

Privacy Policy

1 Purpose

Lupus Ontario (“LO”) respects the privacy of its donors and employees and treats their personal information accordingly. We are aware of our responsibilities under the federal Personal Information and Electronics Documents Act (PIPEDA). We do not share or trade our membership information or other contact data received.

This Privacy Policy explains how LO collects, uses, and discloses your personal information in compliance with the applicable privacy legislation.

LO takes steps to safeguard all personal information in its possession or custody, including personal information that has been transferred to a third party for processing (e.g. to a service provider or individual who is acting on behalf of the Society). This includes situations where the actions undertaken on LO’s behalf are carried out voluntarily or without charge.

By using any of the services provided by LO, you acknowledge that you have read and understood this Privacy Policy, and you agree and consent to the collection, use, and disclosure of your personal information in accordance with this Privacy Policy. If you do not agree with this Privacy Policy, please do not supply your personal information to us.

2 Executive Champion

The President or a Member of the Executive Committee of LO is the executive champion of this Policy.

3 Policy Type

External

4 Information collected

Personal information means information about an identifiable individual but does not include information such as name, title, business address, business telephone number or email address normally used to contact an individual in relation to their employment or profession. We only collect the personal information that is necessary to fulfill the purposes identified in this Privacy Policy.

4.1 Information you may provide:

We collect personal information about individuals only if you volunteer it in a survey and/or request information and/or “ask the expert” and/or other “on site” registrations and/or make a donation. We may use this information to contact the individual for support purposes and to answer questions submitted. All information is kept confidential

Depending upon the nature of your relationship with us, the types of personal information that we may collect include, but or not limited to, your:

- Name, telephone number, address, email address;
- gender, language;
- responses to program-specific registration questions;
- volunteer interest and history.

4.2 Donor specific information

If you are a donor, in addition to the information listed above, you may also provide the following information:

- credit card information if you are making a donation. This information is encrypted and not accessible to anyone.
- banking information for donors that donate through bank account payments. Banking information is not stored in the system.

LO maintains records of all contributions. All information is kept private and confidential, stored in a secure location and accessible only by authorized staff.

4.3 Usage information on our website:

When visiting our web site, our web server automatically logs (records) domain name and standard information about the operating system and web browser being used, as provided by each web browser. This information is used for statistical purposes to help Lupus Ontario manage our site, but it does not identify the individual in any way.

5 Purposes for collecting, using and disclosing your personal information

LO collects and uses donor information for communication and for accounting and tax filings. Lupus Ontario does not disclose or sell donor information to third parties.

5.1 Managing our relationship with you:

LO collects, uses and discloses the personal information that you provide to us for the following purposes:

- to manage our relationship with you and provide you with information about our programs and services;
- to respond to your questions and other communications, including those that you send through our website, by email or by phone;
- to contact you for fundraising purposes;
- to facilitate and process your registration for certain events and services;
- to authenticate you when you access to our website;
- to issue tax receipts where applicable;
- as otherwise permitted or required by law.

5.2 Delivering Personalized Content

In order to make your experience with our website as supportive as possible we may use cookies on your computer. If you do not want to receive this type of customized online behavioural advertising, you may set your browser to block third party cookies or clear your cache after each use.

6 Disclosure of personal information

We may share your personal information with or disclose such information to third parties with your consent, or when permitted or required by law, including but not limited to circumstances where disclosure is necessary to comply with a court order or warrant, or to protect the safety, property or other rights of LO (e.g., including to detect and protect against fraud).

Please be aware that any information you voluntarily submit such as photographs or other content you post to any public LO forums, including our Instagram, Facebook, LinkedIn or other social networking pages or websites may be collected, used and shared by others who use or access those same services.

Otherwise, we only share your personal information in the following limited circumstances as outlined in 5.1 and 5.2,

6.1 Service Providers

LO may use third-party service providers that help with our operations and services including customer service, direct response fundraising, operating and maintaining our website, and for processing credit card transactions.

Where we are using a third party to process your personal information we will enter into contractual arrangements that require them to keep secure your personal information with appropriate security safeguards equal to or higher than our own standards. Some of our service providers may store or process personal information outside of Canada. Your information is protected with appropriate security safeguards, but may be subject to access by foreign governments, courts, or law enforcement in those jurisdictions according to the laws in those jurisdictions. When we do transfer information outside the country, we strive to minimize the amount of personal information we transfer.

6.2 For legal or law enforcement purposes

We may be required to provide personal information to law enforcement or other government agencies pursuant to legal or regulatory requirements.

7 Protecting Donor specific information

In order to ensure donor confidentiality is maintained, LO has taken additional steps wherein the following individuals are required to adhere to specific requirements as set out below.

President or Member of the Executive Committee

- Act in capacity of privacy officer as it relates to donor information
- Ensure that all staff and volunteers have an orientation and ongoing training on the need for confidentiality of all donor information and understand that compliance is a condition of their continued participation in the organization
- Ensure all staff and volunteers comply with confidentiality obligations as set out in the Code of Conduct; and
- Determine what level of visibility to donor information each volunteer or staff member will have.

Staff or Volunteers working with donors/lists of donors shall:

- Ensure adequate security safeguards are in place to protect donor information and limit access to donor files (e.g. locking filing cabinets, password protected software etc.);



- Provide copies of donor's personal information when requested by a donor; and
- Ensure LO does not trade or sell donor lists to individuals not authorized and without prior consent of donors.

8 Retention of personal information

We retain your personal information only for as long as we need it to fulfill the purposes for which it was collected and to comply with our legal obligations. We may retain usage-related information in aggregate or de-identified form indefinitely.

9 Security

To help protect the confidentiality of your personal information, LO employs security safeguards appropriate to the sensitivity of the information. We maintain reasonable technical, physical and administrative security safeguards to protect your personal information against loss, theft, and unauthorized access.

9.1 Credit Card Information

If you make a credit card payment through LO website, we take steps to reduce risks, including by collecting only the information that is reasonably needed by us to complete the processing of the transaction. For one-time payments by credit card LO only stores the credit card type, the last four digits of the credit card number and the expiration date in the event an incorrect payment needs to be refunded.

10 Individual Access and Accuracy of Personal Information

You may request access to your personal information we hold by contacting us at the contact information below. and we will respond in accordance with any applicable laws. We will need to verify your identity before providing you with the personal information we hold about you. There is no cost for such access request unless you require copies of records.

There may be limited circumstances where we cannot provide you with access to your personal information. For example, if the information cannot be separated from the personal information of others, cannot be disclosed for reasons of security or commercial confidentiality, or is protected by legal privilege. If we do not provide you with access to your personal information,



we will generally advise you of the reasons why, unless we are prohibited by law from doing so.

You may request to update, correct or change your personal information at the contact information below. We shall endeavor to correct or complete any personal information which you advise us is inaccurate or incomplete. Where appropriate, the amended information will be transmitted to any third parties requiring access to such information.

11 Changes to this Privacy Policy

This Privacy Policy may be amended by LO from time to time to reflect changes in LO's practices. The collection, use and disclosure of your personal information by LO will be governed by the version of this Privacy Policy in effect at that time. We will post the most current version on our website and will indicate at the top of this page the date this Privacy Policy was last revised. Please check back from time to time to ensure that you are aware of any updates or changes in this Privacy Policy.

12 Consent to the terms of this Privacy Policy

By providing us with your personal information, you agree that LO may collect use and disclose your personal information as indicated above. If you do not agree with any terms of this Privacy Policy, please do not provide us with any personal information. If you have questions regarding the collection, use or disclosure of your personal information you may contact us at any time, as set forth below under "Contact Us".

Subject to legal and contractual requirements, you may withdraw your consent to certain of the purposes identified in this Privacy Policy at any time by contacting us at the contact information set forth below. If you withdraw your consent, you acknowledge that LO may not be able to provide you with certain services or information which may be of value to you.

13 Contact Us

If anyone does not wish to receive donor related contact, please let LO know by sending e-mail to info@lupusontario.org, by calling us at the telephone numbers below or by writing to us at the address below. Please provide us with your exact name and address. We will then remove your name from our confidential list.

14 More information

If you would like more information about Lupus Ontario's privacy policy, please contact the President at info@lupusontario.org or at the telephone number or address in Oshawa listed on the contact us page.

Further information on privacy and your rights in regard to your personal information may be found on the website of the [Office of the Privacy Commissioner of Canada](#).

15 Monitoring and Compliance

If any employee or volunteer is aware of any breach of the Privacy Policy they must report it to the President or a Member of the Executive Committee of LO. The President and or a Member of the Executive Committee will be responsible for the monitoring and compliance of this policy.

16 Policy Review

To be reviewed every three years