

Privacy Policy



Approved as Board Policy by the Board of Directors on August 19, 2015

Purpose

The purpose of this policy is to ensure that Rainbow Railroad (hereinafter “the Organization”) collects, uses, discloses, and/or disposes of the personal information of individuals with whom the Organization has dealings in a manner that is ethical and consistent with the Organization’s mandate. This policy was modelled after the *Personal Information Protection and Electronic Documents Act* (PIPEDA).¹

This policy does not apply to the collection of personal information for the purposes of case work, which is governed by the Code of Ethical Conduct for Case Committee Members.

Overriding Obligation

Any collection, use, or disclosure of personal information by the Organization must only be for purposes that a reasonable person would consider are appropriate in the circumstances.

10 Fair Information Principles

The Organization will strive to comply with the 10 fair information principles that are laid out in Schedule 1 of PIPEDA.²

Principle #1 - Accountability

Any member, staff, or volunteer of the Organization who collects or manages personal information must do so in accordance with this policy.

Information collected by third party platforms (e.g. Canada Helps or Chimp) will be subject to their privacy policies.

The individual responsible for the Organization’s compliance is the Executive Director who will act as the Privacy Official. For enquiries regarding the collection of personal information or for access to our collection of information, please contact the Executive Director at info@rainbowrailroad.ca.

Any individual that provides private information to the Organization consents to resolve any dispute regarding his or her personal information by way of informal negotiation and

¹ SC 2000, c 5.

² *Ibid.*

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consultation with the Executive Director of the Organization. If no resolution can be reached within 30 days, either party may consult the Privacy Commissioner of Canada.^{3 4}

Principles #2 and #3 - Identification of Purpose and Obtaining Informed Consent

The Organization collects personal information to process payments (such as donations or ticket sales), issue tax receipts and to communicate with donors and supporters.

Individuals implicitly give their consent to the Organization to use their personal information for the purposes outlined above at the time they provide the information. Individuals will be given the opportunity to unsubscribe from donor stewardship communications and/or the Organization's newsletter.

The Organization will obtain an individual's consent before disclosing his or her information to a third party. The Organization does not sell, barter or lease donor, membership or other fundraising lists.

Consent is not required for the disclosure of personal information when:

- a. It is given to a lawyer representing the Organization;
- b. It is required by law; or
- c. It is required by a regulatory or statutorily-created investigative body, such as the Canada Revenue Agency or Privacy Commissioner of Canada.

Principles #4 and #5 - Limiting Collection, Use, Disclosure, and Retention

The Organization will limit the amount and type of the information gathered to what is necessary for the identified purposes.

The Organization will keep personal information only as long as it is necessary to satisfy the purposes for which it was collected. The Organization will destroy, erase or render anonymous information that is no longer required for an identified purpose or a legal requirement.

Principle #6 Accuracy

The Organization will keep personal information as accurate, complete and up-to-date as necessary, taking into account its use and the interests of the individual. The Organization relies on the individual to identify any information that is erroneous, deficient, or out-of-date.

Principle #7 Safeguards

³ Chimp's Privacy Policy.

⁴ See Principle #10 for available recourse.

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The Organization members, staff, and volunteers will only share personal information amongst themselves on a need-to-know basis.

The Organization members, staff, and volunteers shall ensure that personal information under their control is properly shielded from those not entitled to access it. This entails physically barring access to hardcopy records and creating strong passwords for electronic records.

Principles #8 and #9 - Openness and Access

This policy governs how the Organization is to collect and manage personal information. This policy can be found on the Organization's website. Enquiries that cannot be answered by this policy should be directed to the Executive Director at info@rainbowrailroad.ca.

Individuals have the right to know about and access any personal information that The Organization possesses about them. If individuals wish to access information, they should contact the Executive Director. The Executive Director is able to ask the individual for sufficient information in order to be able to account for the existence, use, and disclosure of information.

The Organization will correct or amend any information about an individual if its accuracy or completeness is challenged by that individual.

Principle #10 - Available Recourse

If an individual is dissatisfied with the manner in which the Organization has handled his or her information, he or she should contact the Executive Director at info@rainbowrailroad.ca.