



# Christmas Bureau of Edmonton Privacy Policy

Governance Committee	June 11, 2014	June 2017	June 11, 2014
<i>Owner</i>	<i>Date of Board Meeting Approval</i>	<i>Review Date</i>	<i>Effective Date</i>

## 1.0 POLICY STATEMENT

The Christmas Bureau of Edmonton (hereafter referred to as Christmas Bureau) respects the privacy of our stakeholders. We are committed to protect all personal information gathered and to use this information solely for the purpose for which it was collected.

The Christmas Bureau operates under the spirit of intent of the following:

- PIPA – Personal Information Privacy Act, Government of Alberta
- Association of Fundraising Professionals Code of Ethical Principles and Standards
- PIPEDA – Personal Information Protection and Electronic Documents Act , Government of Canada
- Canadian Anti-Spam Legislation, Government of Canada
- Canadian Code of Practice for Consumer Protection in Electronic Commerce, Government of Canada
- The Canadian Marketing Association Code of Ethics and Standards of Practises, Government of Canada

## 2.0 POLICY PRINCIPLES

Stakeholders of the Christmas Bureau are defined as:

- (a) Client Program – clients; partner agencies; referring agencies; hamper sponsors; and community festive celebration organizations
- (b) Donor Program – donors; third party fundraisers
- (c) Volunteer Program – volunteers; board of directors and committee members
- (d) Human Resources – employees; and project contracts

### (a) CLIENT PROGRAM

#### Clients

- Information collected from applicants, partnering and referring agencies will only be used to provide services in accordance with the mandate of the Christmas Bureau.
- Information collected includes name, address, phone number(s) and referral service, if applicable, of the primary applicant. Family composition, names of family members, relationships to primary applicant, ages and sex of family members are also collected for the provision of services and or to prevent duplication of services.
- Completion of an application form is implied consent for information to be used by partner agencies or hamper sponsors or volunteers (hamper delivery and Walk-In Days) of the Christmas Bureau to provide services.
- All partner agencies are expected to be signatory to the Christmas Bureau Client Program privacy guidelines.
- Applicable client information will be shared with participants in the Hamper Sponsorship Program who provide a hamper(s) in accordance with the Policy and Guidelines for Corporate and Individual Sponsors of Food Hampers and who must sign an Oath of Confidentiality.

- All employees and volunteers of the Christmas Bureau are required to sign an Oath of Confidentiality (see attached).
- Hard copies of client application forms are shredded annually. Electronic data is stored off site in a secure cloud based environment.

#### Partners, Hamper Sponsors, and Referring Agencies

- Contact information received from these agencies will only be used to contact said agency. In the case of hamper sponsors, contact information will be used to provide client contact information for delivery of services.
- Hamper Sponsors – hard copy information is maintained as backup information for one year. Electronic data is stored off site in a secure cloud based environment.
- Partner and Referring Agencies – information is stored electronically and is stored off site in a secure cloud based environment.

#### Community Festive Celebrations Program

- Applicant information collected for the Community Festive Celebrations Program (herein referred to as CFCP) will be used to communicate CFCP current year information, confirm event funding, and request a post-event report. Applications are for one year funding only.
- Contact information is stored electronically and is stored off site in a secure cloud based environment.
- Funding information is stored electronically on an excel spread sheet within the Christmas Bureau server and is backed up weekly and backup is stored off site.

**The Christmas Bureau is only responsible for the information received from partner and referring agencies. The Christmas Bureau is not responsible for the application of partner and referring agencies' privacy policies.**

#### (b) DONOR PROGRAM

##### Donors

- The Christmas Bureau collects information required to maintain accurate donor records for the purposes which further the charitable work of the Christmas Bureau.
- Information collected includes: name, address, phone number(s), email address, donation amount, years of donating, household relationships, mailing status and donor status.
- The personal information collected is used to process donations, receipts and notify donors of upcoming campaigns, events, volunteer opportunities and to provide status updates.
- Donating to the Christmas Bureau is implied consent for information to be used for the purpose of future donation requests, within a two year period from the last donation.
- Donors will be provided the opportunity to provide expressed consent to receive information regarding upcoming campaigns, events, volunteer opportunities or campaign status updates.
- The Christmas Bureau does not rent, sell, or trade our donor information lists.
- Hard copies of donation forms and source documents (credit card and copies of cheques) are kept in secure storage for a minimum of two years to a maximum of seven years, with the banking information blacked out. For credit cards, all but the last four digits and the expiry date are blacked out. For copies of cheques, the transit

and bank account number and donor signature are blacked out.

- Electronic data is stored off site in a secure cloud based environment. Only the last four numbers and expiry date of credit cards are electronically stored. For cheques, the cheque number and date of cheque is electronically store.

#### THIRD PARTY FUNDRAISERS

- The Christmas Bureau collects Third Party Fundraiser information for the purpose of event summary, thank you and acknowledgement, and to contact Third Party Fundraisers for the next campaign.
- The information collected includes:
  - Contact,
  - Event,
  - Fundraising, and
  - Event outcome.
  - Contact information is stored electronically and is stored off site in a secure cloud based environment.
- Event outcome information is stored electronically on an excel spread sheet within the Christmas Bureau server and is backed up weekly and backup is stored off site.

#### (c) VOLUNTEER PROGRAM

##### Volunteers

- Contact information received from volunteers will only be used to contact said volunteer for the purpose of volunteer opportunities, appreciation, schedule reminders, newsletters and campaign and event information.
- Volunteer information collected includes: name, address, phone number(s), email, emergency contact, skill sets, volunteer schedules and years of service.
- Hard copies of volunteer application forms are shredded annually. Electronic data is stored off site in a secure cloud based environment.

##### Board of Directors and Committee Members

- Contact information received from board of director and committee members will only be used to contact said member for the purpose meeting information, board and committee work plans and items of discussion, knowledge philanthropy, obtaining advice and guidance, appreciation, newsletters and campaign and event information and updates.
- Board of directors and committee members' information collected includes: name, address, phone number(s), email, knowledge background and skill sets, date of birth and years of service.
- Electronic data is stored off site in a secure cloud based environment.

#### (d) EMPLOYEES

- Contact information received from employees will only be used for letter of employment, generation of paycheque, record of employment and T4 preparation, and for salary staff for the purchase of a benefits plan.
- Employee information collected includes: name, address, phone number(s), email, emergency contact name, phone number and relationship to employee, medical condition provided by employee. For salary staff RRSP account information is collected for the purpose of monthly contributions.
- Hard copy of employee information is kept in individual file folder in a secure filing

cabinet. Electronic data is stored in an accounting program on a dedicated workstation which is password protected; back up is taken off site.

### 3.0 LINKS TO OTHER WEBSITES

The Christmas Bureau website may contain links to other websites. However, once leaving the Christmas Bureau website, please note the Christmas Bureau does not have any control over privacy policies on those sites. Therefore, the Christmas Bureau cannot be responsible for any information provided while visiting third party websites.

### 4.0 BREACH OF PRIVACY POLICY

The Christmas Bureau is responsible for all personal information under its control, including any personal information that is transferred to third parties for processing, storage or other purposes. We respect the privacy of our donors, clients, partners, volunteers and supporters and are committed to protecting their privacy rights and personal information.

The Christmas Bureau has a **Privacy Officer** to whom our stakeholders are accountable for compliance with these privacy and security guidelines.

The Christmas Bureau has designated the Executive Director as the Privacy Officer. Any questions or concerns about the Christmas Bureau privacy practices can be directed to the Privacy Officer, in writing or by phone, with contact information and incident details.

#### **Privacy Officer**

Christmas Bureau of Edmonton  
#200, 4230 118 Ave NW  
Edmonton, AB T5W 1A4  
Phone: 780 454 6074 Fax: 780 454 6087  
e-mail: [privacy@christmasbureau.ca](mailto:privacy@christmasbureau.ca)

### 5.0 RESPONSIBILITIES

The Board of Directors is responsible for the overall development, enforcement and review of the privacy policy for the Christmas Bureau of Edmonton ensuring that updates adhere to governing legislation and best practises.

The Social Services Committee is responsible for the development, oversee and review of the privacy guidelines for the Client Program.

The Fund Development Committee is responsible for the development, oversee and review of the privacy guidelines for the Donor Program.

The Volunteer Committee is responsible for the development, oversee and review of the privacy guidelines for the Volunteer Program.

The Human Resources Committee is responsible for the development, oversee and review of the privacy guidelines for employees and project contracts.

At the Annual General Meeting, the Chairs of Social Services, Fund Development, Volunteer and Human Resources Committees shall report any breach of the Privacy Policy and the resolution thereof. If there are no breaches to report, the Chairs shall make a declaration that the Committee has adhered to and maintained the guidelines and standards of the Privacy Policy.

## 6.0 DEFINITIONS

### Applicant

Person who fills out a Christmas Bureau application form.

### Client

Person who receives services of the Christmas Bureau.

### Partner Agency

A partner agency is an agency that partners with the Christmas Bureau to provide services to its Clients.

### Referring Agency

A referring agency is an agency that provides client referrals to the Christmas Bureau to access the services of the Christmas Bureau.

### Services Provided by the Christmas Bureau

- Festive food hamper based on a hamper contents listing
- Gift certificates for a grocery store based on values table approved annually by Christmas Bureau Board of Directors.
- Toys for youth age 0 to 12 years. Toys provided by 630 CHED Santas Anonymous
- Teen gift card for youth age 13 to 17 years. The gift card is for a department store based on a value approved by Christmas Bureau Board of Directors, in conjunction with Edmonton Sun Adopt-A-Teen Program.

### Donor

A donor can be an individual or a corporation which voluntarily transfers property to the Christmas Bureau.

### Third Party Fundraisers

A third party fundraiser is an outside organization or individual that holds an event that raises funds and awareness for the Christmas Bureau.

### Volunteer, Committee Member

A volunteer or committee member is any individual who offers his or her skills, abilities and time to the Christmas Bureau without any financial remuneration.

### Board of Director

The board of directors is a body of elected or appointed members who jointly oversee the activities of the Christmas Bureau.

### Employee

An employee is any individual who works part-time or full-time and is paid for their services.

### Project Contract

A project contract is an independent short term project specific defined work on behalf of the Christmas Bureau.