

## **PLAN INTERNATIONAL CANADA INC.**

### **Policy Title: PRIVACY POLICY**

Date of Board Approval: March 10, 2009

#### **Our Commitment**

Plan Canada is an international, humanitarian, child-centered community development organization. We value and respect the privacy of individuals, including our employees, volunteers, donors, sponsors, and sponsored children and their families, and take reasonable steps to safeguard the personal information entrusted to us.

This privacy policy describes how Plan Canada collects, uses and discloses personal information. Plan Canada does not sell, barter or lease donor, sponsor or other fundraising lists.

#### **What type of information does this policy apply to?**

This policy applies to personal information of Plan Canada's employees, volunteers, donors, sponsors, and sponsored children and their families which is collected, used or disclosed by Plan Canada during the course of its activities. Personal information is information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization. Personal information includes information such as age, home address, home telephone number, date of birth, gender and ethnic origin.

#### **What personal information does Plan Canada collect and why?**

Plan Canada collects:

*Donor personal information*, which may include name, address, credit card and banking information, for purposes of (i) collecting donations or sponsorships, (ii) donor/ sponsor history, (iii) donor/ sponsor relationships, (iv) issuing receipts, (v) offering opportunities for further donation or sponsorships, (vi) offering volunteer opportunities, (vii) sending Plan Canada communications, and (viii) market research and determining how to engage donors.

*Employee and volunteer personal information*, which may include name, address, social insurance number, banking information, and employment history, for purposes of (i) establishing, managing and ending employment and volunteer relationships, (ii)

communicating with employees and volunteers; and (iii) vulnerable sector screening activities.

*Sponsored children personal information*, which may include names of the child and family members, personal circumstances, demographic information, social history, photographs of the child and family members and health information, for purposes of (i) assessing children and families for inclusion in programs and other activities, (ii) matching potential children with sponsors, (iii) communicating with donors and sponsors; and (v) media and public relations.

Plan Canada limits the amount and type of personal information collected to that which is reasonably necessary to fulfill the purposes identified. Personal information is collected by fair and lawful means.

### **How does Plan Canada collect, use and disclose personal information?**

Generally, an individual's knowledge and consent are required for the collection, use, or disclosure of personal information. Plan Canada makes efforts to advise individuals of the purposes for which their personal information will be used prior to collection. Individuals are also informed that they have the right to withdraw their consent at any time.

Personal information relating to children is collected with the consent of the child's parents and/or guardians or, if appropriate, with the consent of the child.

Plan Canada does not disclose personal information to third parties without the consent of the individual, unless permitted to do so by law. Personal information is not used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as permitted by law.

Certain personal information may be stored outside of Canada, for example donor names, numbers and credit card information. Personal information is retained only as long as necessary for the purposes for which it was collected.

### **What are Plan Canada's practices related to the accuracy of personal information?**

Plan Canada makes reasonable efforts to maintain the accuracy and completeness of personal information collected, used or disclosed by or on its behalf, as is necessary for the purposes for which it is used. Plan Canada does not routinely update personal information unless it is necessary.

### **How does Plan Canada safeguard personal information?**

Plan Canada has developed security safeguards and information practices appropriate to the sensitivity of the information to help protect personal information, regardless of its format, against loss, theft, unauthorized access, disclosure, copying, use, or modification.

Plan Canada uses the following methods to safeguard personal information:

- (a) Physical measures, for example, safe storage of records, locked filing cabinets and restricted access to offices;
- (b) Organizational measures, for example, limiting access to personal information to those who have a "need-to-know" this information in order to fulfill their duties; and
- (c) Technological measures, for example, the use of passwords and encryption.

### **How does Plan Canada promote openness with respect to its personal information practices?**

Plan Canada makes information about its personal information policies and practices generally available, including information about:

- The contact information of the Privacy Officer;
- The means of gaining access to and requesting correction of personal information held by Plan Canada; and
- A description of the type of personal information held by Plan Canada.

### **How does an individual access his or her personal information held by Plan Canada?**

When a written request for access to personal information is received, Plan Canada will inform the individual of the existence, use, and disclosure of his or her personal information. Plan Canada will usually provide the individual with access to his or her personal information. However, in some cases, access may be denied; for example, if providing access would disclose personal information about another individual. An individual may also challenge the accuracy and completeness of the information and request to have it amended, by submitting a written request to the Plan Canada's Privacy Officer.

Plan Canada will respond to an individual's written access request within a reasonable time. The requested information will be provided or made available in a form that is generally understandable, and reasons will be provided if the request is denied.

**Who should be contacted at Plan Canada regarding privacy?**

Plan Canada has designated a Privacy Officer to be responsible for Plan Canada's privacy policy. Our Privacy Officer may be reached at:

Privacy Officer  
Plan Canada  
1001-95 St. Clair Ave. W  
Toronto, ON M4V-1B5  
416-920-1654  
1-800-387-1418  
[info@plancanada.ca](mailto:info@plancanada.ca)

Plan Canada takes reasonable steps to see that its privacy policies are understood and implemented by all of Plan Canada's employees and volunteers.

Each employee and volunteer is responsible for his or her compliance with Plan Canada's policies and procedures relating to the personal information that they collect, use and disclose in the course of their duties.

Questions or concerns relating to Plan Canada's privacy practices can be addressed to Plan Canada's Privacy Officer. Plan Canada will respond to any requests for further information and will investigate any complaints or concerns.