



Privacy Policy

Revision History

Version	Effective Date	Author	Comment
1.0	May 23, 2018	K. Vilner	New Document
2.0	August 21, 2025	C. Koenen	Revised Document

Reviews and Approvals

Prepared by	Date
K. Vilner, Privacy Officer	
Reviewed by	Date
C. Koenen, Director, Marketing and Communications	August 21, 2025
Approved by	Date

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1. Collection of Personal Information

The Alzheimer Society of Toronto is committed to identifying the purposes for which Personal Information is collected at or before the time the information is collected, and to documenting the purposes for which Personal Information is collected. The Personal Information we may collect from you includes:

- Contact information, such as your name, address, telephone number and email address;
- Donation information such as date of gift, amount of gift, the campaign you contributed to, and name of your spouse or partner if it was a joint gift;
- Financial information such as your payment methods and preferences, billing and banking information including credit card number and expiry date or chequing account transit numbers. Online financial transactions such as donations and event registrations, are processed using secure web transactions;
- Other Personal Information may be collected to be used for purposes that an individual would consider reasonable in the circumstances. For example, if you have demonstrated an interest in receiving information about Alzheimer's disease or a related dementia, or participating in fundraising or other related events, we may send you information regarding other fundraising programs and services;
- On a voluntary basis, Personal Information such as your gender, language preference, motivations for supporting the Alzheimer Society of Toronto, and preferred method of contact is requested when donations are made; and
- On a voluntary basis, Personal Information including acknowledging if you are a person living with Alzheimer's disease or a related dementia, or if you are a caregiver or family member to a person with Alzheimer's disease or other related dementia may be requested.

When you provide us with your Personal Information we assume you consent to our collecting it and using it for the specific purposes identified at the time of the collection or in this Privacy Policy. We do not collect Personal Information indiscriminately and we do not collect any information about you unless you provide it to us willingly.

2. Use of Personal Information

The above noted Personal Information we collect from you may be used by the Alzheimer Society of Toronto and Federation Partners for the following limited purposes:

- To respond to requests for services and information;
- To inform you about activities, special events, and volunteer opportunities;
- To assist in developing new programs, events, and services;
- For fundraising;
- To process donations and issue tax receipts;
- To provide donation recipients with summary or aggregate information about our donations, programs and services;
- For internal research purposes;
- To develop advertising based on donor preferences;
- For public education purposes;
- For advocacy purposes;
- To save your credentials to the event calendar on our webpage;
- For voluntary surveys when donations are made to help design profiles of the donor base to aid with creating of messaging and providing content, as well as to refine targeted marketing campaigns to prospective donors;
- To cross-reference Personal Information between and amongst all Federation Partners; and
- To provide newsletters, emails, information and updates.

Some of the Personal Information the Alzheimer Society of Toronto collects is needed in order to satisfy the requirements of Canada Revenue Agency (CRA). We may provide further details to you about Personal Information that we collect or uses that we may make of your Personal Information either at the time we ask you to provide that information or through changes to this Privacy Policy. Although you may choose to not share your Personal Information with the Alzheimer Society of Toronto, if you choose not to do so, your involvement in Alzheimer Society of Toronto activities and the Alzheimer Society of Toronto community may be limited.

If at one time you provided your Personal Information for any of the above reasons, or any additional reason, you may unsubscribe by contacting the Privacy Compliance Officer whose information can be found at the bottom of this Privacy Policy.

3. Disclosure of Personal Information

By providing your Personal Information to the Alzheimer Society of Toronto, you have confirmed your trust in us. We are honored by this and take pride in serving you. The Alzheimer Society of Toronto may share your Personal Information in the following limited ways. If you would like to withdraw your consent to the disclosure of the Personal Information, please contact our Chief Privacy Compliance Officer whose contact information can be found at the bottom of this Privacy Policy. Please note that the withdrawal of your consent may impact on the Alzheimer Society of Toronto's ability to serve you and to maintain your relationship with the Alzheimer Society of Toronto.

- Personal Information may be shared as necessary between and amongst all Federation Partners for the purposes stated within this Privacy Policy or disclosed at the time of collection;
- As part of our fundraising initiatives, Personal Information may be shared with other registered charities;
- Personal Information is shared as necessary with auditors for the Alzheimer Society of Toronto's annual audit;
- Banking information is shared with the Alzheimer Society of Toronto's banking institution to process donations;
- Personal Information may be shared with contracted third parties during the preparation of fundraising campaigns and used exclusively by them for the purposes of those specific campaigns;
- The Alzheimer Society of Toronto may share your Personal Information to contracted third party service providers or agents who provide services to or on behalf of the Alzheimer Society of Toronto such as:
 - Hosting, data management and storage services;
 - Market analyses, and retention services; and
 - Donation processing and receipt production services.

The Alzheimer Society of Toronto or third-party service providers may use servers for such purposes located in the United States or another foreign country. The Personal Information of an individual may be processed and stored in the United States or such other foreign country, and the governments, courts or law enforcement or regulatory agencies of that country may be able to obtain disclosure of through the laws of the foreign country.

Personal Information may also be disclosed without your consent if required by law or by order or requirement of a court, administrative agency or governmental tribunal; where the Society believes, upon reasonable grounds, that it is necessary to protect the rights, privacy, safety, or property of an identifiable person or group.

The Alzheimer Society of Toronto remains responsible for Personal Information in its possession or custody, including information that the Alzheimer Society of Toronto transfers to a third party for processing or for storage. As such, the Alzheimer Society of Toronto enters into confidentiality or

contractual agreements with third parties which are engaged to perform services on its behalf and to whom the Alzheimer Society of Toronto transfers Personal Information for processing or storage requiring them to provide a level of security comparable to that provided under its Privacy Policy.

4. Storing, Processing and Securing Personal Information

The Alzheimer Society of Toronto stores and maintains Personal Information in conformity with the requirements of the *Personal Information Protection and Electronic Documents Act* and the Model Code for the Protection of Personal Information created and approved by the Canadian Standards Association. When we use third party service providers for storing or processing of Personal Information, we use contractual or other means to ensure that your Personal Information is protected. In some cases, third party service providers may store or transfer Personal Information in or to countries where compliance with Canadian privacy laws cannot always be guaranteed. Please rest assured that the Alzheimer Society of Toronto makes reasonable efforts to contract only with trustworthy service providers who are committed to protecting the privacy of your Personal Information.

We use a variety of secure means to store your Personal Information. These include:

- The Alzheimer Society of Toronto uses technological security measures, including passwords and encryption, to prevent unauthorized access to financial and other Personal Information stored on computer systems;
- Locked cabinets in secure areas are used to store hard copies of financial information;
- Third party providers, agents or vendors are used to provide services to or on behalf of the Alzheimer Society of Toronto such as secure data storage, data hosting, and data management.

Either the Alzheimer Society of Toronto or such third party service provider may use servers for such purposes located in the United States or another foreign country. The Personal Information of an individual may be processed and stored in the United States or such other foreign country, and the governments, courts or law enforcement or regulatory agencies of that country may be able to obtain disclosure of Personal Information through the laws of the foreign country. We make every effort to ensure that data is stored within Canada.

Relevant staff members of the Alzheimer Society of Toronto have access to your Personal Information as required, and only as reasonably necessary on a need-to-know basis to fulfill the purposes identified upon the collection of the information, or for the purposes stated in this Privacy Policy, for example to organize fundraising campaigns, process donations, or fulfill marketing and communication purposes.

5. Website Use

The Alzheimer Society of Toronto may collect and use an individual's IP address, and date and time that the individual accessed our website, made a donation or engaged with our marketing materials to help identify the individual, gather broad demographic information about users of the website, diagnose problems with the Alzheimer Society of Toronto's systems, offer insights into marketing activities and administer the Alzheimer Society of Toronto website.

Depending on an individual's browser settings, the Alzheimer Society of Toronto website may use cookies. A cookie is a tiny element of data that a website can send to an individual's browser, which may then be stored on their hard drive so the website can recognize them when the individual returns to the particular website. We may use cookies to deliver content according to the individual's preferences. If an individual's browser settings do not accept cookies from our website, they may not be able to take advantage of all of the features of the website.

We use Fundraise Up, Feather and "Google Analytics" to collect information about use of the Alzheimer Society of Toronto website and online donation activity. Google Analytics is a web analytics service that uses cookies to track information about the use of the website such as how often users visit the sites, what pages they visit when they do so, and what other websites they used prior to coming to the Alzheimer Society of Toronto website. This information is used to improve the Alzheimer Society of Toronto website. Google Analytics only collects the IP addresses assigned to you on the date you visit the site, rather than your name or other identifying information about an individual. Information collected through the use of Google Analytics is not combined with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to the Alzheimer Society of Toronto website is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. Google Analytics stores information on servers in the United States and the governments, courts or law enforcement, or regulatory agencies of the United States may be able to obtain disclosure of Personal Information through the laws of the United States. You can prevent Google Analytics from recognizing you on return visits to the Alzheimer Society of Toronto website by disabling cookies on your browser. If you choose, you can opt out by turning off cookies in the preferences settings in your web browser. For more information on Google Analytics, please visit: <http://www.google.com/analytics/>. For more information about Fundraise Up visit: <https://fundraiseup.com/> For more information about Feather visit: <https://www.feathr.co/>

6. The Model Code for the Protection of Personal Information

The Alzheimer Society of Toronto applies the ten principles of the Model Code for the Protection of Personal Information when collecting, using or disclosing your Personal Information:

6.1. ACCOUNTABILITY

The Alzheimer Society of Toronto is responsible for the Personal Information collected and maintained by it and which is under its control. In order to fulfill this responsibility, we have designated a Chief Privacy Compliance Officer whose contact information is available at the bottom of this document, to be responsible for the day-to-day care and control of Personal Information. We have taken the following measures to ensure compliance with this Privacy Policy:

- a. Developing procedures to protect Personal Information;
- b. Developing procedures to receive and respond to complaints and inquiries;
- c. Training our staff about our policies and practices respecting Personal Information; and
- d. Developing and distributing information to our staff and the general public explaining our policies and procedures respecting Personal Information.

6.2. IDENTIFYING PURPOSES

The Alzheimer Society of Toronto is committed to openness to you regarding its collection and use of Personal Information, as discussed above. To demonstrate this openness, we require the consent of individuals prior to using their Personal Information for any purpose other than that for which it was originally collected or stated within this Privacy Policy. Similarly, if any individuals wish to be advised of the Personal Information we have related to them, they can contact us at the address set out below.

6.3. CONSENT

The Alzheimer Society of Toronto is committed to ensuring that you are aware of how your Personal Information is used. We are dedicated to obtaining the informed consent of individuals who provide us with their Personal Information. If your Personal Information is to be used for a new purpose not previously identified at the time of collection or in this Privacy Policy, consent for that new purpose would be obtained. To this end, all our employees, personnel or agents are instructed to provide

information about how Personal Information is used by us to all interested individuals who inquire, as well as obtain the informed consent of those who provide their Personal Information. As well, we may periodically request written confirmation from you to ensure that the Personal Information collected and maintained by us is up-to-date and accurate. We also may ensure that we have your continuing consent to use and retain your Personal Information. The Alzheimer Society of Toronto will not disclose your Personal Information, without your consent. It will only do so if required by law or in the good faith belief that such action is necessary to:

- a. conform to obligations imposed by law or statute;
- b. meet an emergency need; and/or
- c. as required pursuant to a criminal investigation.

You may withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting the Privacy Compliance Officer. Please note that the withdrawal of your consent may impact on the Alzheimer Society of Toronto's ability to serve you and to maintain your relationship with the Alzheimer Society of Toronto.

6.4. LIMITING COLLECTION

The Alzheimer Society of Toronto restricts the collection of Personal Information only to that information that is necessary for the limited purposes noted above. We are committed to collecting Personal Information in a fair, open and lawful manner. For this reason, the Alzheimer Society of Toronto does not indiscriminately collect Personal Information. We collect Personal Information to fulfill the above-noted purposes only, and for no other purposes.

6.5. LIMITING USE, DISCLOSURE AND RETENTION

The Alzheimer Society of Toronto does not use Personal Information for purposes other than those for which it was originally collected or stated in this Privacy Policy, unless it has first obtained the consent of the person from whom such information was received. We retain Personal Information only for as long as it is needed and only for the fulfillment of the purposes for which it was originally collected, or for as long as legally required. Once Personal Information is no longer needed, it is shredded and disposed of. When disposing of or destroying Personal Information which is no longer needed, the Alzheimer Society of Toronto ensures the appropriate measures are taken regarding the disposal or destruction so as to prevent unauthorized parties from gaining access to the information. The Alzheimer Society of Toronto ensures that any third party service providers are following the

Alzheimer Society of Toronto's policies regarding the retention and destruction of Personal Information.

6.6. ACCURACY

The Alzheimer Society of Toronto is committed to maintaining accurate, complete and up-to-date Personal Information. If you are aware of changes to the Personal Information you have given to us, simply inform us of the changes and we will update our records accordingly. You may check and correct your Personal Information by contacting the Alzheimer Society of Toronto and the Privacy Compliance Officer assigned to oversee the day-to-day care and control of Personal Information by writing or emailing your request to the address set out below.

6.7. SAFEGUARDS

The Alzheimer Society of Toronto has developed and implemented security safeguards appropriate to the sensitivity of the Personal Information kept by us. We also ensure that any of our employees who deal with Personal Information are properly trained and are aware of the necessary and appropriate measures required to protect Personal Information. Any Personal Information kept by us is disposed of or destroyed once it is no longer needed to meet the purposes for which it was collected.

6.8. OPENNESS

The Alzheimer Society of Toronto makes information about its policies and practices respecting the collection and maintenance of Personal Information available to all interested parties. We are pleased to answer any questions that you may have regarding the collection and maintenance of Personal Information. Please forward any questions in writing or email to the address set out below.

6.9. INDIVIDUAL ACCESS

You can also request access to your Personal Information held by us. However, we reserve the right to confirm the identity of the person seeking access to Personal Information before complying with any access requests. Please forward your access request in writing or email to the address set out below.

6.10. CHALLENGING COMPLIANCE

As noted above, the Alzheimer Society of Toronto has designated an official who is responsible for the day-to-day care and control of Personal Information. This official will receive and respond to all information requests regarding our privacy policies or about your Personal Information under our care and control. We investigate all complaints received by us and will respond in writing in a timely manner. If any complaint is found to be justified, then we will take appropriate measures to resolve the matter to the satisfaction of the complainant.

7. Additional Information

If you would like more information about our policies, or if you would like to access or correct the Personal Information we have about you in our records, then please contact our Privacy Officer by email or in writing, as provided below:

ATTENTION: PRIVACY OFFICER
The Alzheimer Society of Toronto
20 Eglinton Avenue West, 16th floor
Toronto, ON M4R 1K8
info@alz.to