



## War Child Canada Privacy and Confidentiality Policy

### 1. Position Statement

The purpose of this Privacy Policy is to give you information about what Personal Information War Child Canada ("WCC", also "we", "our", "us") collects from you, why we collect it and how we use it, as well as what happens if you choose not to disclose certain Personal Information to us. This Privacy Policy is based on the principles outlined in the Canadian Standards Association's Model Code for the Protection of Personal Information, set out in Schedule 1 of Canada's *Personal Information Protection and Electronic Documents Act*. We will only collect, use, and disclose your personal information in accordance with this Privacy Policy.

**PLEASE READ THIS DOCUMENT CAREFULLY.**

**IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, PLEASE DO NOT USE OUR WEBSITE OR SUBMIT ANY PERSONAL INFORMATION TO US.**

### 2. Scope

This Privacy Policy applies to any Personal Information provided to or collected by WCC through our Website, by email, facsimile, postal mail, hand delivered, verbally or any other means.

### 3. Responsibility & Authority

Management is responsible for sufficient, open communication with employees, as well as for communicating this policy to staff and for using their best judgment in providing approvals as indicated throughout this Policy.

Staff and management alike are responsible for adhering to and actively supporting the implementation of this Policy.

### 4. Policy Statements

#### HOW WCC COLLECTS PERSONAL INFORMATION

WCC collects Personal Information in different ways, including:

- Direct interactions – you may voluntarily provide us with Personal Information by applying for or receiving services from us; by filling out forms; creating an account for our Website; making a gift or donation to WCC; applying to work or volunteer for WCC; registering to attend an event; partnering with us to host an event; requesting information to be sent to you; subscribing for our publications; responding to one of our direct mail or telemarketing campaigns; participating in one of our events; through our Website; or communicating with us face to face, over the telephone, by mail, by email, by text, or through other means. To protect your privacy, you should not provide us with any Personal Information that is not specifically requested.
- Automated interactions – when you use our website, we may automatically collect technical data about your equipment and browsing history using cookies and similar technologies (See E below for more information).

- Third-party interactions – We may receive Personal Information about you if you receive services from us through one of the third-party intermediaries who deliver services on our behalf in many countries around the world. We may collect Personal Information when you interact with our content on third-party sites or platforms such as Facebook, Instagram, or YouTube. This may include data such as comments or feedback, “likes” or shares, profile data or the fact that you viewed or interacted with our content. We may receive Personal Information about you while fundraising, data analysis, or data management activities. We may receive Personal Information when you donate to us directly or through any donor management system we may use from time to time.

## WHAT PERSONAL INFORMATION IS COLLECTED BY WCC

The Personal Information we may collect could include:

- Personal identifiers such as your name, date of birth, and gender
- Contact information such as your mailing address, telephone number, and email address
- Images, including photographs and videos
- Credit card and bank account information, if you make donations or purchase goods or services from us. We collect this information via secure payment processing services
- Donor information such as your donation history, donation type, donation amount, and specific donation designation requests
- Employment history and background checks for volunteers and employees, including results of police records checks
- Employee records
- Website log files for recording and maintenance of data
- Information about events you have participated in
- Information about your device such as your IP address, location or provider and your usage information and browsing history. (See E below for more information)
- Information about your interactions with our content on third-party sites or platforms, such as Facebook and Instagram
- Communications such as letters, emails, and digital communications that we send to you or that you send to us
- Personal Information you give us that we did not request (such as Personal Information you voluntarily put into an email to us).

## OUR GUIDING PRINCIPLES

### 4.1 Accountability:

WCC is responsible for Personal Information under our control. We have designated a Privacy Officer to be accountable for our compliance with these principles and to oversee questions relating to privacy and this Privacy Policy. If you have any questions about this Privacy Policy, including how to exercise your legal rights, or if you would like specific information about how we manage Personal Information, please contact the Privacy Officer at:

Attn: Privacy Officer  
 War Child Canada  
 67 Mowat Ave, Suite 248, Toronto, ON  
 Email: [privacy@warchild.ca](mailto:privacy@warchild.ca)

### 4.2 Identifying Purposes:

We use the Personal Information we collect to manage our operations and for various purposes associated with supporting the programs and services we provide. We collect, use, and disclose Personal Information only for

purposes that a reasonable person would consider appropriate in the circumstances.

The main purposes for which we generally use Personal Information are:

- To manage, oversee and administer our operations
- To improve the quality and efficiency of WCC operations
- To contact you for fundraising purposes
- To carry out fundraising activities, on our own and in collaboration with other organizations
- To guide the development of new features or services based on your preferences and patterns for support
- To receive and process your donations or online purchases
- To receipt and acknowledge your donations
- To provide donor stewardship and recognition information
- To maintain and manage relationships and provide customer service
- To determine your solicitation preferences and whether you have subscribed to or unsubscribed from any of our mailing lists or publications
- To respond to your requests for information
- To track communications with you
- To identify and authenticate you in our information system and network
- To provide, administer, and protect our website, information system, and network
- For privacy and quality management audits and training
- For data analysis and data management
- To protect our rights, property, or safety or that of our employees, volunteers, or any other person
- For other purposes that we have told you about and for which you have given us your consent
- To fulfill other purposes permitted or required by law

We do not collect more Personal Information than we need to achieve these purposes.

#### **4.3 Consent:**

We only collect, use, and disclose Personal Information with your knowledge and consent. Your consent may be expressed orally, electronically, or in writing or it may be implied. We are committed to obtaining meaningful consent and use clear explanations and plain language to make sure that our consent processes are understandable and user friendly.

You have the right at any time to withdraw or cancel your consent to the collection, use or disclosure of your Personal Information by contacting WCC's Privacy Officer at [privacy@warchild.ca](mailto:privacy@warchild.ca). Withdrawals of consent only take effect from the date of cancellation. They cannot be retroactive. We will let you know if your withdrawal could have any consequences, such as WCC being unable to provide you with goods or services.

#### **4.4 Limiting Collection:**

WCC will only collect personal information for the purposes identified in this Privacy Policy. If we want to collect information for a different purpose, we will tell you what that purpose is in writing and obtain your consent.

We will not collect, use, or disclose more Personal Information than is reasonably necessary to meet the identified purposes. We will limit our collection of Personal Information to that which is necessary for the purposes identified by WCC. We collect Personal Information only by fair and lawful means.

#### **4.5 Limiting Use, Disclosure, and Retention:**

WCC will only use or disclose Personal Information for the purposes for which it was collected unless we have your consent to use it for a different purpose or if we are required by law. If we want to use or disclose your Personal Information for a new purpose, we will advise you of this purpose in writing and obtain your consent.

We keep Personal Information only if necessary to achieve the purposes for which it was collected although we may retain certain Personal Information indefinitely if we are required to do so by Canada Revenue Agency or by our insurers. If you have made a request to access Personal Information, we will keep that Personal Information for as long as is necessary to allow you to fully seek any remedies (exhaust any recourse) that you may have under federal and provincial legislation.

We do not disclose or share Personal Information more widely than is necessary to achieve the purposes for which it was collected.

We may share Personal Information with the parties set out below for the following purposes:

- Other registered charities in connection with specified joint-fundraising activities, subject to agreements requiring them to follow appropriate privacy practices.
- When the services that you have expressly requested from us require us to give your information to third parties not employed by us
- Third-party service providers to enable them to provide us with services, such as those who deliver our charitable programs on our behalf in various countries around the world, provide us with IT and system administration services, data analytics services, donor management services, credit card and payment processing services, e-commerce services, fundraising services, telemarketing services, direct mail services, donor relations services, donation management services, and database management services
- Professional advisors, such as lawyers, auditors, bankers, and insurers who provide us with legal, accounting, auditing, banking, and insurance services
- Government, regulatory authorities, law enforcement, dispute resolution bodies, courts, and similar entities to comply with any legal or regulatory obligation, to detect and prevent terrorism, money-laundering, other crimes or to assert or defend legal rights and interests
- Any persons or entities where we have a legitimate business reason for doing so, such as to manage risk, to process payments to you or to someone on your behalf or to perform or carry out the terms of any contract between us
- To the transferee if we transfer, sell, or dispose of all or substantially all of our assets or operations
- To anyone we reasonably believe is your agent
- To other third parties if we have told you about them and you have given us your consent.

We require all third parties to respect the security of your Personal Information and to treat it in accordance with all applicable legal requirements. All third-party service providers are required to enter into contractual agreements with us that prevent them from using your Personal Information for their own purposes and require them to use your Personal Information only for specific purposes in accordance with our instructions and all applicable legal requirements.

#### **4.6 Accuracy:**

WCC has adequate processes and safeguards in place to keep Personal Information as accurate, complete, and up to date as is necessary for the purposes for which it is to be used. We will not routinely update Personal Information, unless such a process is necessary to fulfil the purposes for which the Personal Information was collected. To change or modify any Personal Information previously provided to WCC, contact the Privacy Officer at [privacy@warchild.ca](mailto:privacy@warchild.ca).

#### **4.7 Safeguards:**

War Child Canada has implemented electronic and manual security procedures to protect against the loss, misuse or alteration of the personal information of donors, volunteers and prospects. Information is stored in a secure database with restricted password access only. The server is firewall protected and access to information is available to only authorized staff whose responsibility and accountability is for the management of donor relations

and bound by a code of conduct and confidentiality agreement.

Your online donations to War Child Canada are processed through our website and/or a third-party provider with which War Child Canada entered into a contract governed by privacy policies as well as the security and privacy policies of the provider and in compliance with the Freedom of Information and Protection of Privacy Act and its procedures. War Child Canada operates within the standards of practice for e-donations as articulated by the Association of Fundraising Professionals (AFP). WCC makes all employees, volunteers as well as third-party service providers aware of the importance of maintaining the privacy and security of Personal Information. All WCC employees and volunteers must sign a confidentiality agreement.

While we are committed to protecting your Personal Information, our security practices and technology measures cannot guarantee absolute security of Personal Information and we cannot ensure or warrant the security of any information you provide to us.

#### **4.8 Openness:**

WCC will make available to individuals specific information about our policies and practices relating to the management of Personal Information, including by posting this Privacy Policy on our Website. If you have any questions about this Privacy Policy, including how to exercise your legal rights, or if you would like specific information about how we manage Personal Information, please contact the Privacy Officer at [privacy@warchild.ca](mailto:privacy@warchild.ca).

#### **4.9 Individual Access:**

If you make a request to the Privacy Officer, we will inform you of the existence, use, and disclosure of your Personal Information and we will give you access to your Personal Information. We will respond to your request within the time periods provided for under applicable laws.

#### **4.10 Challenging Compliance:**

You can challenge the accuracy and completeness of the Personal Information and have it changed or corrected as appropriate if there is an error or omission by contacting the Privacy Officer. We will respond to your request within the time periods provided for under applicable laws. If we identify a gap in compliance, we will take appropriate steps to remedy the situation, including changing our policies and practices if necessary.

### **INFORMATION COLLECTED THROUGH TECHNOLOGY AND SOCIAL MEDIA**

A cookie is a small text file that is placed on your device when you visit a website and can last either for the duration of your visit (a “session cookie”) or for repeat visits (a “persistent cookie”).

Pages of our website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit WCC, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We use the word “cookie” in this Privacy Policy to refer to all files that collect information in this manner.

Some of the cookies we use may be necessary for security purposes, to authenticate you and enable you to use our website. Other cookies may not be essential but may make it easier for you to use the website (such as by identifying you, remembering your preferences and helping you navigate the website). Some cookies are used to help us analyze the use and performance of the website, as well as for advertising or tracking purposes, including allowing our advertising partners to track and analyze your behaviour on our website and across the internet (e.g. Google Analytics, which tracks website usage and traffic).

We collect the following types of information through cookies:

- your IP address
- your approximate geographic location
- the type of operating system you are using (i.e. Windows or Mac)
- the type of device you are using
- the type of browser you are using
- the domain name from which you reached our website
- which pages you visit on our website
- the frequency, date, and time of your visits to our website.

In addition to the purposes identified above, we collect and may share this information with our service providers and agents for the purpose of understanding how visitors use our website, to improve the functionality and content of the website and to improve your interaction with the website by making it easier for you to get back to the pages you have looked at the next time you visit.

You have choices when it comes to cookies. All major browsers allow you to disable cookies. If you do not want information collected using cookies, you can disable cookies by changing the setting of your internet browser. If you disable cookies, you may be unable to use or access some features on our website.

Our website may also provide links to third-party websites. Clicking on those links may allow third parties to collect or share information about you. We cannot control these third-party websites and we are not responsible for the actions or policies of such third parties. You should check the privacy policies of third parties when visiting their website or when providing any Personal Information to them.

We may collect Personal Information when you interact with our content on third-party sites or platforms, such as Facebook, Instagram, or YouTube. This may include data such as comments or feedback, "likes" or shares, profile data, or the fact that you viewed or interacted with our content. If you voluntarily post or submit any information on these platforms, your Personal Information may be automatically included in the posting and may be collected and used by others.

## PROTECTING THE PRIVACY OF CHILDREN AND YOUTH

We understand that Personal Information relating to children and youth is particularly sensitive, especially the younger they are. Consistent with the position of the Office of the Privacy Commissioner of Canada, we will not knowingly collect Personal Information from children under the age of 13 unless we have the consent of their parents or guardians. We collect the minimum amount of Personal Information of children and youth necessary to achieve our purposes.

**IF YOU ARE UNDER THE AGE OF 13, you should not access our website or provide us with any Personal Information unless your parent or guardian has consented. If we discover that we have collected Personal Information from a child under the AGE OF 13 without parental consent, we will delete that Personal Information.**

## OTHER JURISDICTIONS

Some or all of the Personal Information we collect may be transferred to third-party service providers in the course of our normal operations or activities including, without limitation, being stored on servers in cloud-based environments or transferred through other technological measures to trusted third parties to assist us in serving you. Some of our services providers are located outside of Canada and therefore Personal Information may be stored or processed in jurisdictions outside of Canada. As a result, this information may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to laws in those

jurisdictions.

## **CHANGES TO THE PRIVACY POLICY**

We may make changes to this Privacy Policy from time to time, such as in response to developments and changes in privacy law. When we post changes to this Privacy Policy on our Website, we will change the “last updated” date at the top of this Privacy Policy. If possible, we will post notices of significant changes before they take place. Your continued use of our website after any changes are made signifies your agreement with the terms of the revised Privacy Policy.

### **5. Violation/Breach of Policy**

If you have any questions or concerns about this Policy, please speak with the Privacy Officer as stated on Page 3.

An employee violation of this Policy is a fundamental breach of the employment relationship and is subject to progressive disciplinary action, up to and including termination of employment.

### **6. Related Policies:**

Gift Acceptance Policy

Whistleblower Policy

Accountability to Affected Populations Policy