# White Ribbon

Approved: July 14, 2021 Revision:

## **Privacy Policy**

## Who we are?

White Ribbon is the world's largest movement of men and boys working to end violence against women and girls, promote gender equity, healthy relationships and a new vision of masculinity. Since its inception in Toronto in 1991, White Ribbon Campaign initiatives have been organized in over 60 countries around the world. Among its many calls to action, White Ribbon asks men and boys to wear white ribbons as a sign of their pledge to never commit, condone or remain silent about all forms of gender-based violence. Funds raised are used to undertake initiatives including training and education to raise awareness to engage men and boys in gender equality, healthy masculinities, and in ending gender-based violence.

## **Personal Information Protection Policy**

White Ribbon is committed to safeguarding the personal information entrusted to us by our supporters, clients, stakeholders. We manage your personal information in accordance with <u>The</u> <u>Personal Information Protection and Electronic Documents Act (PIPEDA)</u>.

This policy outlines the principles and practices we follow in protecting your personal information.

This policy applies to White Ribbon and to any person providing services on our behalf. A copy of this policy is provided to any supporters, clients, stakeholders on request.

## 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.

## What personal information do we collect?

We collect only the personal information that we need for the purposes of providing services to our supporters, clients, stakeholders including personal information needed to:

- Deliver requested products and services;
- Enrol a client in a program;
- Receive donations made to White Ribbon.

We normally collect client (includes supporters, stakeholders) personal information directly from our clients. We may collect your information from other persons with your consent or as authorized by law.

We inform our clients, before or at the time of collecting personal information, of the purposes for which we are collecting the information. The only time we don't provide this notification is when a client volunteers information for an obvious purpose (for example, producing a credit

card to make a donation, purchase white ribbon materials when the information will be used only to process the payment).

## Consent

We ask for consent to collect, use or disclose client personal information, 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.

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.

We ask for your express consent for some purposes and may not be able to provide certain service 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, by telephone), or in writing (by signing a consent form).

In cases that do not involve sensitive personal information, we may rely on "opt-out" consent. For example, we may disclose your contact information to other organizations that we believe may be of interest to you, unless you request that we do not disclose your information. You can do this by checking the appropriate box on our application form or by telephoning our local number/toll-free number.

A client may withdraw consent to the use and disclosure of personal information at any time, unless the personal information is necessary for us to fulfil our legal obligations. 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.

We may collect, use or disclose client personal information without consent only as authorized by law. For example, we may not request consent when the collection, use or disclosure is to determine suitability for an honour or award, or in an emergency that threatens life, health or safety.

#### How do we use and disclose personal information?

We use and disclose client personal information only for the purpose 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).

#### What is personal employee information?

Personal employee information is personal information about an employee or volunteer which is collected, used or disclosed solely for the purposes of establishing, managing or terminating an employment relationship or a volunteer work relationship. Personal employee information may, in some circumstances, include a Social Insurance Number, a performance review, etc.

We can collect, use, disclose your personal employee information without your consent only for the purposes of establishing, managing or ending the employment or volunteer relationship. We will provide current employees and volunteers with prior notice about what information we collect, use or disclose and our purpose for doing so.

## What personal employee information do we collect, use and disclose?

We collect, use and disclose personal employee information to meet the following purposes:

- Determining eligibility for employment or volunteer work, including verifying qualifications and references
- Establishing training and development requirements
- Assessing performance and managing performance issues if 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. governments grants)
- Complying with applicable laws (e.g. Canada Income Tax Act,)

We only collect, use and disclose the amount and type of personal employee information that is reasonable to meet the above purposes. The following is a list of personal employee information that we may collect, use and disclose to meet those purposes:

- Contact information such as your name, home address, telephone number
- Criminal background checks
- Employment or volunteer information such as your resume (including educational background, work history and references), reference information and interview notes, letters of offer and acceptance of employment, policy acknowledgement forms, background verification information, workplace performance evaluations, emergency contacts, etc.
- Benefit information such as forms relating to applications or changes to health and insurance benefits including medical and dental care, life insurance, short and long term disability, etc. (paid employees only)
- Financial information, such as pay cheque deposit information and tax-related information, including Social Insurance Numbers (paid employees only)
- Other personal information required for the purposes of our employment or volunteer relationship

We will inform our employees and volunteers of any new purpose for which we will collect, use, or disclose personal employee information, or we will obtain your consent, before or at the time the information is collected.

We will obtain your consent to collect, use and disclose your personal information for purposes unrelated to the employment or volunteer relationship (e.g. such as providing you with information about our workplace charity program).

You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization. In addition, you may request a correction of an error or omission in your personal information.

We will respond to your request within 60 calendar days, unless an extension is granted. We may charge a reasonable fee to provide information, but not to make a correction. We do not

charge fees when the request is for personal employee information. We will advise you of any fees that may apply before beginning to process your request.

## Storage and Security of information

We are committed to protecting the privacy and security of your personal data.

We maintain personal information so collected either in print form and or digital form and saved with our computer and also on the cloud in digital form. All reasonable measures such as password protections are in place to safeguard the security of data.

## **Information Retention**

Our general rule is that we only hold personal data for as long as necessary for us to provide the services that we have agreed to provide to you. In some circumstances, we may retain personal data for other periods of time, for instance where we are required to do so in accordance with legal, tax and accounting requirements, or if required to do so by a legal process, legal authority, or other governmental entity having authority to make the request, for so long as required.

#### **Questions and complaints**

If you have a question or concern about any collection, use or disclosure of personal information by White Ribbon, or about a request for access to your own personal information, please contact Executive Director, White Ribbon at <u>info@whiteribbon.ca</u>.