

## Fundraising Policy

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| <b>Policy: Donor Privacy</b>  | <b>Number: AS-FUND-10</b> |
| <b>Effective Date: March 2023</b><br><b>Review Date: October 2023</b> | <b>Pages:3</b>            |

### Policy Statement:

The privacy and confidentiality of all personal information must be maintained at the Alzheimer Society of Toronto (the “Society”).

### Purpose:

To meet the requirements of The *Personal Information Protection and Electronic Documents Act* (PIPEDA). *To protect the privacy of personal information of employees, members, donors and other stakeholders.*

### Definitions:

Personal Information is any information that can be used to distinguish, identify or contact a specific individual. This information can include an individual’s opinions or beliefs, as well as facts about, or related to, the individual.

Privacy Officer is accountable for the organization’s compliance with all privacy laws. Also, the Privacy Officer will train employees on the organization’s privacy policy, develop a procedure for handling requests for access to personal information and for handling complaints.

Donor Lists are any compilation of donor contact information in paper or electronic format.

### Procedures:

All staff will:

1. Identify the following before collecting personal information:
  - The purpose of collecting the personal information
  - What the information will be used for
  - To whom information is going to be disclosed.
2. Provide positive or “opt-in” consent when collecting sensitive personal information. Provide negative or “opt-out” consent when collecting non-sensitive information that is for internal purposes or for third parties (ensure third parties are identified when the information is collected).
3. Maintain personal information in an accurate, complete and up-to-date manner.

4. Protect personal information by using appropriate safeguards, including those which guard against theft, unauthorized access, disclosure, copying, modification, etc. Safeguards may include physical protection (the use of locked cabinets), and technological measures such as passwords and/or encryption.
5. Inform individuals of the existence, use and disclosure of his or her personal information and give access to it so he or she can challenge the accuracy or completeness of the information.
6. Retain personal information only as long as necessary.

The Fund Development Personnel or designate will:

1. Include the following reference to the Privacy Policy on all pledge and donation forms: The Alzheimer Society is committed to protecting the privacy and confidentiality of your personal information. For complete details on our privacy policy, please go to [www.alz.to](http://www.alz.to).

### **Donor Lists**

The Senior Leader of the Society will:

1. Ensure the Alzheimer Society has adopted the *Ethical Fundraising and Financial Accountability Code* and the *Donor Bill of Rights*, and posted them in communications or promotional materials such as newsletters, website, annual report, brochures.
2. Educate board, staff and volunteers about the importance of donor privacy and ensure they are aware of and understand the privacy and confidentiality policies of the Alzheimer Society.
3. Ensure board, staff and volunteers who have access to donor information sign a Confidentiality Agreement.
4. Communicate the privacy policy to current and prospective donors.
5. Ensure that third-parties (such as contracted fundraising professionals hired to collaborate with the Society) sign confidentiality agreements, and adhere to all current privacy legislation, rules and regulations.

### **Policy Review**

The most Senior Leader at the Society, or their designate will review this policy annually. If there are legislated changes required, these changes will be made as close as possible to the effective date of the legislative change.

**Sample Privacy Agreement**

I \_\_\_\_\_ (name) acknowledge and agree that I will have access to a broad range of information held on the donor database system concerning Alzheimer Society Toronto supporters, clients and volunteers which is referred to as “Confidential Information”, and acknowledge and agree to the following:

I will not, directly or indirectly, disclose or use at any time or for any purpose, save in the execution of the specific duties for which I have been hired, Confidential Information without first securing the written consent of the Alzheimer Society Chief Privacy Officer to disclose or use; and

In the provision of its services, any and all materials or data from all sources including eTapestry, Fundmaster and Cornerstone Response Management which I may conceive or make and relating or pertaining in any way to the fundraising programs of Alzheimer Society shall be the sole and exclusive property of The Alzheimer Society and I will treat all materials and data thereof as Confidential Information.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_

\_\_\_\_\_  
Witness

\_\_\_\_\_  
Signature

**Please return this signed and witnessed agreement to:**