



VICTORIA FOUNDATION

CONNECTING PEOPLE WHO CARE WITH CAUSES THAT MATTER®

PRIVACY POLICY

PREAMBLE

Victoria Foundation recognizes the value of its relationships with potential donors, existing donors, volunteers, and employees, and is committed to respecting and protecting their personal information. We value the trust of those we deal with, and of the public, and recognize that maintaining this trust requires transparency and accountability in our treatment of the personal information that is entrusted to us.

To ensure balance between an individual's right to protect his or her personal information and our need to collect, use or disclose personal information for reasonable business purposes, Victoria Foundation complies with British Columbia's *Personal Information Protection Act* (PIPA).

Since Canadian privacy legislation and PIPA are based on the 10 principles that comprise the Canadian Standards Association Model Privacy Code, our privacy policy adheres to these principles, as set forth in the policy below.

DEFINITION OF PERSONAL INFORMATION

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. Types of personal information collected and held by Victoria Foundation include: name; home address; phone numbers; email address; and, banking information.

POLICY

1. Accountability

An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.

Accountability for Victoria Foundation's compliance with privacy legislation rests with the designated Privacy Officer. The name and contact information of the Privacy Officer will be made available to individuals through the Victoria Foundation's website, its Privacy Statement or upon contacting the Victoria Foundation (see last page of this policy).

1. We are responsible for personal information in our possession, including information that has been transferred to a third party for processing. In cases where such transfers take place we ensure that the third party has comparable privacy safeguards in place.

2. Identifying Purposes

The purposes for which personal information is collected shall be identified by Victoria Foundation when or before the information is collected.

1. The purposes will be limited to those which are related to the Victoria Foundation's projects, programs and activities, which are reasonable and appropriate for the circumstances.

We collect personal information from our donors for the following reasons:

- to comply with CRA requirements for gift processing;
- to provide them with information about how donated funds are used by Victoria Foundation;
- to keep them informed about Victoria Foundation's activities;
- to promote opportunities to support Victoria Foundation;
- to determine donor motivation in creating a fund and to assist in making decisions about distributions from the fund; and
- to advise fund holders of donations made to the funds.

During the course of its various projects, programs and activities, the Victoria Foundation may also collect personal information from Board members, other volunteers and employees. The Victoria Foundation will specify the identified purposes, orally or in writing, to the individual from whom personal information is being collected either before or at the time of collection. We will state the identified purposes in such a manner that an individual can reasonably understand how the information will be used or disclosed.

3. Consent

The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except where inappropriate.

1. Victoria Foundation obtains meaningful consent for the personal information it collects.

The principle requires "knowledge and consent," and Victoria Foundation will ensure that individuals understand the nature, purpose and consequences of what they are consenting to at or before the time of collection. This includes providing key elements for individuals to quickly understand the impact of their privacy decisions and clear options to say yes or no. We will rely on implied consent only in strictly defined circumstances.

Individuals can give consent:

- in writing, such as when sending an email, completing an online donation form, completing the donation of securities form or signing a Fund Agreement;
- through an opt-in process, either by checking off a box on a response form or by contacting the Victoria Foundation directly; or
- orally, either in person or by telephone.

Individuals may withdraw their consent at any time, in writing, with reasonable notice to the Victoria Foundation. However, consent cannot be withdrawn retroactively.

2. Victoria Foundation may collect, use, and disclose personal information without consent if that information is considered by law to be in the public domain. Sources of public information include telephone and professional directories, newspapers, periodicals and public registries.

4. Limiting Collection

The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.

1. Victoria Foundation will determine the minimum amount of personal information that is necessary and reasonable to fulfill the purposes identified in point 2.1, and collect this limited personal information by lawful means. The Victoria Foundation will not intentionally mislead individuals about the purposes for which information is being collected.

Some of the types and means by which personal information is collected by Victoria Foundation include:

a. Information Collected Automatically from Victoria Foundation's Website:

For the purpose of compiling website statistics and understanding how to make our website more effective, we collect information through our website as follows:

- the Internet Protocol Address and domain name used. The Internet Protocol address is a numerical identifier assigned either to the donor's Internet service provider or directly to the donor's computer. This address can be translated to determine the domain name of the donor's service provider (e.g. victoriafoundation.bc.ca);
- the type of browser and operating system;
- the date and time of the visit; and
- the web pages or services accessed.

b. Information Collected Directly From an Individual:

The Victoria Foundation will collect and record personal information provided to us by an individual through our website, correspondence, conversations, meetings, conferences, donations, or other forms of communication.

c. Information Collected from Public Sources:

Consistent with the purposes identified in point 2.1, Victoria Foundation may collect personal information about an individual through public sources from time to time.

5. Limiting Use, Disclosure, and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfilment of those purposes.

- When Victoria Foundation would like to use personal information for purposes other than those given at the time of collection, consent will be obtained for new purposes.
- Personal information such as the name and address of the donor may be disclosed to a recipient organization or to a family member in accordance with the terms of the Foundation's Gift Acceptance and Disclosure Policy.
- Victoria Foundation will not disclose an individual's identity or personal information to third parties except in accordance with the terms of its privacy policies or unless required to do so as a part of an internal investigation or other law enforcement purpose, or as required by law.
- Personal information is disclosed only to third parties who have signed an agreement by which they agree to adhere to the terms of the Victoria Foundation's privacy policies.
- Victoria Foundation does not sell, rent, or trade mailing lists.
- Personal information will be retained for as long as the business purpose for which the information was originally collected remains valid or as required by law

6. Accuracy

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

- Victoria Foundation will use its best efforts to ensure that personal information in its custody and control is accurate, complete and up-to-date. This includes information that is used on an ongoing basis, is disclosed to third parties, and is used to make a decision about an individual (such as a giving recognition category).
- To request corrections to their personal information, individuals must notify Victoria Foundation in writing. Reasonable corrections will be made as soon as possible.

7. Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

- a. The Victoria Foundation is obligated to protect individuals' personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal. Security measures have been integrated into the day-to-day operating practices of Victoria Foundation.
- b. Through privacy training, we make our employees aware of the importance of maintaining the confidentiality of personal information, and we exercise care in the disposal and destruction of personal information to prevent unauthorized parties from gaining access to it. All employees and volunteers having access to personal information are required to sign a Confidentiality Agreement.
- c. Our methods of protection include physical safeguards (e.g. locked filing cabinets,), administrative safeguards (e.g. limiting access on a 'need-to-know' basis) and technological safeguards (e.g. the use of security passwords and encryption).
- d. Third parties are expected to safeguard personal information entrusted to them in a manner consistent with the policies of Victoria Foundation, and are required to sign a Confidentiality - Agreement as part of all contracts. Examples of third parties include mailing services and data analysis providers.

8. Openness

An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

- a. Victoria Foundation will be open about its privacy policies and procedures with respect to the management of personal information and will make them readily available and understandable.
- b. The information made available will include:
 - the name or title and contact information of the Privacy Officer who is accountable for compliance with Victoria Foundation's policies and procedures, and to whom complaints or inquiries can be forwarded;
 - purposes for collection;
 - a general description of the types of personal information held by Victoria Foundation;
 - a copy of any document that explains the Victoria Foundation's policies, procedures, standards or codes;
 - a general description of the types of personal information shared with third parties and who those third parties are; and,
 - risks of harm and other consequences related to collection, use, disclosure and storage of personal information by Victoria Foundation.

9. Individual Access

Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

- a. Individuals have the right to access and review their own personal information. An individual may also provide written permission to the Victoria Foundation to allow another individual to review his/her personal information, but only for that individual.

- b. To access personal information, a written request must be sent to Victoria Foundation's Privacy Officer. A response will be provided within a reasonable length of time, but no longer than one month from the date the request was received.
- c. For the Victoria Foundation to provide an account of the existence, use and disclosure of personal information, the requesting individual will be asked to provide proof of identity and may be asked to provide additional information to aid in the search. The additional information provided will only be used for this purpose.
- d. Upon request, Victoria Foundation will provide specific information about third parties to whom personal information has been disclosed unless prevented from doing so by the terms of any applicable confidentiality or non-disclosure agreements.
- e. The requested information will be made available in an understandable format. For example, where Victoria Foundation uses abbreviations or codes to record information, an explanation of those codes will be provided.
- f. While our responses are typically provided at no cost to the individual, depending on the nature and amount of information involved, we reserve the right to charge a reasonable fee to recover our costs. This fee will be estimated and provided for approval by the interested party before any work is undertaken.
- g. When an individual successfully demonstrates the inaccuracy or incompleteness of personal information in the control or custody of Victoria Foundation, the information will be amended as required. Where appropriate, the amended information will be transmitted to third parties having access to the information in question.

10. Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.

- a. The name of the Victoria Foundation's Privacy Officer will be known to staff and made available to the public on the website and on related documents.
- b. The Victoria Foundation will maintain procedures to receive and respond to complaints or inquiries about its policies and practices relating to the handling of personal information. The complaint procedures will be easily accessible and user-friendly.
- c. Individuals who make inquiries or lodge complaints will be given information by Victoria Foundation of the existence of relevant complaint procedures.
- d. If a complaint is found to be justified, the Victoria Foundation will take appropriate measures, including revision of the personal information, and, if necessary, amendment of Victoria Foundation's policies and practices.

How to Contact the Privacy Officer

Inquiries, complaints, or access requests should be addressed to:

Privacy Officer, Victoria Foundation
 200 – 703 Broughton Street, Victoria, BC V8W 1E2
 Email: privacy@victoriafoundation.bc.ca
 Phone: 250-381-5532 or Fax: 250-480-1129.

If a complainant is unsatisfied with the response from Victoria Foundation's Privacy Officer, within 30 days of receiving the response he/she may ask for a review or make a complaint by writing to the Office of the Information & Privacy Commissioner for British Columbia.

Office of the Information and Privacy Commissioner for British Columbia

Email: info@oipc.bc.ca

Mail: PO Box 9038 Stn. Prov. Govt.

Victoria BC V8W 9A4

If you are unable to submit a written complaint, the Commissioner's office can be reached:

Telephone: 250-387-5629

Callers outside Victoria can call toll-free by calling Enquiry BC and requesting a transfer to 250-387-5629

Enquiry BC: Vancouver 604-660-2421, elsewhere in BC: 1-800-663-7867

[Information about the OIPC complaint process](#)

Policy Review

This Policy will be reviewed at least every three years, or as required in order to ensure compliance with changes in law, by the Governance and Nominating Committee, with revisions to be approved by the Board of Directors

VICTORIA FOUNDATION PRIVACY POLICY	
Initial Board Approval:	June 28, 2013
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