

**Personal Information Protection
Private Sector Privacy Legislation
Personal Information Protection Policy**

**Ratanak International
Personal Information Protection Policy**

At Ratanak International, we are committed to providing our donors with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our donors, protecting their personal information is one of our highest priorities.

While we have always respected our donors' privacy and safeguarded their personal information, we have strengthened our commitment to protecting personal information. British Columbia's *Personal Information Protection Act* (PIPA), which came into effect on January 1, 2004, sets out the ground rules for how B.C. businesses and not-for-profit organizations may collect, use and disclose personal information.

In this policy, we want to inform our donors of why and how we collect, use and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Personal Information Protection Policy, in compliance with PIPA, outlines the principles and practices we will follow in protecting donors' personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our donors' personal information and allowing our donors to request access to, and correction of, their personal information.

Definitions

Personal Information –means information about an identifiable individual but does not include work contact information (see below) or work product information. Some examples of personal information are: name, address, gender, education, income, financial information, medical and genetic information, date of birth, drivers' license number, photographs or images of an individual, employment history, and product preferences.

Contact information – means information that would enable an individual to be contacted and includes name, telephone number, address or email. Contact information is not covered by this policy or PIPA.

Privacy Officer – means the individual designated responsibility for ensuring that Ratanak International complies with this policy and PIPA.

Policy 1 – Collecting Personal Information

1.1 Unless the purposes for collecting personal information are obvious and the donor voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.

1.2 We will only collect donor information that is necessary to fulfill the following purposes:

- To process donations and offer tax receipts.
 - E.g. Ratanak will need a donor's credit card information, name and address to process a donation and issue a CRA compliant tax receipt
- To keep necessary records to comply with various legal or regulatory requirements.
 - E.g. Ratanak will need to maintain a donor's name, address, and donation history to keep proper CRA compliant records for at least seven years.
- To establish and maintain donor lists for newsletters or fundraising campaigns.
 - E.g. Ratanak will keep updated donor contact information and mailing preferences so that we are able to best reach the donor regarding informational mailings or fundraising campaigns.
- To ensure a high standard of service to our donors.
 - E.g. Ratanak will record a summary of donor phone calls or copies of emails so that staff can recall relevant donor information to assist them better.

Policy 2 – Consent

2.1 We will obtain donor consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).

2.2 Consent can be provided, orally, in writing, electronically, or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the donor voluntarily provides personal information for that purpose.

2.3 Consent may also be implied where a donor is given notice and a reasonable opportunity to opt-out of his or her personal information being used for mail-outs, fundraising and the donor does not opt-out.

2.4 Subject to certain exceptions (e.g. the personal information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), donors can withhold or withdraw their consent for Ratanak International to use their personal information in certain ways. A donor's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service or product. If so, we will explain the situation to assist the donor in making the decision.

2.5 We may collect, use or disclose personal information without the donor's knowledge or consent in the following limited circumstances:

- When the collection, use or disclosure of personal information is permitted or required by law;
- When the personal information is available from a public source (e.g., a telephone directory);
- When we require legal advice from a lawyer;
- To investigate an anticipated breach of an agreement or a contravention of law

Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only use or disclose donor personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as those outlined in section 1.2
- 3.2 We will not use or disclose donor personal information for any additional purpose unless we obtain consent to do so.
- 3.3 We do not share personal information with outside parties except when required by law or under express confidentiality agreements (e.g. auditors, mail service providers, IT consultants, payment processors, etc.)

Policy 4 – Retaining Personal Information

- 4.1 If we use donor personal information to make a decision that directly affects the donor, we will retain that personal information for at least one year so that the donor has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain donor personal information only as long as necessary to fulfill the identified purposes or a legal or regulatory purposes. As Ratanak International is a registered charity, we are required by the Canadian Revenue Agency (CRA) to keep donor information for at least seven years after the calendar year in which it was collected.

Policy 5 – Ensuring Accuracy of Personal Information

- 5.1 We will make reasonable efforts to ensure that donor personal information is accurate and complete where it may be used to make a decision about the donor.
- 5.2 Donors may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.
- 5.3 If the personal information is demonstrated to be inaccurate or incomplete, we will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of donor personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.

- 6.2 The following security measures will be followed to ensure that donor personal information is appropriately protected. Personal information that is collected from donors is kept secure within our online donation or donor software and in locked filing cabinets. Any personal information that is removed or duplicated from these sources (e.g. Donor reports, emails with donors, etc.) is handled with utmost care and is destroyed or secured as soon as the information is no longer needed.
- 6.3 We will use appropriate security measures when destroying donor's personal information such as shredding documents and deleting electronically stored information.
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.
- 6.5 Access to personal information is restricted only to staff members and volunteers that need the information to perform their respective duties.
- 6.6 If a privacy breach occurs which is likely to result in a risk for the rights and freedoms of individuals, we will notify the affected individuals and relevant agencies within 72 hours of first becoming aware of the breach.

Policy 7 – Providing Donors Access to Personal Information

- 7.1 Donors have a right to access their personal information, subject to limited exceptions.
- 7.2 A request to access personal information must be made in writing (including electronic requests) and provide sufficient detail to identify the personal information being sought.
- 7.3 Upon request, we will also tell donors how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.5 If a request is refused in full or in part, we will notify the donor in writing, providing the reasons for refusal and the recourse available to the donor.

Policy 8 – Questions and Complaints: The Role of the Privacy Officer or designated individual

- 8.1 The Privacy Officer is responsible for ensuring Ratanak International's compliance with this policy and the *Personal Information Protection Act*.
- 8.2 Donors should direct any complaints, concerns or questions regarding Ratanak International's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the donor may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Ratanak International's Privacy Officer:

Mail: Box 81083, Burnaby, BC, V5H 4K1

Phone: 604-325-9300 or

Email: office@ratanak.org