



FOOD FOR LIFE CANADA CHARITABLE CORPORATION

POLICY CATEGORY	BOARD GOVERNANCE
POLICY NUMBER	BG12
TITLE OF POLICY	PRIVACY POLICY
APPROVED BY	BOARD
DATE OF APPROVAL	NOVEMBER 14 th , 2012
REVISION DATE	NOVEMBER, 2015

Purpose of Policy

From time to time during the course of its activities, Food for Life Charitable Corporation (“FFL”) collects, uses and discloses personal information of its employees, volunteers, members, donors and other stakeholders. The purpose of this policy is to ensure that the privacy and confidentiality of any such information is maintained and that such information is used only for the purposes for which it was collected.

Guiding Principles

- FFL is committed to protecting the privacy of the personal information of its employees, volunteers, members, donors and other stakeholders.
- FFL values the trust of those with whom we deal, and of the public, and recognizes that maintaining this trust requires that we be transparent and accountable in how we treat personal information that is shared with us.
- Anyone from whom we collect personal information should expect that it will be carefully protected and that any use of this information beyond the purpose for which it was collected is subject to consent.

What Constitutes “Personal Information”?

Personal information is any information that can be used to distinguish, identify or contact a specific individual. During the course of our relationship we may collect certain personal information such as names, street and email addresses, phone and fax numbers, social insurance numbers and credit card information. We may also have a record of donations and attendance at FFL events. However, business contact information and certain publicly available information such as names, addresses and

telephone numbers as published in telephone directories are not considered personal information.

Where an individual uses his or her home contact information as business contact information as well, FFL considers that the contact information provided is business contact information, and is not therefore subject to protection as personal information.

Privacy Practices

FFL collects, uses and discloses personal information only for purposes that a reasonable person would consider appropriate in light of the circumstances. These purposes include, but are not limited to:

- Providing services in accordance with FFL's mission statement.
- Raising funds for FFL.
- Providing compensation and benefits to employees.
- Managing and developing our businesses and operations, including personnel and employment matters.
- Satisfying legal and regulatory requirements.

Personal information gathered by FFL will be maintained in confidence. FFL personnel are authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained.

FFL will not sell, exchange, or trade personal information or lists nor will we provide or share personal information with third parties unless:

- Written authorization is provided to share the information.
- Sharing the information is necessary to process a donation, for example, to process a credit card transaction.
- The release of such information is otherwise required by law.

Safeguards will be taken to ensure that the information is not disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered. We also take measures to ensure the integrity of this information is maintained and to prevent it from being lost, stolen or destroyed.

We will use our best efforts to ensure that personal information is as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

Website and Electronic Commerce

FFL uses services requiring password protocols and encryption software to protect personal and other information we receive when processing a donation or other payment on-line. All such third party service providers must be in compliance with PIPEDA and have an established and published privacy policy available for all users.

Acknowledgements

Donor and volunteer information will not be published in recognition material without prior written consent.

Updating of Privacy Policy

FFL is committed to regularly reviewing its privacy practices. Any revisions or additions to this policy will be made available on our website.

Contact Information

Question, concerns or complaints relating to FFL's privacy policy and practices and individuals wishing to review information which is maintained in their active files should direct their request to our Executive Director at 905-510-5724 or 905-635-1106 or by e-mail at exdir@foodforlife.ca.

Further information on privacy and your rights in regard to your personal information may be found on the website of the Privacy Commissioner of Canada at www.privcom.gc.ca.