the purpose for which it was collected. The Society also takes measures to ensure that the integrity of Personal information is maintained and to prevent it from being lost or destroyed.

Where the Society chooses to retain a third party service provider to conduct activities on the Society's behalf (including, but not limited to, fundraising, database creation and processing services), the selection of such third party service provider is made with a view to professionalism and the protection of Personal Information. The Society takes all reasonable precautions to ensure that third party service providers are compliant with applicable privacy legislation [for example, Canadian Anti-Spam Legislation (CASL), Freedom of Information and Protection of Privacy Act (FOIPPA), the Payment Card Industry Data Security Standard (PCIDSS)] in order to protect Personal Information.

#### Canadian Anti-Spam Legislation

Effective July 1, 2014, Canada's Anti-Spam Legislation came into effect. For charitable organizations, there is implied consent for a period of 24 months with existing donors, volunteers and participants.

Constituents who have not been active with the Society for more than two years will automatically stop receiving non-donation related communication from the Society. To request to be added or dropped from the Society's communication list, a Constituent may email [giving@edmontonhumanesociety.com](mailto:giving@edmontonhumanesociety.com) or call 780-491-3507. A Constituent may also unsubscribe at any time by clicking the "unsubscribe" link at the bottom of all Society emails. Please note that Canada's Anti-Spam Legislation deems a person to have expressly consented to the installation of a computer program when that computer program is a Cookie. In the result, the Society is permitted to use Cookies unless and until the person on whose computer system Cookies have been installed withdraws the consent to the installation of such Cookies.

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

#### 3.1 Purpose of Collection of Personal Information

When the Society collects Personal Information directly from a Constituent, the Society identifies the purposes for which it is collected at or before the time of collection. These purposes include: registration, fundraising, the administration of the donations, providing information about the activities of the Society and the Edmonton Humane Society, and compliance with legal and regulatory requirements. Personal Information will be collected only by fair and lawful means.

#### 3.2 Consent to Collect, Use or Disclose Personal Information

The Society collects, uses and discloses Personal Information with Constituent permission. Permission may be expressed orally, in writing or may be implied, and collected orally, electronically or in writing.

A Constituent may limit or opt-out of future contact by the Society. It is clearly indicated how to do so on all electronic communications from the Society and on the Society's website.

A Constituent has the right at any time to withdraw consent to the use of Personal Information.

#### 3.3 Limit of 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 consent or as required by law. Personal Information will be retained only as long as necessary for the fulfillment of those purposes. The Society does not trade, rent or sell any Personal Information to third parties.

#### **4.0 Online Collection of Personal Information**

The Society's web pages contain online forms that allow visitors to make donations. The Personal Information provided on these forms is used only to process these donations. Credit card numbers and banking information, as applicable, are encrypted using Blackbaud certificate for the protection of a Donor's Personal Information and not held in hard copy.

Visitors to the Society's web pages are not required to disclose Personal Information as a condition of using such web pages. When a visitor uses the Society's web pages, data about such use is stored on third party servers. This data may include the name of the visitor's internet service provider, the web site used to link to the Society's web pages, the web sites that were visited from the Society's web pages and the visitor's IP-Address. The Society uses such data to administer the web pages more effectively, and to gather broad demographic information about what countries and domains visitors come from and their behavior on the Society's web pages.

##### **Remarketing**

The Society's website uses Google AdWords remarketing services to advertise on third-party websites, including Google, to its previous visitors. This includes advertisements on the Google search results page and in the Google Display Network.

Third-party vendors, including Google, use Cookies to serve advertisements based on a visitor's previous visits to the Society's web pages. Any data logged will be used in accordance with this policy as well as Google's applicable policies.

The Society respects its Constituents' right to privacy and their decision to choose whether or not to share their information. Constituents may opt-out of Google's use of Cookies by visiting Google's Ads Settings or Network Advertising Initiative opt-out page.

#### **5.0 Safeguarding Personal Information**

Personal Information is protected with security safeguards appropriate to the sensitivity of the information. The Society uses password protocols and secure websites to protect Personal Information. The Society's digital security software is routinely updated for the protection of Personal Information.

Personal Information held in hard copy, such as original gift agreements, are secured within the Society's premises.

#### **6.0 Accuracy of Personal Information**

The Society relies on Constituents to provide accurate Personal Information. The Society strives to ensure that accuracy is maintained in all applicable Constituent databases. A Constituent may access his or her Personal Information to change or modify Personal Information for accuracy.

## **7.0 Transparency Regarding Privacy Practices and Personal Information**

The Society's practices relating to the management of Personal Information are available to all Constituents on the Society's web pages. Constituents who do not have access to electronic media may contact the Society to request a print version of this Policy.

Any person who is not a Constituent may inquire with the Society whether the Society holds any Personal Information with respect to that person. The Society's Privacy Coordinator shall respond to all such inquiries and take steps in accordance with this Policy.

Any concerns about the Society's compliance with this Policy and privacy legislation in general may be directed to the Society's Privacy Coordinator. The Society will investigate all complaints, acting reasonably. In the event that a complaint identifies compliance issues, the Society shall take appropriate steps to achieve compliance, acting reasonably.