

Title: Privacy Policy and Terms of Use

Policy Type: Board

Status: Approved – Dec. 12/17

Date of Last Revision: December 12, 2017

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## **AWASCO - PRIVACY POLICY AND TERMS OF USE**

### **PRIVACY POLICY**

Animal Welfare Agency South Central Ontario (“AWASCO”) is dedicated to protecting your privacy and maintaining the trust that you have placed in us. As such, our privacy policy (“Privacy Policy”) incorporates the standards set out in federal and provincial legislation.

#### **1.0 Collection and Use of Personal Information**

AWASCO is committed to identifying the purposes for which personal information is collected at or before the time the information is collected and to documenting the purposes for which personal information is collected.

- 1.1 We may collect banking and credit card information to receive and process donations. In addition, we may collect contact information to acknowledge donations and issue tax receipts. We deeply appreciate your financial support. We may contact you to inform you of and to request your support for our future endeavours because you have demonstrated an interest in supporting AWASCO’s mission.
- 1.2 We may collect credit card information to receive and process fees for services, licenses and/or programs.
- 1.3 We may collect statistical information to raise awareness of and increase potential for fundraising.
- 1.4 We may collect your name, mailing address and email address in order to send you newsletters that you have signed up for.
- 1.5 We may collect personal information from past, present and prospective volunteers, employees and members for administrative or management purposes, such as to establish, manage or terminate volunteer, employment or member relationship.
- 1.6 We do not collect personal information indiscriminately. Both the amount and the type of information we collect is limited to that which is necessary to fulfil the general purposes outlined above.
- 1.7 We will not use previously collected personal information for a new purpose without first identifying the new purpose and obtaining your consent for the new use, unless otherwise permitted by law.

Title: Privacy Policy and Terms of Use

Policy Type: Board

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Date of Last Revision: December 12, 2017

---

- 1.8 You may direct any questions concerning the collection, the use which will be made of the information, the categories or person who will have access to it within the organization, the place where the file will be kept and your rights of access and rectification to our Privacy Compliance Officer.

## **2.0 Obtaining Consent**

AWASCO is committed to obtaining your consent for the collection of your personal information and the subsequent use or disclosure of this information, unless otherwise permitted by law.

- 2.1 In obtaining consent, we make a reasonable effort to ensure that you are advised, in a manner that can be reasonably understood, of the purposes for which the information will be used.
- 2.2 Consent can be obtained in many ways. Consent can be expressed or implied. You may also provide your consent in some circumstances where notice has been provided to you about our intentions with respect to your personal information and you have not withdrawn your consent for an identified purpose, such as by using an “opt out” option provide, if any. In determining the appropriate form of consent, we will take into account the sensitivity of the personal information and the reasonable expectations of individuals with whom we deal with.
- 2.3 Generally, by providing us with personal information, we will assume that you consent to our collection, use and disclosure of such information for the purpose described in the Privacy Policy or otherwise at the time of collection. By providing us with personal information about another individual, you represent that you have consent from that person to provide his or her personal information to us.
- 2.4 You may withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting our Privacy Compliance Officer. Please note that the withdrawal of your consent may impact on our ability to serve you and to maintain our relationship.
- 2.5 In certain circumstances personal information can be collected, used or disclosed without your knowledge and consent. For example, legal, medical or security reasons may make it impossible or impractical to seek consent. When information is being collected for the detection and prevention of fraud or for law enforcement, seeking consent might defeat the purpose of collecting the information. Seeking consent may be impossible or inappropriate if you were a minor, seriously ill, or mentally incapacitated. In addition, we may not be able to seek consent if we do not have a direct relationship with you. For example, seeking consent may be impractical for a charity or a direct-marketing firm that wishes to acquire a mailing

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---

list from another organization. In such cases, the organization providing the list would be expected to obtain your consent before disclosing personal information. Finally, we may collect information without your consent if the collection is reasonable for the purposes of establishing, managing or terminating an employment or volunteer relationship.

- 2.6 We may rely on third parties to obtain your consent to our collection, use and disclosure of personal information when we cannot seek consent directly from you. For example, seeking consent directly from you may not be possible when we acquire a mailing list from another organization. In such cases, the organization providing the list would be expected to obtain your consent before disclosing personal information to us.

### **3.0 Use And Disclosure of Personal Information**

AWASCO does not sell or share Personal information. We may disclose or transfer personal information as necessary in order to administer its programs and services, including as described below.

- 3.1 We may transfer personal information to our service providers who need access to personal information to carry out their work for us, including processing donations, sending communications, data hosting, data processing and information technology and other similar purposes. We use contractual or other means to require service providers to provide a level of security comparable to that provided under our Privacy Policy.
- 3.2 We may use and disclose personal information in connection with the proposed or actual financing, securitization, insuring, sales, assignment or other disposal of all or part of our organization or assets, for the purposes of evaluating and/or performing the proposed transaction. Assignees or successors of AWASCO or our organization or assets may use and disclose your personal information for similar purposes as those described in this policy.
- 3.3 We may disclose personal information as necessary to meet legal, regulatory, insurance, audit and security requirements, or otherwise with your consent or as permitted or required by law.

### **4.0 Protection of Personal Information**

AWASCO is committed to protecting your personal information by security safeguards appropriate to the sensitivity of the information.

Title: Privacy Policy and Terms of Use

Policy Type: Board

Status: Approved – Dec. 12/17

Date of Last Revision: December 12, 2017

---

- 4.1 We take reasonable steps to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification; regardless of the format in which it is held, including by using: (i) physical security measures, such as locked filing cabinets and restricted access to areas where personal information is stored; (ii) organizational security measures, such as employee training, security clearances and limiting access to a “need-to-know” basis; and (iii) technological security measures, such as passwords and encryption, to prevent unauthorized access to personal information stored on computer systems.
- 4.2 When disposing of or destroying personal information which is no longer needed, we ensure that appropriate measures are taken regarding the disposal or destruction so as to prevent unauthorized parties from gaining access to the personal information.

## **5.0 Retention Of Personal Information**

- 5.1 AWASCO is committed to retaining your personal information only as long as necessary for the fulfilment of the general purposes outlined above or for the fulfilment of legal or business purposes.

## **6.0 Access To Personal Information**

Upon receipt of a written request, AWASCO will inform you of the existence, use and disclosure of your personal information and will give you access to that information. You will be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

- 6.1 Upon receipt of your written request, we will provide an account of the use that has been made or is being made of your personal information and an account of the third parties to which it has been disclosed. When it is not possible to provide a list of the third parties to which we have actually disclosed your personal information, we will provide a list of organizations to which we may have disclosed your personal information. In responding to your written request, we may require you to provide sufficient information to permit us to verify your identification before we provide an account of the existence, use and disclosure of your personal information. Please forward your request in writing to our Privacy Compliance Officer at the address set out herein.
- 6.2 Within 30 days after receipt of your written request, we will either respond to your query or send you a notice of extension, advising you of the new time limit, the reasons for extending the time limit and your right to make a complaint to the Commissioner. We may extend the time limit for a maximum of 30 days if meeting the time limit would unreasonably interfere with our activities or is

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Date of Last Revision: December 12, 2017

---

impracticable because we need to undertake consultations necessary to respond to your query. Or, we may extend the time limit for whatever period is necessary to convert the personal information into an alternative format.

- 6.3 We will respond to your written request at no or minimal cost to you. If there is a cost involved for the transcription, reproduction or transmission of your personal information, we will inform you of the approximate cost beforehand and will only proceed if you have advised us that the request is not being withdrawn.
- 6.4 In certain situations, we may not be able to provide access to all the personal information we hold about you. Exceptions may include information that is prohibitively costly to provide, that contains references to other individuals that cannot be disclosed for legal, security or commercial proprietary reasons and that is subject to solicitor-client or litigation privilege. However, if the information containing the exceptions is severable, we will sever the information and provide you with access to the remaining information.
- 6.5 The reasons for denying access and the statutory provision on which the refusal is based will be provided to you in writing, along with any recourse that you may have under federal and provincial legislation.
- 6.6 We do not routinely update personal information unless such a process is necessary to fulfil the purposes for which the information was collected or we receive notification from you to do so. If you are aware of changes to the personal information you have given us, simply write our Privacy Compliance Officer and we will update our records accordingly.
- 6.7 When the accuracy or completeness of your personal information is successfully challenged, we will amend your personal information as required and issue a copy of any personal information modified or added or an attestation that personal information has been deleted. Where appropriate, the amended information will be transmitted to third parties having access to the information in question.
- 6.8 Any unresolved challenges will be recorded in your file. Where appropriate, the existence of the unresolved challenge will be transmitted to third parties having access to the information in question.

## **7.0 Compliance**

In meeting our privacy responsibilities, AWASCO will act in a reasonable manner as required by the circumstances.

## ANIMAL WELFARE AGENCY SOUTH CENTRAL ONTARIO

Title: Privacy Policy and Terms of Use

Policy Type: Board

Status: Approved – Dec. 12/17

Date of Last Revision: December 12, 2017

---

- 7.1 We have designated our Human Resource Manager as our Privacy Compliance Officer. The Privacy Compliance Officer can be reached by regular mail at:

ATTENTION: Privacy Compliance Officer  
ANIMAL WELFARE AGENCY SOUTH CENTRAL ONTARIO  
250 Riverbend Drive, Kitchener, ON N2B 2E9

Or by e-mail at: [privacy@awasco.ca](mailto:privacy@awasco.ca)

- 7.2 A challenge concerning compliance with privacy laws can be addressed by our Privacy Compliance Officer.
- 7.3 We investigate all complaints. If a complaint is found to be justified, then we take appropriate measures to resolve the matter. If necessary, we will amend our policies and practices.
- 7.4 We reserve the right to seek legal advice where appropriate before providing a final response to inquiries or complaints.

### **8.0 Internet Usage**

- 8.1 When you visit AWASCO's websites at [www.kwhumane.com](http://www.kwhumane.com) or [www.sphumane.com](http://www.sphumane.com) to obtain information about it, to research its products and services, or to use its on-line tools, please rest assured that we do not collect identifying information about you unless you specifically provide it. The only information we collect is non-identifying information (such as the ISP, the type of Internet browser used, the referring website, the pages requested and the date and time of those request) to create aggregate data in order to determine the level of interest in the information provided on the website and to improve the content of the website.
- 8.2 We collect this non-identifying information through the use of cookies and server log files, including IP addresses. Our website does not link IP addresses to any personally identifiable information. Cookies identify which areas of our website you have visited or customized, and make these pages readily accessible the next time you visit. If you do not want non-identifying information collected through the use of cookies, you can disable it by changing the setting of your Internet browser.
- 8.3 In addition, we may provide links to other websites managed by third parties or permit third parties to offer users subscriptions and registration-based services through its website. As we cannot control or be responsible for the actions or policies of such third parties, you should check the applicable privacy policy of

Title: Privacy Policy and Terms of Use

Policy Type: Board

Status: Approved – Dec. 12/17

Date of Last Revision: December 12, 2017

---

such third parties when visiting their websites or when providing any personal information to them. Please also note that we cannot control or prevent the use of cookies or any information obtained through cookies by such third parties.

- 8.4 Please be advised that information voluntarily disclosed online in discussion areas and other public areas of our website can be collected, used and disclosed by third parties. Any submissions made to discussion areas or other public areas on our website are done at the user's risk and with the understanding that such information may be accessible to third parties. We cannot control and will not be liable for any damages that may arise for such user activity.

## **9.0 Changes To Privacy Policy**

- 9.1 AWASCO reserves the right to modify our Privacy Policy at our sole discretion. In particular, the Privacy Compliance Officer will periodically review and modify our Privacy Policy in response to developments and changes in privacy law. Any modifications shall be effective immediately upon its publication by any means, including posting on our websites. You agree to regularly review our Privacy Policy posted at our websites, be aware of any modifications and be bound by the same.