

EDMONTON HUMANE SOCIETY PRIVACY POLICY

1.0 PURPOSE

The purpose of this Privacy Policy is to describe the different types of Personal Information the Edmonton Humane Society (EHS) handles and EHS's privacy practices with respect to such Personal Information.

This Privacy Policy is intended to ensure that employees, clients, volunteers, donors, contractors, visitors to the EHS website, and any other person that may utilize EHS's services understands how we treat all Personal Information that may be collected when using our services and our website, and when working with us.

2.0 SCOPE

This Privacy Policy establishes EHS's policies and procedures with respect to all Personal Information collected, used and disclosed by EHS. This Privacy Policy applies to EHS and any person providing services on our behalf. More specifically, this Privacy Policy applies to all the Personal Information collected, used and/or disclosed by EHS respecting employees, clients, volunteers, donors, contractors, any person that accesses EHS's website, and any other person that utilizes any services provided by EHS.

The EHS website may contain links to third party websites, applications and services. The information practices or the content of such other websites are governed by the privacy statements and policies of those websites. EHS encourages you to review the privacy statements and policies of those websites to understand their information practices.

A copy of this Privacy Policy is available on EHS's website and may be provided to any person on request. This Privacy Policy outlines the principles and practices we follow in protecting your Personal Information.

3.0 POLICY

EHS is committed to safeguarding the Personal Information of employees, clients, volunteers, donors, contractors, visitors to EHS's website, and any other person that may utilize EHS's services. We manage your Personal Information in accordance with Alberta's Personal Information Protection Act and other applicable laws.

3.1 What is Personal Information?

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

3.2 What Personal Information do we collect and how do we collect it?

EHS only collects the amount and type of Personal Information that is necessary for the purposes of which the Personal Information is collected.

EHS normally only collects Personal Information about you directly from you. However, EHS may collect your Personal Information from other persons with your consent or as authorized by law.

We will inform you, before or at the time of collecting Personal Information, of the purposes for which we are collecting your Personal Information. We will inform you of any new purpose for which your Personal Information will be used or disclosed, if the purpose changes from the time of initial collection, and seek your consent for such use or disclosure. The only time EHS will not provide this notification is when Personal Information is voluntarily provided for an obvious purpose (for example, producing a credit card to pay a membership fee when the information will be used only to process the payment).

In addition, EHS's website uses Google AdWords remarketing services to advertise on third-party websites, including Google, to individuals that have previously visited the EHS website. 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 EHS's website.

What follows is the type of Personal Information that we may collect, depending on your relationship with EHS and how you use our services. These are general examples to help you understand the type of Personal Information EHS collects. This list is not intended to limit the types of information EHS may collect.

a. Personal Information of Clients

The following list includes, but is not limited to, the Personal Information that may be collected by EHS respecting clients:

- contact information, including name, home address, telephone number, and email address; and
- credit card or other financial information.

Personal Information is collected from clients for purposes of:

- delivery of requested products and services;
- enrollment in a program or course;
- sending out association membership information; and
- if the client has adopted an animal(s), sharing information with the City of Edmonton to confirm the licensing of the adopted animal(s).

b. Personal Information of Donors

The following list includes, but is not limited to, the Personal Information that may be collected by EHS respecting donors:

- contact information, including name, home address, telephone number, and email address; and
- credit card, banking or other financial information.

Personal Information is collected from donors for purposes of:

- facilitating the making of donations, gifts and bequeaths;
- registration;
- fundraising and marketing;
- providing information about the activities of EHS; and
- compliance with legal and regulatory requirements.

c. Personal Information of Employees, Volunteers and Contractors

The following list includes, but is not limited to, the Personal Information that may be collected by EHS respecting employees, volunteers and contractors:

- contact information, including name, home address, telephone number, and email address;
- social insurance number (for paid employees only);
- criminal background checks;
- checks of whether the individual has ever been convicted of an offence under the *Animal Protection Act*;
- employment or volunteer information, including resume (which may include educational background, work history, and references), reference information and interview notes, letters of offer and acceptance of employment, policy acknowledgment forms, background verification information, workplace performance evaluations, emergency contacts, etc.;
- benefit information, including forms relating to applications or changes to health and insurance benefits including medical and dental care, life insurance, short and long-term disability (for paid employees only); and

- financial information, including pay cheque deposit information and tax-related information (for paid employees only).

Personal Information of employees and volunteers is collected for purposes of establishing, managing or terminating an employment or volunteer work relationship, including:

- determining eligibility for employment or volunteer work, including verifying qualifications and references;
- establishing training and development requirements;
- assessing performance and managing performance issues, when they arise;
- administering pay and benefits (paid employees only);
- processing employee work-related claims (e.g. benefits, workers' compensation, insurance claims) (paid employees only);
- complying with requirements of funding bodies (e.g. grants); and
- complying with applicable laws (e.g. Canada Income Tax Act, Alberta Employment Standards Code).

d. Personal Information of Visitors to Website

Visitors to EHS's website might include clients, employees, volunteers, donors and other individuals. Visitors to EHS's website are not required to disclose Personal Information as a condition of using the web pages. When a visitor uses EHS's website, data about such use is stored on third party servers.

The following list includes, but is not limited to, the Personal Information that may be collected by EHS respecting visitors to the EHS website:

- the name of the visitor's internet service provider;
- the website used to link to EHS's website;
- the websites visited from EHS's website; and
- the visitor's IP address.

Personal Information of visitors to the EHS website is collected for purposes of:

- administering the EHS website more effectively; and
- gathering broad demographic information about what countries and domains visitors come from and their behavior on EHS's website.

3.3 Use of Service Providers Outside Canada

EHS uses services providers in the U.S.A. to store donor and adoption records and to store the Personal Information of donors of EHS and clients who adopt animals from EHS uses service providers in New Zealand to store the Personal Information of clients who adopt animals from EHS.

EHS will before or at the time of collecting or transferring the information to service providers outside of Canada, notify you of:

- the way in which you may obtain access to written information about EHS's policies and practices with respect to service providers outside Canada, and
- the name or position name or title of a person who is able to answer on behalf of the organization the individual's questions about the collection, use, disclosure or storage of Personal Information by service providers outside Canada for or on behalf of the organization.

3.4 Consent

We ask for consent to collect, use or disclose the Personal Information of employees, clients, volunteers, donors, contractors, 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 (for example, paying for a service, registration for a program, adoption of an animal, etc.).

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.

Any visitor to the EHS website may opt-out of Google's use of Cookies by visiting Google's Ads settings or Network Advertising Initiative opt-out page.

We ask for your express consent for some purposes and may not be able to provide certain services if you are unwilling to provide consent to the collection, use or disclosure of certain Personal Information. Where express consent is needed, we will normally ask clients to provide their consent orally (in person or by telephone) or in writing (by signing a consent form).

3.5 Withdrawal of Consent

A person may withdraw or vary consent to the collection, use and disclosure of Personal Information at any time, upon reasonable notice to EHS, unless the Personal Information is necessary for us to fulfil our legal obligations.

Upon receipt of notice of your withdrawal of consent, we will inform you of the likely consequences of withdrawing or varying your consent, unless the likely consequences of withdrawing or varying your consent are reasonably obvious. We will respect your decision, but we may not be able to provide you with certain products and services if we do not have the necessary Personal Information.

3.6 How do we use and disclose Personal Information?

We use and disclose Personal Information only for the purposes for which the information was collected, except as authorized by law. For example, we may use client contact information to deliver goods.

If we wish to use or disclose your Personal Information for any new business purpose, we will ask for your consent. We may not seek consent if the law allows this (e.g. the law allows organizations to use Personal Information without consent for the purpose of collecting a debt).

As noted above, we may disclose the Personal Information of donors and clients who adopt pets from the EHS to third party agents or service providers to management certain records and to store the Personal Information.

The Personal Information of visitors to EHS's website may also be provided to third party agents or service providers for storage, and for purposes of facilitating advertising and collecting information respecting the visitor's use of EHS's website.

EHS does not trade, rent or sell any Personal Information to third parties.

3.7 What information do we provide for employment/volunteer references?

In some cases, after your employment or volunteer relationship with us ends, we will be contacted by other organizations and asked to provide a reference for you. It is our policy not to disclose Personal Information about our employees and volunteers to other organizations who request references without consent. Any request for reference for employment is referred to the Human Resources department.

The Personal Information we normally provide in a reference includes:

- confirmation that an individual was an employee or volunteer, including the position, and date range of the employment or volunteering; and
- general information about an individual's job duties and functions in the role.

3.8 How we safeguard Personal Information

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.

Specifically, access to systems, applications and the collected data is restricted to authorized personnel only. All EHS employees, volunteers, trustees, and board members 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. Further, EHS uses password protocols and secure websites to protect Personal Information. EHS's digital security software is routinely updated for the protection of Personal Information.

EHS's website contains online forms that allow visitors to make donations. Credit card numbers and banking information, as applicable, are encrypted using Blackbaud certificate for the protection of a donor's Personal Information and are not held in hard copy.

Personal Information stored in hard copy, such as original gift agreements, are secured within EHS's premises.

Where EHS chooses to retain third party service providers to conduct activities on behalf of EHS, the selection of such third-party service providers is made with a view to professionalism and the protection of Personal Information. EHS takes all reasonable precautions to ensure that third party service providers are compliant with applicable privacy legislation.

We use appropriate security measures when destroying Personal Information, including shredding paper records and permanently deleting electronic records.

We retain Personal Information only as long as is reasonable to fulfil the purposes for which the information was collected or for legal or business purposes.

We will notify the Office of the Information and Privacy Commissioner of Alberta, without delay, of any incident involving the loss of or unauthorized access to or

disclosure of Personal Information if it creates a real risk of significant harm to individuals as a result of the loss or unauthorized access or disclosure.

3.9 Requests for Correction of Personal Information

We make every reasonable effort to ensure that Personal Information is accurate and complete.

We ask individuals to notify us if there is a change to their Personal Information that may affect their relationship with EHS. 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.

The law permits individuals to submit written requests to us to correct errors or omissions in their Personal Information that is in our custody or control.

We will:

- correct the Personal Information and, if reasonable to do so, send correction notifications to any other organizations to whom we disclosed the incorrect information; or
- decide not to correct the Personal Information but annotate the Personal Information that a correction was requested but not made.

We will respond to your request within 45 calendar days, unless an extension is granted. We will not charge a fee for correcting Personal Information.

3.10 Access to records containing Personal Information

Individuals have a right to access their own Personal Information in a record that is in the custody or under the control of EHS, subject to some exceptions. For example, organizations are required under the Personal Information Protection Act to refuse to provide access to information that would reveal Personal Information about another individual.

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.

You may make a request for access to your Personal Information in writing to the Director, Human Resources and Workforce development, who is designated to ensure compliance with the *Personal Information Protection Act*. You must provide sufficient information in your request to allow us to identify the information you are seeking.

The Director, Human Resources and Workforce development can be contacted at:

Michele Boudreau Brochu, CPHR
780-229-2937
mbrochu@edmontonhumanesociety.com

You may also request information about our use of your Personal Information and any disclosure of that information to persons outside our organization.

We will respond to your request within 45 calendar days, unless an extension is granted in accordance with the *Personal Information Protection Act*. We may charge a reasonable fee to provide information. We will advise you of any fees that may apply before beginning to process your request.

We do not charge fees when the request is for personal employee information.

3.11 Communications Preferences and Choice

You may manage your receipt of marketing and non-transactional communications by following the “unsubscribe” instructions on all electronic communications from EHS and on EHS's website.

3.12 Questions and complaints

If you have a question or concern about any collection, use or disclosure of Personal Information by EHS, or about a request for access to your own Personal Information, please contact the Director, Human Resources and Workforce development, who is designated to ensure compliance with the *Personal Information Protection Act*. Our Director, Human Resources and Workforce development can be contacted at:

Michele Boudreau Brochu, CPHR
780-229-2937
mbrochu@edmontonhumanesociety.com

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta
#410, 9925 109 Street NW
Edmonton, AB T5K 2J8
Phone: 780-422-6860
Toll Free: 1-888-878-4044
Email: generalinfo@oipc.ab.ca
Website: www.oipc.ab.ca