



## PRIVACY POLICY

June 2011

North Shore Neighbourhood House recognizes that in order to operate and deliver services, it needs to collect certain personal information on clients, employees, volunteers and donors. NSNH respects and upholds an individual's right to privacy and to protection of his or her personal information. NSNH is committed to ensuring compliance with applicable privacy legislation.

**Definition:** Personal information is defined as "information about an identifiable individual," and is not restricted to recorded information. It includes any factual or subjective information, in any form, about an "identifiable individual." Personal information does not include "contact information," defined as information enabling an individual to be contacted at his or her place of business including position, name or title, business telephone number, business address, business email or fax number.

The following principles govern the collection, use and disclosure of personal information:

- **Accountability** - NSNH is accountable for the personal information collected concerning clients, employees, volunteers and donors. A staff member is appointed as Privacy Officer and advises the ED on the agency's compliance with this policy.
- **Purposes for Collection, Use and Disclosure** - NSNH collects and uses information for the delivery of service, determining eligibility, statistical purposes, compliance with legislative and contractual requirements, employment purposes, issuing tax receipts and to keep donors informed.
- **Disclosure of Information to Third Parties** - The only circumstances under which personal information may be disclosed to third parties is for the fulfillment of any purposes identified above or as required by law. If personal information is disclosed to third parties for the fulfillment of any purpose as identified as above, the agency ensures that consent and appropriate security undertakings, such as confidentiality clauses in contractual agreements are employed to protect the transfer and use of personal information. NSNH does not sell, trade or rent information to third parties.
- **Limiting Collection** NSNH collects only personal information required for the purposed identified above.
- **Limited Use, Disclosure and Retention** - NSNH does not use or disclose personal information for any purpose other than those for which it was collected, except with consent or as required by law. Personal information is retained only as long as is necessary for the fulfillment of the purposes for which it was collected, or as required by law.
- **Accuracy** - NSNH makes all reasonable efforts to ensure that personal information is as accurate, complete and current as required for the purposes for which it was collected.
- **Safeguard** - NSNH protects information with appropriate security safeguards. In the event that there is an involuntary breach of security (e.g. theft, loss, electronic breach), the agency will immediately inform client and all impacted parties of the loss. Furthermore, the agency will provide necessary support, debriefing and safety planning for the impacted individual. The agency's privacy officer is notified of such breaches and all of these incidents are reviewed.
- **Access** - Individuals have the right to access their personal information under the control of the agency, except in certain exceptional situations. The Privacy Officer will assist with any access request.
- **Contact** - The ED designates a Privacy Officer and subsequent replacements when necessary.