

SQUAMISH COMMUNITY FOUNDATION PRIVACY AND CONFIDENTIALITY POLICY

BOARD APPROVAL DATE	March 8, 2022
DATE OF LAST REVIEW	January/February 2022
REVISED AND APPROVED	June 9, 2026

Our Commitment to Privacy Summary

The Squamish Community Foundation (“we”, “our”, “us”) is committed to protecting the privacy of the information of its employees, members, donors, individuals and other stakeholders and safeguarding personal information. We value the trust of those we deal with, and of the public, and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the information that donors choose to share with us. During the course of our various projects and activities, we frequently gather and use personal information. Anyone from whom we collect such information should expect that it will be carefully protected and that any use of this information is subject to consent. This policy is posted on the foundation’s website.

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, the Squamish Community Foundation complies with British Columbia’s *Personal Information Protection Act* (PIPA).

Part 1: Definitions

1. **Personal Information.** Personal information is any information that can be used to distinguish, identify or contact a specific individual. This information can include an individual’s opinions or beliefs, as well as facts about, or related to, the individual. Exceptions: business contact information and certain publicly available information, such as names, addresses, email addresses and telephone numbers as published in public directories, are not considered personal information. Where an individual uses his or her home contact information as business contact information as well, we consider that the contact information provided as business contact information.
2. **People** means grant applicants, members, donors, volunteers, employees and stakeholders.
3. **Foundation** means the Squamish Community Foundation
4. A **member** is an individual as defined in the Society’s Bylaws.
5. An **employee** includes a volunteer, a person providing services under contract or a person entitled to wages for work performed.

6. A **donor** is a person, group or organization that provides monetary or in-kind support to the Society
7. A **stakeholder** is any individual, group or organization that may have an interest in or is impacted by the work of the Society.
8. **Sensitive Personal Information** Is Personal Information that, if lost, compromised or disclosed could result in substantial harm, embarrassment, inconvenience or unfairness to an individual. Sensitive Personal Information generally includes health-related information, data revealing racial or ethnic origin, financial information, political opinions, religious or philosophical beliefs, genetic or biometric data, and information concerning a person's sex life or sexual orientation. Depending on the context, otherwise non-sensitive personal information may become sensitive.
9. **Meaningful consent** means that an individual understands the purpose, nature, use, and consequences of providing their Personal Information. This information must be clearly explained and made easily accessible to the person giving consent.
10. **Express Consent** occurs when an individual willingly agrees to the collection, use and disclosure of their Personal Information either verbally or in writing.
11. **Deemed Consent** occurs when an individual volunteers information for an obvious purpose that a reasonable person would consider appropriate in the circumstances. Deemed consent is only appropriate to use in circumstances where those purposes are considered so obvious that notification is unnecessary.
12. **Use of Personal Information** means using the information internally to provide an individual with a service or benefit, or to otherwise comply with the law.
13. **Disclosing Personal Information** means showing, sending or giving an organization, government or individual access to the personal information in question.
14. **Privacy Officer** means one or more designated individuals within the Foundation who functions as the first point of contact when privacy issues arise and has the authority to intervene on privacy issues. The Privacy Officer is responsible for developing, implementing and maintaining a privacy policy; conducting a privacy audit and self-assessment; managing privacy training; responding to requests for access to and correction of personal information; and working with the Information and Privacy Commissioner in the event of an investigation.

Part 2: General Confidentiality

15. The Foundation is responsible for personal information under its control and must have policies and procedures that protect personal information. The Foundation must identify the reasonable purposes for which the collection, use, and disclosure of personal information is required.
16. The foundation collects personal information from members, directors, donors, volunteers, grant recipients, contractors and others.

17. The Foundation recognizes that not only does it have legal responsibilities with respect to the collection, use, protection, and disclosure of personal information, but also an imperative to protect the relationship of trust with those from whom we collect personal information.
18. The Board and all its committees act as a whole. Deliberations including the opinions of individual Board and committee members will be kept confidential. Board members are required to hold in the strictest confidence all matters dealt with by the Board during in-camera meetings and matters related to personnel and property.

Part 3: What Information We Collect

19. Information can be collected through a variety of methods including, phone, email, online, and in person when you:
 - a. Make a donation
 - b. Subscribe to our newsletter
 - c. Apply for a grant
 - d. Register for an event
 - e. Contact us through our website
 - f. Engage with us on Social Media
20. This information may include:
 - a. Name
 - b. Email Address
 - c. Mailing Address
 - d. Phone Number
 - e. Donation Details
 - f. Payment information
 - g. Organizational details (from grant applications and reports)
21. We may also collect non-identifiable information such as website usage data (e.g., cookies, analytics)
22. We do not knowingly collect personal information from minors without appropriate consent from a parent or guardian.
23. We use trusted third-party service providers (e.g. payment processors, cloud storage providers) who are contractually required to protect personal information and only use it for the purposes specified by the Foundation.

Part 4: Purposes of Collection

24. Collection of personal information must be limited to that which is necessary for the purposes of the Foundation. The Foundation must not require someone to consent to the collection, use or disclosure of personal information beyond what is necessary to our purpose.
25. We will only collect personal information that is necessary to fulfill the following purposes:
 - a. To verify identity
 - b. To provide donors with information about how donated funds are used by the Foundation
 - c. To keep donors informed about the Foundation's activities
 - d. To determine donor motivation in creating a fund and assist in making decisions about distributions from the fund
 - e. For the purposes of establishing, managing, or terminating employment (letters of application, results of interview, personal references, performance evaluations, letters of resignation or termination), including Volunteers
 - f. To issue charitable tax receipts to donors (names, addresses and other personal information) and comply with the CRA for requirements for gift processing
 - g. Organizational governance (board member names, addresses, phone numbers, date of birth, etc.)
 - h. To inform the development/evaluation of our programs
 - i. For other purposes that are reasonably considered to be within the mandate of the Foundation.

Part 5: Consent

26. The Foundation obtains consent for the collection, use, and disclosure of personal information in accordance with applicable privacy legislation and Canada's Anti-Spam Legislation (CASL). Consent may be express or implied, depending on the nature of the information and the relationship with the individual
27. Express consent remains valid until withdrawn, unless otherwise required by law or internal policy review.
28. Implied consent may be relied upon where appropriate and generally remains valid for up to two years under CASL following an individual's last interaction with the Foundation.
29. The Foundation will obtain express written consent from people in order to use photographs of them in any public-facing materials, whether online or in print.
30. The collection of personal information shall be limited to that which is necessary for the purposes identified by the Foundation. Even if an individual volunteers more personal information than is needed for our intended purposes, we will not record, use or disclose the irrelevant information.

31. A description of the purposes for the collection, use and disclosure of personal information will be included on consent forms. Such description must include when and to whom we will disclose the personal information.

Part 6: Using and Disclosing Personal Information

32. We will only use or disclose personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes.
33. We will not use or disclose personal information for any additional purpose unless we obtain consent to do so.
34. Personal information such as the name and address of a donor may be disclosed to a recipient organization or individual only when consent has been obtained from a donor.
35. We will not sell personal information about clients, volunteer, staff or donor lists to other parties.

Part 7: Cancelling or Changing Consent

36. A person can modify, withhold or withdraw their consent for the Foundation to use their personal information. A person's decision to modify, withhold or withdraw their consent to the use of personal information may restrict our ability to provide a particular service. If so, we will explain the situation to assist the person in making the decision.

Part 8: Access and Correction to Personal Information

37. People have a right to access their personal information held by the Foundation and to request corrections if it is inaccurate or incomplete.
38. A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought.
39. A request to access personal information should be forwarded to the Privacy Officer. The requesting individual will be asked to provide proof of identity.
40. Upon request, we will inform individuals how we use and have used their personal information and to whom it has been disclosed, if applicable.
41. We will make requested information available within 30 business days or provide written notice of an extension where additional time is required to fulfill the request. If a request is refused in full or in part, we will notify the individual in writing, providing the reasons for refusal and the recourse available to them.

Part 9: Ensuring Accuracy of Personal Information

42. We will make reasonable efforts to ensure that personal information is accurate and complete where it may be used to make a decision about an individual or disclosed to another organization.
43. Individuals may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.

Part 10: Protection of Personal Information

44. To the best of our abilities, we will ensure the security of personal information to protect it from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.
45. The following measures will be implemented to ensure personal information is appropriately protected:
 - a. Administrative Safeguards
 - i. All staff and directors will be trained on privacy policies and procedures.
 - ii. All staff, volunteers, and contractors are required to sign confidentiality agreements indicating their understanding of the privacy laws and policies and agree to abide by them.
 - iii. Avoid discussing a person's personal information in a way that would disclose the information to someone who is not entitled to receive it.
 - b. Physical Safeguards
 - i. Personal information will be stored in a locked location that is not accessible to the public.
 - ii. Confidential destruction of personal information including cross-shredding of documents and deleting and wiping electronically stored information.
 - c. Technology Safeguards
 - i. Use of unique user IDs and passwords for all users for systems access.
 - ii. Portable electronic devices such as tablets and laptops must be under one person's control at all times. They must not be left unattended in a car or in any other unsecured location.
 - iii. Any cloud services used to transmit or store data are password protected and use encryption or two-factor authentication.
 - iv. Personal information is stored and processed inside Canada only.

Part 11: Privacy Breach Response

46. In the event of a breach of personal information, the Foundation will:
 - a. Contain the breach and assess risks
 - b. Notify affected individuals where there is a risk of harm

- c. Report to the Office of the Information and Privacy Commissioner of BC where required
- d. Take steps to prevent future breaches

Part 12: Retention of Personal Information

- 47. If we use personal information to make a decision that directly affects an individual, we will retain that personal information for at least one year so that the individual has a reasonable opportunity to request access to it.
- 48. The Foundation must destroy documents containing employee personal information once the purpose for which the personal information was collected is no longer served by keeping it as long as the law does not require otherwise.
- 49. Subject to the above, we will retain personal information only as long as necessary to fulfill the identified purposes or other lawful purpose.
- 50. Any cloud service provider used by the Society will have a clear and consistently applied privacy policy.

Part 13: Compliance and the Privacy Officer

- 51. The Foundation must designate a Privacy Officer. The Executive Director will serve as the privacy officer for the Foundation. The Privacy Officer is responsible for ensuring the organization's compliance with this policy and the *Personal Information Protection Act* and other applicable legislation related to privacy.
- 52. The name and contact information for the Privacy Officer will be made available to the public on the Foundation's website.
- 53. The 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 procedures will be easily accessible.
- 54. Individuals should direct any complaints, concerns, requests or questions in writing to the Privacy Officer.
- 55. The Society's designated Privacy Officer is the Executive Director.

Part 14: Cookies and Website Analytics

- 56. Our website may use cookies and similar technologies to:
 - a. Understand how visitors use our site

- b. Improve user experience
- c. Support marketing and outreach efforts

57. Browser settings can be adjusted to refuse cookies if preferred.

Part 15: Third-Party Links

58. Our website may contain links to external websites. The Squamish Community Foundation is not responsible for the privacy practices of those sites and encourages users to review their policies.

Part 16: Changes To This Policy

59. We may update this Privacy Policy from time to time. Updates will be posted on this page with a revised "Last updated" date.

Contact Us:

If you have questions about this Privacy Policy or how your information is handled, please contact:

Privacy Officer:

Squamish Community Foundation

Email: info@squamishfoundation.com

Phone: 604.848.8683

Website: www.squamishfoundation.com

This policy will be reviewed every two years.