

TORONTO CITY MISSION PRIVACY POLICY

Toronto City Mission (“TCM”) recognizes the importance of privacy and the sensitivity of personal information. TCM is committed to protecting any personal information it holds. This privacy policy outlines who at TCM manages your personal information and safeguards your privacy.

1. Accountability

1.1 The Office Manager is hereby appointed as the personal information compliance officer (the “officer”).

1.2 All persons, whether employees, volunteers, or board or committee members who collect, process, or use personal information shall be accountable for such information to the officer.

1.3 This policy shall be made available upon request.

1.4 Any personal information transferred to a third party for processing is subject to this policy. The officer shall use contractual or other appropriate means to protect personal information at a level comparable to this policy while a third party is processing this information.

1.5 Personal information to be collected, retained, or used by TCM shall be done so only after the officer gives written approval. This information shall be secured according to the officer’s instructions.

1.6 Any person who believes that TCM uses personal information collected, retained, or used for purposes other than those that person explicitly approved may contact the officer to register a complaint or to make any related inquiry.

The officer shall develop procedures to receive and respond to complaints or inquiries about the policies and practices regarding the handling of personal information. The compliance procedures shall be easily accessible and simple to use.

The officer shall inform individuals inquiring about lodging complaints that relevant complaint procedures exist.

1.7 Upon receiving a complaint from any person regarding the collection, retention, or use of personal information, the officer shall promptly investigate the complaint. If a complaint is found to be justified, the officer shall take appropriate measures, including, if necessary, amending the policies and practices and shall notify the person who complained about his/her findings and corrective action taken, if any.

1.8 Upon receiving the response from the officer, the person who filed the complaint may, if he/she is not satisfied, appeal to the TCM board of directors to review and determine the disposition of the complaint at issue.

1.9 The determination of the board of directors shall be final and the officer shall abide by and implement any of its recommendations. When appropriate, the complaint shall be transmitted to third parties having access to the information in question. [If the complainant is not satisfied with the response received, the Privacy Commissioner of Canada can be reached at 112 Kent Street, Ottawa, Ontario K1A 1H3.]

1.10 The officer shall communicate and explain this policy and give training regarding it to all employees and volunteers who might be in a position to collect, retain, or use personal information.

2. Identifying Purposes

2.1 The officer shall document the purpose for which personal information is collected.

2.2 The officer shall determine the information that will be needed to fulfill the purposes for which the information is to be collected in order to comply with the limiting collection principle below in paragraph 4.

2.3 The officer shall ensure that the purpose of collecting the information is specified at or before the time of collecting the personal information from an individual.

2.4 The officer shall ensure that the information collected will not be used for any other purpose before obtaining the individual's approval, unless the new purpose is required by law.

2.5 The officer shall ensure that a person collecting personal information will be able to explain to the individual why this is being done.

2.6 The officer shall ensure that limited collection, limited use, disclosure, and retention principles are respected in identifying why personal information is to be collected.

3. Consent

3.1 The officer shall ensure that the individual from whom personal information is collected consents to its collection and consents to the information being used and disclosed, unless obtaining the consent would be inappropriate. In most cases, TCM will ask the individual to specifically consent. Consent may be in writing or given verbally. Sometimes an individual's consent is implied through that person's conduct with TCM. Sometimes personal information can be collected, used, or disclosed without the individual's knowledge and consent. For example, legal, medical, or security reasons might make seeking consent impossible or impractical. When information is being collected to detect and prevent fraud, seeking the individual's consent might defeat collecting the information's purpose. Seeking consent might be impossible or inappropriate when the individual is a minor, seriously ill, or mentally incapacitated.

3.2 In obtaining consent, the officer shall ensure that the individual's reasonable expectations are respected. (For example, a person giving his/her name and address to a charity to receive its newsletter or magazine reasonably expects that it will use that information to send other information about itself and fundraising needs.)

3.3 The officer shall ensure that the individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. The individual shall promptly be informed of the withdrawal's implications.

4. Limiting Collection

4.1 The officer shall ensure that personal information will not be collected indiscriminately. Both the amount and type of information collected shall be limited to that which is necessary to fulfill the purposes identified.

4.2 The officer shall ensure that information is collected only by fair and lawful means without misleading or deceiving individuals as to the reason.

5. Limiting Use, Disclosure, and Retention

5.1 The officer shall ensure that personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law, and any use of personal information shall be properly documented.

5.2 The officer shall ensure that all personal information is destroyed, erased, or made anonymous as soon as the purpose for which it was collected is no longer relevant, or as permitted by law. There shall be an annual review of the need to continue retaining personal information. Except as required to be retained by law, all personal information shall be deleted, erased, or made anonymous no later than seven years after the purpose for which it was collected has been completed.

6. Accuracy

6.1 The officer shall reasonably ensure that the personal information given is accurately maintained. If TCM is advised by an individual that the information it holds about that individual is not accurate, complete or up-to-date, TCM will take reasonable steps to correct it. When appropriate, the amended information shall be transmitted to third parties having access to the information in question.

7. Safeguards

7.1 The officer shall ensure that the organization has reasonable security safeguards to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. He/she shall do this regardless of the format in which the organization holds the information.

7.2 Depending on the information's sensitivity, the officer may permit reasonable discretion regarding the amount of information collected, how it is distributed and in what format and how it is stored. A higher level of protection shall safeguard more sensitive information according to the consent principle's considerations.

7.3 The officer shall ensure that the protection methods include,

- (a) Physical measures, for example, locked filing cabinets and restricted access to offices;
- (b) Organizational measures, for example, security clearance and limiting access on a "need-to-know" basis; and
- (c) Technological measures, for example, the use of passwords and encryption.

8. Openness

8.1 TCM is open about its policies and practices regarding the management of personal information. The policies and information about the related practices shall be available without unreasonable effort in a form generally understandable.

8.2 The officer shall ensure that the information available shall be either in a brochure at the locations where TCM operates, online, or through the mail and shall include,

- (a) The name or title and address of the officer who is accountable for the organizations policies and practices and to whom complaints or inquiries can be forwarded;
- (b) The means of gaining access to personal information held by the organization;
- (c) A description of the type of personal information held by the organization, including a general account of its use;
- (d) A copy of any brochures or other information that explain the organization's policies, standards, or codes; and
- (e) What personal information is made available to related organizations (e.g., organizations that are affiliated)

9. Individual Access

9.1 Upon request TCM shall inform an individual whether it holds personal information about him/her. If possible, the information's source shall also be given and TCM shall allow the individual access to this information. It may, however, choose to make sensitive medical information about its employees or volunteers available through a medical practitioner. The organization shall also account for the use that has been made or is being made of this

information and give an account as to the third parties to whom it has been disclosed. (Note, if the officer believes for valid reasons that access to personal information should be denied, he/she shall consult legal counsel before making such a decision.)

9.2 A person requesting his/her personal information must give sufficient information to permit TCM to provide an account of the existence, use, and disclosure of personal information.

9.3 The officer shall ensure that TCM responds to an individual's request within a reasonable time and at minimal or no cost to the individual. Detailed requests that require archive or other retrieval costs may be subject to a professional and disbursement fee. The requested information shall be made available in a generally understandable form. For example, TCM shall explain abbreviations or codes it uses to record information.