



# Christmas Bureau of Edmonton Privacy Policy

Governance Committee	October 1, 2020 - updated June 11, 2014	October 2023	June 11, 2014
<i>Owner</i>	<i>Date of Board Meeting Approval</i>	<i>Review Date</i>	<i>Effective Date</i>

## 1.0 POLICY STATEMENT

The Christmas Bureau of Edmonton (hereafter referred to as Christmas Bureau) respects the privacy of the personal information of our donors, volunteers, members, clients, supporters, employees and other stakeholders. We value the trust of those we deal with, and of the public, and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the information that is shared with us. We are committed to protect all personal information gathered and to use this information solely for the purpose for which it was collected.

During the course of our various program, projects and activities, the Christmas Bureau frequently gathers and uses personal information. Anyone from whom we collect such information should expect that it will be carefully protected and that any use of, or other dealings with, this information is subject to consent. The Christmas Bureau's privacy practises are designed to achieve this.

## 2.0 POLICY PRINCIPLES

### *Defining Personal Information*

- Personal information is any information that can be used to distinguish, identify, or contact a specific individual.
- This information can include an individual's opinions or beliefs, as well as facts about, or related to, the individual.
- Exceptions – business contact information and certain publicly available information, such as names, addresses, telephone numbers and email addresses as published in telephone directories and on websites, are not considered personal information/
- Information in the public domain is not subject to privacy legislation and as such is not included in this policy.
- The Christmas Bureau considers donor, volunteer and employee information always to be personal information, and do not disclose information about donors, volunteers or employees without consent.

### *Collecting Personal Information*

- The Christmas Bureau is responsible for all personal information in its custody and under its control.
- This includes donors, volunteers, members, clients, supporters, employees and other stakeholders.
- The Executive Director is the individual designated to ensure the Christmas Bureau remains in compliance with this policy.
- Personal information will be obtained only for reasonable purposes and only as much as is

reasonable for those purposes.

- Personal information will be disclosed or used for reasonable purposes, and those purposes will be shared with the individual prior to disclosure or use.
- Consent will be implied unless the individual expressly prohibits the use of information for the disclosure and use shared by the Christmas Bureau.
- The Christmas Bureau will make every reasonable effort to maintain accurate information and will, on request, correct information that is inaccurate.
- The Christmas Bureau will ensure personal information is reasonably secure and keep the information only as long as is required by legislation (see Records Retention and Destruction Policy).

#### *Security Safeguards*

- Personal information gathered by Christmas Bureau shall be kept in confidence.
- Christmas Bureau personnel shall be authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained.
- Appropriate physical and electronic measures shall be used to ensure personal information is secure.
- Access to donor, volunteer, member, client, supporter, employee and other stakeholder records shall be limited to those who require such information to fulfil their job responsibilities.
- Special protection shall be given to all records pertaining to anonymous donors.
- The confidentiality of records shall continue after the relationship with the individual has ended.

### 3.0 PROCEDURES

The Christmas Bureau observes the following practises when collecting, maintaining, and using personal information:

#### *Consent*

- An individual's consent is required regarding the collection and proposed use of personal information when information is collected.
- Consent can be either express or implied and can be provided directly by the individual or by an authorized representative.
- Express consent can be given orally, electronically or in writing.
- Implied consent is consent that can reasonably be inferred from an individual's action or inaction.
- An individual's consent is required before confidential information is released to outside parties.

#### *Cookies*

- The Christmas Bureau's websites use cookies within visiting browsers to enable the functions of the websites and for tracking performance.
- Specifically, cookies are used in the following ways:
  - Preserving and expiring visitor sessions on the site (e.g.: preserving data between steps of a process; and ending the session after a period of inactivity)
  - Enabling web analytic tools (such as Google Analytics)
- Cookies are used anonymously and without storing Personally Identifiable Information (PII).

- Visitors that wish to opt-out of cookies should review the help documentation for their browser software to decline or selectively decline cookies.
- Declining the cookies on the Christmas Bureau websites may adversely impact site performance.

#### *Google Analytics*

- The Christmas Bureau website uses Google Analytics to track performance.
- Google Analytics uses persistent cookies to track visitor sessions, visitors across multiple sessions, and referral sources to our websites.
- The Christmas Bureau also tracks the performance of promotional links to our website using Google Analytics.
- In compliance with the Google Analytics Terms of Service, at no time is Personally Identifiable Information (PII) passed to Google Analytics.

#### *Links to Other Websites*

- The Christmas Bureau website may contain links to other websites.
- However, once leaving the Christmas Bureau website, please note the Christmas Bureau does not have any control over privacy policies on those sites.
- Therefore, the Christmas Bureau cannot be responsible for any information provided while visiting third party websites.

#### *Disclosure of Information*

- Requests for information pertaining to clients, agencies, donors, volunteers or staff will be directed through the Executive Director.
- Requests must be in writing from the individual or authorized representative.
- Requests will be reviewed to ensure that any information released will not threaten the safety or security of another individual.
- The Christmas Bureau will respond with 45 days openly, completely, and accurately.
- The Christmas Bureau will make every reasonable effort to help applicants understand what the information is about and how it is used.
- If the Christmas Bureau refuses access to any or all of an individual's personal information, it will explain to the applicant the reasons for refusing and the name of the person who can answer any questions the applicant may have.

## 4.0 BREACH OF PRIVACY POLICY

The Christmas Bureau is responsible for all personal information under its control, including any personal information that is transferred to third parties for processing, storage or other purposes. We respect the privacy of our donors, clients, agencies, volunteers and employees and are committed to protecting their privacy rights and personal information.

The Christmas Bureau has a Privacy Officer to whom our stakeholders are accountable for compliance with these privacy and security guidelines. Should anyone feel that their privacy has been breached due to any Christmas Bureau practices, they may submit a written complaint (in accordance to the Christmas Bureau Complaint Policy) to the Christmas Bureau Privacy Officer.

The Christmas Bureau has designated the Executive Director as the Privacy Officer. Any questions or concerns about the Christmas Bureau privacy practices can be directed to the Privacy Officer, in writing or by phone, with contact information and incident details.

Privacy Officer  
Christmas Bureau of Edmonton  
#1, 12122 68 St NW  
Edmonton, AB T5B 1R1  
Phone: 780 421 9627  
e-mail: [privacy@christmasbureau.ca](mailto:privacy@christmasbureau.ca)

Should an individual not be satisfied with the resolution of their complaint, they may address their complaint to the Alberta Privacy Office.

## 5.0 RESPONSIBILITIES

The Board of Directors is responsible for the overall development, enforcement and review of the privacy policy for the Christmas Bureau of Edmonton ensuring that updates adhere to governing legislation and best practises.

The Governance and Strategic Planning Committee is responsible for the development and review of the Privacy Policy and any reported breaches.

At the Annual General Meeting, the Chair, Governance and Strategic Planning shall report any breach of the Privacy Policy and the resolution thereof. If there are no breaches to report, the Chair, Governance and Strategic Planning shall make a declaration that the Christmas Bureau of Edmonton has adhered to and maintained the guidelines and standards of the Privacy Policy.