



# PLAN INTERNATIONAL CANADA PRIVACY POLICY

Functional Area	Information Technology
Business Owner	Chief Privacy Officer
Version	1.0
Approval Body	Chief Operating Officer and Vice President, Information Technology
Effective Date	Oct 9, 2018
Review Date	This Policy shall be reviewed as deemed appropriate but no less frequently than 24 months following the last date of approval.

# INTRODUCTION

Plan International Canada (“Plan Canada” or “we” or “us” as the context requires), is committed to protecting the privacy and security of Personal Information under its control about its donors, sponsors, children, website visitors, employees, volunteers, interns and others whose Personal Information it collects.

This Policy sets out the minimum standards in relation to the collection, use, disclosure and maintenance of Personal Information by Plan Canada. This Policy will continue to evolve to reflect current best practices in privacy and data protection and changes in our organizational practices or legal and regulatory requirements. We encourage you to periodically check our website for updates to this Policy.

Personal Information means information relating to an individual which is personally identifiable, or for which it is reasonably foreseeable in the circumstances could be utilized, either alone or with other information to identify an individual. Personal Information does not include anonymous or aggregate information that cannot be tracked back to you personally. For example, we may use aggregate data to improve the quality and efficiency of our products and services, and to enhance our marketing efforts.

# STATEMENT OF PURPOSE

The purpose of this Policy is to ensure that:

- Plan Canada upholds the rights of all individuals that we engage with, especially children and their families, in respect of their Personal Information;
- any Personal Information to which this Policy applies is appropriately collected, used, disclosed and maintained; and
- only authorized individuals can access Personal Information.

To maintain appropriate standards of care in managing Personal Information, Plan Canada commits to the 10 principles outlined in the Canadian Standards Association’s *Model Code for the Protection of Personal Information* (CSA *Model Code*). The *Model Code*, which was recognized as a national standard for privacy protection in 1996, is used across Canada as the basis for personal information legislation, policies and procedures including the federal privacy law for the private sector, the *Personal Information Protection and Electronic Documents Act* (PIPEDA). The 10 principles of the *Model Code* are:

1. Accountability
2. Identifying Purposes
3. Consent
4. Limiting Collection
5. Limiting Use, Disclosure and Retention
6. Accuracy
7. Safeguards
8. Openness
9. Individual Access
10. Challenging Compliance

# BODY OF POLICY

## 1.1 PRINCIPLE 1: ACCOUNTABILITY

**Plan Canada accepts full responsibility for the Personal Information under our control. To that end, we have established internal procedures to comply with this Policy and have designated a Chief Privacy Officer to be accountable for compliance with the following principles.**

- 1.1 Responsibility for ensuring compliance with the provisions of this Policy rests with Plan Canada's Chief Privacy Officer. The Chief Privacy Officer may delegate responsibilities to one or more employees to oversee privacy compliance.
- 1.2 We use contractual and other commercially reasonable means to ensure that any third parties with access to Personal Information entrusted to us provide a comparable level of protection while such information is being processed by them.
- 1.3 This Policy is regularly reviewed to ensure that it reflects privacy best practices and current legislation.
- 1.4 In addition to this Policy, we have:
  - Developed and implemented practices to protect Personal Information;
  - Established procedures to receive and respond to privacy inquiries or complaints, as well as manage privacy breaches; and
  - Established a privacy training and awareness program for Plan Canada staff that highlights Personal Information protection responsibilities.

## 1.2 PRINCIPLE 2: IDENTIFYING PURPOSES

**Plan Canada collects Personal Information for specific purposes and identifies these purposes at or before the time the information is collected.**

- 2.1 We document the purposes for which we collect Personal Information for each of our data holdings.
- 2.2 At Plan Canada, Personal Information is collected for purposes such as the following:
  - To understand the needs of individuals and respond to requests for information, products or services;
  - To verify an individual's identity;
  - To complete a financial transaction such as the sponsorship of a child;
  - To provide appropriate levels of service following completion of a transaction, such as a change in banking or credit card information, or a change in sponsorship or donations;
  - To establish relationships, provide support, as well as communicate about Plan Canada updates, marketing initiatives, or other Plan Canada news;
  - To conduct satisfaction surveys;
  - To administer employees, volunteers, speakers and any associated activities; and
  - To meet legal or regulatory requirements imposed upon Plan Canada from time to time.

2.3 Unless otherwise permitted or required by law, we shall make reasonable efforts to only collect and use Personal Information that is necessary for the purposes identified in section 2.2.

2.4 Upon request, representatives of Plan Canada collecting Personal Information shall explain the purposes for which such information will be used, or refer the requestor to another representative who can explain the purposes.

[CLICK HERE](#) to learn about our **Website Practices**.

### **PRINCIPLE 3: CONSENT**

*Plan obtains informed consent for the collection, use or disclosure of Personal Information, except where inappropriate.*

3.1 Unless otherwise permitted or required by law, Plan Canada shall not use or disclose existing Personal Information for any new purpose that is not outlined in section 2.2 without first identifying and documenting the new purpose and obtaining the consent of the individual.

3.2 Consent can be obtained in person, by phone, by mail, or via the Internet (e.g., ticking a box). Consent is only implied or assumed if the collection, use or disclosure of Personal Information is obvious based on the individual's actions or inactions, and the Personal Information is non-sensitive in nature and context.

3.3 Plan Canada will only require individuals to consent to the collection, use or disclosure of Personal Information as a condition to the supply of a product or service if such collection, use or disclosure is required to fulfil the identified purposes, e.g., supplying a credit card number to process a sponsorship application.

3.4 Your provision of Personal Information to Plan Canada means that you agree to our collection, use and disclosure of your Personal Information in accordance with this Privacy Policy. If you do not agree with these terms, please do not provide your Personal Information to us.

3.5 If an individual provides Plan Canada or its service providers with Personal Information about another person, it is their responsibility to obtain consent from such person to enable us to collect, use and disclose such information for the purposes set forth in this Policy.

3.6 An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. For example, you are always given the ability to opt-out of receiving promotional electronic messages from Plan Canada by using the available "unsubscribe" link. We will inform customers of the implications of withdrawing consent, as we may be limited or unable to provide information, products or services as a result.

3.7 In order to protect children involved in our activities, we will ensure that the child's parent(s) and/or guardian(s) provide consent on behalf of the child, where appropriate, and in accordance with our *Child Protection Policy and Procedures*.

3.8 In certain cases, we may have Personal Information in our records about individuals who are now resident in the European Union. In such cases, we have taken steps to ensure that we are compliant with any obligations that we may have under the *General Data Protection Regulation (GDPR)* (EU 2016/679).

## **PRINCIPLE 4: LIMITING COLLECTION**

***Plan Canada limits the collection of Personal Information to that which is necessary for purposes identified by Plan. Personal Information is collected by fair and lawful means.***

4.1 Every Plan Canada department or business unit is responsible for ensuring that all information collected is limited, both in amount and type, to what is needed to fulfill the identified purposes.

4.2 In most cases, Personal Information is collected directly from the individual who it is about, for example through applications and supporting documentation provided.

4.3 Only with the authorization of the individual or where permitted or required by law, Plan Canada may also collect Personal Information from references, financial institutions, credit reporting agencies or other third parties.

## **PRINCIPLE 5: LIMITING USE, DISCLOSURE AND RETENTION**

***Plan Canada does not use or disclose Personal Information for purposes other than those for which it is collected (as outlined in section 2.2), except with the consent of the individual or as required by law. Plan Canada retains Personal Information only as long as necessary for the fulfilment of those purposes, or as required by law.***

5.1 There are circumstances where a disclosure without consent is justified or permitted, for example in the context of a legal investigation or a request from law enforcement authorities, or where we believe, upon reasonable grounds, that the disclosure is necessary to protect the rights or safety of an identifiable person or group.

5.2 Your information may also be shared with third party service providers who assist us in establishing, managing or maintaining our relationship with you. These organizations, such as banking institutions and credit agencies, as well as contractors who perform various functions to provide or assist in the delivery of service, commit to safeguarding your Personal Information. In these cases, contractual agreements are in place that specify the reason for collection and use, identify the service provider's privacy responsibilities related to the services provided, and ensure secure transfer of the data. We ensure that these agreements are in place with these service providers before any access to granted to your Personal Information.

5.3 Your Personal Information may be transferred to a foreign jurisdiction to be processed or stored by Plan Canada or its service providers, including data hosting providers. Such information may be provided to law enforcement or national security authorities of that jurisdiction upon request, in order to comply with foreign laws.

5.4 We do not and will never sell any Personal Information to third parties for marketing or any other commercial purposes.

5.5 Personal Information may be shared between our affiliates or related companies, such as the Plan International Head Office in England, for internal audit, management, billing, promotional or administrative purposes including defending and bringing legal actions.

5.6 Plan Canada retains Personal Information only for as long as it is deemed necessary, to fulfil the purposes identified in section 2.2 or as required by law. The retention period may extend beyond your relationship with us for legitimate business reasons.

5.7 Personal Information that is no longer necessary or relevant for the identified purposes or no longer required to be retained by law, shall be securely destroyed, erased or made anonymous.

## **PRINCIPLE 6: ACCURACY**

*Plan Canada makes reasonable efforts to keep Personal Information as accurate, complete and up-to-date as is necessary to fulfil the purposes for which the information is to be used.*

6.1 We rely upon the individuals who provide us with their Personal Information to ensure its accuracy and completeness.

6.2 Plan Canada has established internal procedures to preserve the integrity of the Personal Information received by individuals in accordance with reasonable commercial standards.

6.3 We will update our customer's Personal Information as and when necessary to fulfil the identified purposes, or upon notification by the individual.

## **PRINCIPLE 7: SECURITY SAFEGUARDS**

*Plan Canada protects Personal Information with security safeguards appropriate to the sensitivity of the information.*

7.1 We protect Personal Information against a variety of risks, such as loss, theft, unauthorized access, unauthorized disclosure, unauthorized copying, unauthorized use, unauthorized modification or unauthorized destruction by using appropriate security measures.

7.2 These safeguards involve physical, organizational and technical measures including:

- Security card access to our premises;
- Restrictions on employee access to files on a "need to know" basis;
- Confidentiality undertakings by all employees;
- Locking up Personal Information as necessary, such that it is not left unattended in plain view;
- Firewalls, anti-malware detection software, strong passwords and software solutions for technical security (including ensuring that information is only collected on Plan websites via a secure, 256-bit encrypted Secure Socket Layer session); and
- Regular reviews of privacy compliance initiatives.

7.3 All of our employees with access to Personal Information are required, as a condition of employment, to safeguard Personal Information viewed or handled by the employee. Employees sign confidentiality agreements and must complete privacy awareness training.

## **PRINCIPLE 8: OPENNESS**

*Plan Canada makes readily available specific information about its privacy management policies and practices to individuals upon request.*

8.1 This information includes:

- a) the name, title and address of the Chief Privacy Officer to whom inquiries or complaints can be forwarded;
- b) the means of gaining access to Personal Information held by us;
- c) a description of the type of Personal Information held by us, including a general account of its use and disclosure; and

- d) a copy of this Policy or other information that explains our information handling practices.

8.2. We make information available to help individuals exercise choices regarding the use and disclosure of their Personal Information upon request. Our staff are able to answer inquiries about our information handling practices and appropriately refer unanswered questions or privacy complaints to Plan's Chief Privacy Officer.

## ***PRINCIPLE 9: INDIVIDUAL ACCESS***

***Plan Canada informs individuals of the existence, use and disclosure of their Personal Information upon request, and gives the individual access to their information. Individuals are given the opportunity to challenge the accuracy and completeness of their information and have it amended as appropriate.***

9.1 Upon written request, we will afford customers a reasonable opportunity to review their Personal Information as contained in our files, whether in electronic or in paper form. The written request must provide sufficient detail so that we can properly and efficiently locate the records requested.

9.2 Upon request, we will provide an account of the use and disclosure of the individual's Personal Information and, where reasonably possible, will state the source of the information.

9.3 In order to safeguard and prevent fraudulent access to Personal Information, we will take reasonable steps to verify the identity of a requestor, or their legally authorized representative, before granting them with access to their file.

9.4 We will respond to access requests in a timely manner, and in accordance with the timeframe prescribed by relevant legislation.

9.5 Individuals will be provided with any assistance required to access or understand their Personal Information, including clarifying exactly what they are looking for or receiving in response to their access request.

9.6 Depending on the amount of information requested, there may be a nominal fee charged to cover any costs associated with responding to the request. We will inform the individual of any such fees prior to fulfilling the access request.

9.7 We shall promptly correct or complete any Personal Information that is successfully demonstrated by the individual, or their legally authorized representative, to be inaccurate or incomplete. If we do not agree with the individual regarding a correction or completeness of information, this shall be noted in the individual's file. Where appropriate, we shall transmit to third parties having access to the disputed Personal Information, any disagreement that Plan has with the individual about the accuracy of the information.

9.8 An individual's right to access or correct personal information is subject to applicable legal restrictions. If we do not have custody of the Personal Information requested or must decline to provide an individual with access to their Personal Information for legal, regulatory or other reasons, an explanation will be provided when permitted.

## **PRINCIPLE 10: CHALLENGING COMPLIANCE**

*An individual shall address a challenge concerning Plan Canada's compliance with the principles set out in this Privacy Policy to the Chief Privacy Officer.*

10.1 We have procedures in place to receive, investigate, respond to and track concerns or complaints about our management of Personal Information.

10.2 Upon conclusion of a complaint investigation, the Chief Privacy Officer will inform the complainant of:

- a) the results of the investigation; and
- b) any appropriate remedy or corrective action we will undertake to address the complaint, including if necessary, amending Plan's policies and procedures.

# **APPLICABILITY AND SCOPE**

This Policy applies to Plan Canada's employees, Directors, Officers, students, volunteers, interns of other associates engaged in Plan Canada business.

# **RESPONSIBILITIES**

The Chief Privacy Officer is responsible for ensuring compliance with this Policy.

Questions or concerns relating to Plan Canada's Privacy Policy and/or our treatment of Personal Information should be directed to:

Plan International Canada Inc  
245 Eglinton Ave. East, Suite 300, Toronto, ON M4P 0B3

Attention: Chief Privacy Officer  
Phone #: 1-800-387-1418  
Email: [privacyoffice@plancanada.ca](mailto:privacyoffice@plancanada.ca)

# RELATED DOCUMENTS

- [Employee and Associate Privacy Policy](#)
- [Privacy Access, Inquiries and Complaints Procedure](#)
- [Privacy Training and Awareness Procedure](#)
- [Privacy and Security Training Acknowledgement Form](#)
- [Breach Management Procedure \(internal document\)](#)
- [Confidentiality Agreement](#)
- [Privacy Breach Reporting Form](#)

## APPENDIX: WEBSITE PRACTICES

### 1. Usage tracking

Our websites may automatically record some general information about your visit in order for Plan to engage in web statistical analysis using a web analytics service. We want to make sure our sites are useful to visitors, and ensure we engage in targeted advertising responsibly, such that customers receive information that is relevant to their needs and interests. User information gathered may include the:

- Internet domain for your Internet service provider, such as “company.com” or “service.ca” and the IP address of the computer you are using to access Plan’s website;
- Type of browser you are using, such as Internet Explorer, Firefox or Chrome;
- Type of operating system you are using such as Windows or Macintosh;
- Date and time of the visit to our site, the pages of our site that were visited, and the address of the previous website you were visiting if you linked to us from another website
- Age category, gender, and affinity interests as determined by demographic and interest reports available through Google Analytics.

We make no effort to personally identify you based on your visit to our site. If you wish, you may opt out of being tracked by a web analytics service by disabling or refusing cookies; by disabling JavaScript within your browser; or by using the web analytics organization’s opt out service, for example, for Google Analytics, get the [Google Analytics Opt-Out Browser Add-On](#).

Data collected for web analytics purposes may be processed in any country where the web analytics organization used by Plan operates servers, and thus may be subject to the governing legislation of that country.

### 2. Cookies

We also use "cookies" that identify you as a return visitor and which can help us tailor information to suit your individual preferences. A cookie is a small text file that a website can send to your browser, which may then store the cookie on your hard drive. The goal is to save you time next time you visit, provide you with a more meaningful visit, and measure website activity. Cookies in and of themselves cannot be used to reveal your identity. Many browsers, however, allow you to disable cookie collection if you wish, or inform you when a cookie is being stored on your hard drive.

### 3. Targeted advertising:

As you interact with Plan’s websites, third party advertising partners may use cookies, tracking pixels, web beacons and similar technologies to identify you as a visitor to our websites, and present you with targeted ads to help promote Plan. You can opt-out of the use of your information for select ad targeting by visiting this site: <http://youradchoices.ca/choices>, and also by setting up “Do Not Track” options available through your browser. We also occasionally provide your personal information to trusted advertising partners for the purpose of presenting you with targeted ads on behalf of Plan. You can request that your personal information not be shared with our advertising partners by contacting our Chief Privacy Officer at the contact info provided below.

#### 4. OTHER IMPORTANT NOTES REGARDING OUR WEB PRACTICES

##### *a. EXTERNAL LINKS*

Plan provides links to other websites which we believe may be of interest to you. We are not responsible for the privacy practices of these other sites. We encourage you to read the privacy statements of each and every website that requests personal information from you.

##### *b. THIRD PARTY SOCIAL MEDIA*

Plan's use of social media serves as an extension of its presence on the Internet. Social media account(s) are public and are not hosted on Plan's servers. Users who choose to interact with Plan via social media should read the terms of service and privacy policies of these third-party service providers and those of any applications used to access them.

We may offer you the opportunity to engage with our content through third party social networking websites and applications. When you engage with our content this way, you may allow us to have access to certain information associated with your social media account (e.g. name, username, e-mail address, picture) to deliver the content or as part of the website or application. We may use this information to confirm your identity and to personalize your experience.

##### *c. SPECIAL NOTE FOR PARENTS*

Plan websites are not directed at children, and we request that children under the age of 13 not provide personal information through our sites.

##### *d. SECURITY*

No method of transmitting or storing data is 100% secure. As a result, although we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us through or in connection with Plan websites. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), you must immediately notify us of the problem in order for Plan to resolve the issue in a timely manner. Also keep in mind that e-mail is not a secure form of communication so never send sensitive personal information to us via e-mail.