

 <p>Marsland Centre 20 Erb St. W. 11th Fl Waterloo, ON N2L 1T2 Phone 519-888-6100 Fax: 519-888-7737</p>	Policy: Privacy Policy	Approval Date: June 25, 2009
		Effective Date: June 25, 2009
	By-Law Reference: All activities will be in accordance with the By-Laws.	Next Review Date: June 2010
		Approved By: The Board of Directors

Policy Statement: United Way of Kitchener-Waterloo and Area (United Way) is committed to protecting the privacy of individuals, corporations and clients by complying with all applicable Canadian privacy legislation as it affects its employees, volunteers, donors and agencies.

Purpose: To protect the confidentiality of personal information collected and used by United Way, and to ensure full compliance with the Canadian Standards Association Model Code for the Protection of Personal Information (PIPEDA).

Scope: This policy applies to all Board members, staff and volunteers of United Way.

Procedures: The Privacy Officer and the Chief Financial Officer shall be responsible to ensure the 10 principles are followed utilizing the following practices:

Accountability

- 1) Privacy policy and practices will be integrated in new staff and volunteers' orientation.
- 2) The Privacy Officer will conduct an annual privacy training update session with all staff and volunteers to ensure ongoing commitment to privacy.
- 3) All staff, Board of Directors and Committee Volunteers must read and sign an agreement of confidentiality (Appendix A).
- 4) Annually, United Way shall conduct a privacy audit to ensure that any new legislation principles have been implemented, and that all practices and procedures are being followed. The results shall be reported to the Board of Directors.
- 5) The Board of Directors will review this policy annually.

Identifying Purpose

- 6) The purpose for collecting personal and/or corporate information will be identified prior to, or at the time of collection of the information.
- 7) When personal or corporate information is to be used for a purpose other than the original intent, consent of the individual or representative of the corporation will be obtained.

Consent

- 8) Personal and corporate information will not be published without consent.

Limiting Collection

- 9) The collection of personal and/or corporate information shall be limited to that which is necessary for the purposes of United Way.

Limiting Use, Disclosure and Retention

- 10) Personal information shall not be used or disclosed for purposes other than that for which it was collected

- 11) Personal and/or corporate information will be removed from any mailing lists at the request of the individual or representative of the Corporation, or at such time as the information is no longer required by United Way for business or government retention purposes.

Accuracy

- 12) United Way shall ensure that personal information is accurate, complete and up-to-date, based on documentation provided by the individual or representative.

Safeguards

- 13) Access to sensitive personal and corporate information will be limited to senior staff.
- 14) Access to personal information contained in technology systems will be limited by passwords, and only to those having appropriate authority.
- 15) Appropriate safeguards will be in place to ensure all personal and corporate information is physically protected from theft, damage and manipulation.

Openness

- 16) Privacy and confidentiality statements will be clearly outlined on the agreement, on the web-site and on correspondence as appropriate (ie. emails, faxes).

Individual Access

- 17) Upon written request, an individual or corporation shall be informed of the existence, use and disclosure of personal information and given access to that information.

Provide Recourse

- 18) Complaints regarding safeguarding, accuracy, consent, disclosure, retention, destruction, use or access to personal and/or corporate information will be directed to the United Way Privacy Officer, who will report the complaint to the Chair of the Board of Directors.
- 19) All complaints will be investigated and responses provided in a timely manner. United Way will take appropriate measures to correct information and/or information-handling procedures, practices and procedures.

Designated Privacy Officer: Cathy Snyder, Chief Financial Officer

Staff Position Responsible for this Policy: Chief Financial Officer

Policy Review: Annually