

III-4 Privacy policy

A. Purpose of policy

To define how Focus on the Family (Canada) is committed to respect the privacy of its constituents and employees.

B. Overview

Focus on the Family (Canada) is committed to protecting the privacy, confidentiality and security of the personal information of Focus constituents, supporters and other stakeholders. Focus on the Family (Canada) values the trust of those we deal with and recognize that maintaining that trust requires that we be transparent and accountable in how we treat the information that you provide to us.

During the course of Focus' various activities, Focus frequently gathers and uses personal information. Anyone from whom Focus collects such information should expect that it will be carefully protected and that except as otherwise legally required or permitted any use or other dealing with this information is subject to consent. Focus' privacy practices are designed to achieve this.

Personal information gathered by Focus is kept in confidence. Focus staff are authorized to access personal information based only on their need to deal with the information for the reasons for which it was obtained. Safeguards are in place to ensure that the information is not disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered. Focus also take measures to ensure the integrity of this information is maintained and to prevent it being lost or destroyed.

This policy is based on the *Ten Privacy Principles* contained in the Canadian Standards Association (CSA) Model Code for the protection of personal information and on which the relevant privacy legislation is founded. Focus has tailored its own ten privacy principles in compliance with the relevant privacy legislation to meet the specific needs and expectations of its stakeholders.

C. Scope of policy

This policy applies to personal information of individual stakeholders in the possession and control of Focus. This policy does not apply to employee and volunteer personal information. This information is covered by the Focus Privacy Policy for Employees and Volunteers. This policy also does not apply to information collected, used or disclosed with respect to corporate or commercial entities that deal with Focus. Corporate and commercial information is protected by other policies and practices of Focus and through contractual arrangements.

This policy does not apply to the collection, use or disclosure of your contact information or publically available information by Focus.

D. Definitions

In this policy:

- **“business contact information”** means information to contact a person at a place of business, including the person’s name, position, business address, business telephone number, business e-mail address and business fax number.
- **“collection”** means the act of gathering, acquiring, or obtaining personal information from any source, including third parties, by any means.
- **“consent”** means voluntary agreement to the collection, use and disclosure of personal information for specified purposes. Consent may be express or implied. Express consent may be given orally or in writing, if it is clear and does not require any inference on the part of Focus. Implied consent exists when Focus can reasonably infer consent based upon your action or inaction.
- **“disclosure”** means making personal information available to others outside of Focus.
- **“personal information”** means information about an identifiable person that is recorded in any form but does not include his or her business contact information. Personal information includes a person’s age, gender, race, ethnic origin, identification numbers, financial and credit information, personal health information, religious affiliations, donation history, travel history, consumer preference information, personal habits, personal interests and personal history. Personal information does not include information that cannot be associated with a specific person.
- **“privacy officer”** means a person designated by Focus who is accountable for compliance with this policy by Focus and whose name and contact information are set out at the end of this policy.
- **“third party”** means a person or organization other than Focus and you.
- **“use”** means the treatment and handling of personal information by and within Focus.
- **“Focus”** means Focus on the Family (Canada) Association which operates a ministry at Langley, BC.
- **“you”** means a constituent, supporter and anyone else from whom Focus collects personal information, except for employees and volunteers of Focus for whom Focus has a separate privacy policy.

E. Accountability

Focus is accountable and responsible for personal information under its control, including information that has been transferred to a third party. In cases where such transfers take place Focus will ensure

that the third party has comparable privacy safeguards in place. Focus has designated a privacy officer to ensure compliance with this policy.

Ultimate accountability for Focus' compliance rests with the Board of Directors of Focus who delegate day-to-day accountability to the privacy officer. Other persons within Focus may be accountable for the day-to-day collection and processing of personal information or may act on behalf of the privacy officer.

Focus will adopt policies, procedures and practices to protect personal information, receive and respond to complaints and inquiries, train staff regarding privacy policies, procedures and practices and communicate policies, procedures and practices to you.

F. Identifying the purposes of personal information

When collecting personal information Focus will orally or in writing state the purpose of collection and will provide, on request, contact information for the privacy officer who can answer questions about the collection.

Focus may collect your personal information for the following purposes:

- to provide and administer resource materials and other related products and services through Focus;
- to provide administrative services through Focus;
- to contact constituents, supporters and other stakeholders regarding resource materials and other related products and services of Focus
- to contact constituents, supporters or other stakeholders for special events, promotions, fund raising and other similar matters, which are directly or indirectly beneficial to Focus;
- to administer the policies, procedures and practices of Focus;
- to thank and publically recognize constituents, supporters and other stakeholders;
- to provide constituents, supporters and other stakeholders with information about how donated funds are used by Focus;
- to keep constituents, supporters and other stakeholders informed about Focus activities;
- to promote opportunities for constituents, supporters, potential constituents and supporters and other stakeholders to support Focus;
- to establish and maintain lists of constituents, supporters and other stakeholders;
- to conduct surveys or research;

- to compile statistical and historical information about constituents, supporters and other stakeholders;
- to establish and maintain subscriptions to publications of Focus or related organizations;
- to build and maintain relationships among stakeholders within Focus;
- to disclose information requested by third parties (with permission of constituents, supporters or other stakeholders);
- to protect Focus, you and others from fraud and error and to safeguard the interest of Focus and its staff and representatives;
- to authenticate your identity;
- to collect debts owed by you to Focus;
- to ensure staff and contractors comply with their agreements and legal obligations to Focus;
- to administer relations with the provincial and federal authorities, Focus on the Family in the United States (“Focus U.S.”), * and other ministry organizations with whom Focus has relations from time to time;
- to comply with Canada Revenue Agency requirements for gift processing;
- to comply with any legal or regulatory requirement; and
- to use and disclose for any other purpose directly or indirectly related to establishment or operation of Focus.

The above collections, uses and disclosures are a reasonably necessary part of your relationship with Focus.

When your personal information is to be used for a purpose not previously identified, the new purpose will be disclosed to you prior to such use, and your consent will be sought unless the use is permitted or required by law.

G. Consent

Focus will obtain your consent to collect, use or disclose personal information except where Focus is permitted or required by law to do so without consent. For example Focus may collect, use or disclose personal information without your consent where:

- Focus reasonably expects that obtaining consent would compromise an investigation or proceeding;

- Focus' use of the information is for acting in an emergency that threatens a person's life, health or personal security;
- Focus is collecting or paying a debt;
- Focus is obtaining legal advice; or
- Focus needs to deal with an anticipated breach of law;
- Focus will make reasonable efforts to ensure that you understand how your personal information will be used and disclosed.

Your consent may be express or implied and may be given through an authorized representative such as a lawyer or agent. If you are under the legal age, your consent may be obtained from a parent or guardian.

Express consent may be given orally, in writing or electronically. For example, oral consent could be given over the telephone when information is being collected; electronically when submitting an agreement, application or other information; or in writing when signing an agreement or application. Consent may be implied by Focus if the purpose for the collection of the information would be reasonably obvious to you and is given voluntarily by you for that purpose. Consent may also be implied where Focus notifies you that Focus intends to collect, use or disclose information and you do not decline Focus' intended action within a reasonable period of time. The manner in which Focus obtains consent for the collection of personal information will vary with the sensitivity of the information being collected.

You may withdraw your consent at any time, subject to legal or contractual restrictions, provided that Focus is given reasonable written notice. Focus will inform you of the likely consequences of the withdrawal of consent, which may include the inability of Focus to provide certain products or services to you.

H. Limits for collecting personal information

Focus will only collect personal information that is reasonably necessary to provide a product or service either directly or indirectly and which is reasonably necessary for the purposes which you consented to. Focus will collect personal information by lawful means. Focus may also collect information as permitted or required by law.

I. Limits for using, disclosing and keeping personal information

Your personal information will only be used or disclosed for the purpose for which it was collected. Focus will not use personal information for any additional purpose unless Focus seeks your consent to do so.

Focus may periodically use your personal information to conduct surveys in order to enhance Focus' provision of products or services.

Focus will not sell constituent, supporter or other stakeholder lists or personal information to third parties.

Subject to applicable legal requirements, Focus and Focus U.S. may transfer personal information between each other. Focus U.S. will only use or disclose your personal information in accordance with the policies, procedures and practices of Focus except where Focus U.S. is permitted or required by law to do otherwise. Focus U.S. will only use or disclose your personal information for the purposes for which it was collected and to assist Focus U.S. in carrying out duties on behalf of Focus except where Focus U.S. is permitted or required by law to do otherwise.

Focus will retain your personal information only so long as necessary for the identified purposes or for necessary legal or business purposes. Focus will keep your personal information used to make a decision affecting you for a least one year after using it to make the decision. Focus will destroy, erase or make anonymous documents or the records containing personal information as soon as it is no longer serving the purpose for which it was collected and is no longer necessary for legal or business purposes.

J. Accuracy

Focus will make reasonable efforts to ensure your personal information is as accurate, complete and current as required for the purposes for which it was collected. In some cases, Focus will rely on you to ensure that certain information, such as your street address, e-mail address or telephone number, is current, complete and accurate.

Focus will not routinely update your personal information unless it is necessary to fulfill the purposes for which it was collected. You may request amendments to the records at Focus to ensure the accuracy and completeness of your personal information. If the amendment request relates to information that remains in dispute, Focus will note your opinion on the file.

K. Safeguarding personal information

Focus is committed to the safekeeping of your personal information in order to prevent its loss, theft, unauthorized access, disclosure, duplication, use or modification.

Depending on the sensitivity of your personal information, Focus will employ appropriate security measures to protect the information. The measures may include, for example, the physical security of offices and data centers, the limiting of access on a “need-to-know” basis and the use of passwords and encryption.

Focus will also use appropriate security measures when disposing of your personal information.

Focus will require third parties through contractual or other reasonable means to safeguard your personal information entrusted to them in a manner consistent with the policies, procedures and practices of Focus.

L. Availability of policies and procedures

Focus is open about the policies, procedures and practices it uses to protect your personal information. Information about these policies, procedures and practices will be made available to you either

electronically or in writing. To ensure the integrity of our security procedures and business methods, Focus may refuse to publically disclose certain information.

Focus will make the following information available:

- The name, title and address of the person accountable for the policies, procedures and practices and to whom complaints or inquiries can be provided;
- A description of the type of personal information held by Focus, including a general account of its use;
- A copy of any brochures or other information that explain the policies, procedures and practices; and
- An explanation of what personal information is made available to related organizations.

M. Providing access to personal information

You have a right to access your personal information held by Focus. Upon request and confirmation of your identity, Focus will, within a reasonable period of time, tell you what personal information it has, what it is being used for and to whom it has been disclosed. You may be asked to be specific about the information that you would like to access and to submit your request in writing. Depending on the type and amount of information requested, Focus may charge you a reasonable fee for providing you with access to your information. Where a cost will be incurred by you, Focus will inform you of the cost and request your direction on whether or not Focus should proceed with the request.

Focus will make the information available within 30 days or provide written notice where additional time is required to fulfill the request.

In some situations, Focus may not be able to provide access to certain personal information. The reasons for not providing this information may include that it is information that would threaten the life or security of another person, information generated in a formal dispute resolution process, information that contains references to other individuals, information that cannot be disclosed for legal, security or commercial proprietary reasons and information that is subject to solicitor-client privilege.

If a request is refused, Focus will notify you in writing, setting out the reasons for the refusal and resources for redress available to you.

If your personal information is demonstrated to be inaccurate or incomplete, Focus will amend the information as required. Where appropriate Focus will send the amended information to third parties to whom the information has been disclosed.

N. Compliance and complaints

Focus will, on request, provide you with information regarding its complaint response procedure.

You are to direct any complaints, concerns or questions regarding this policy in writing to the privacy officer. If the privacy officer is unable to address your concern, the issue can be referred to the Board of Directors of Focus. At any point in this process you may also write to the Privacy Commissioner.

Contact Information:

Focus on the Family (Canada) Association

19946 - 80 A Ave

Langley, BC

V2Y 0J8

Attention: The Privacy Officer