

## Privacy Policy

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### 1. Purpose

Lupus Ontario is dedicated to protecting the privacy of our donors, volunteers, and other stakeholders. This policy outlines how we collect, use, disclose and protect personal information.

### 2. Commitment to Privacy

Lupus Ontario is aware of its responsibilities under the federal Personal Information and Electronics Documents Act (PIPEDA). Additionally, it recognizes everyone's right to privacy and pledges to protect it.

### 3. Scope

This policy applies to all personal information collected, used or disclosed by our organization. All employees and volunteers of Lupus Ontario are responsible for monitoring the personal information under their control and are required to adhere to this policy without exception.

### 4. Definition

#### 4.1 Personal Information

Personal information is any information recorded in any form that identifies or can identify an individual, other than an individual's business contact information. It includes your name, gender, address, postal code, phone number, date of birth, credit card details or other financial information, health information, donation amounts and dates, volunteer information such as availability and areas of interest as well as your history of involvement with Lupus Ontario.

Personal information does not include anonymous or aggregate information that cannot be tracked back to you personally.

### 5. Executive Champion

The President is the Executive Champion of this policy.

### 6. Information collected

#### 6.1 Personal Information

**6.1.1** Personal information about individuals is collected only if it is volunteered in a survey, request information, registrations or making a donation. This information may be used to contact the individual for support purposes and to answer questions submitted. All information is kept confidential.

**6.1.2** If anyone does not wish to be contacted, Lupus Ontario can be advised via e-mail to [info@lupusontario.org](mailto:info@lupusontario.org), by calling the telephone numbers

below or by writing to the address below. Exact name and address must be provided. Requestor name will then be removed your name from the confidential list.

**6.1.3** Any medical information shared within support groups or Lupus Ontario staff is kept confidential.

### **6.2 Donor information**

Lupus Ontario maintains records of all contributions. All information is kept private and confidential, stored in a secure location and accessible only by authorized staff. Donors may indicate that they do not wish to be contacted on the on-line donor form.

### **6.3 Personal Health Information**

Lupus Ontario does not provide health related services. Should you choose, or are required, as part of our support programs to provide us with your health information, Lupus Ontario does not collect or use this information to provide you with opinions or endorse any particular treatment option or course of action, nor do we use this information to make decisions on your behalf or provide you with medical referrals or advice.

### **6.4 Aggregated information**

Aggregated information is used for our planning purposes, health promotion and general administration of Lupus Ontario's business, including to assess the effectiveness of Lupus Ontario's programs and campaigns, improving donor experience and assisting in developing new programs and channels to assist clients. This information will be compiled and analyzed on an aggregate basis and, unless, we have your specific consent to use identified information, does not identify any individual and therefore is not treated as personal information under this policy.

### **6.5 Website tracking**

When visiting the Lupus Ontario web site, the 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 the site, but it does not identify the individual in any way.

## **7. Consent**

Requirements for consent to the collection, use, or disclosure of personal information vary depending on circumstances and on the type of personal information. Consent can be obtained in person, by phone, by mail, or via the Internet.

### **7.1 Implied Consent:**

Consent may be implied based upon the reasonable expectations of the individual. For example, if you provide personal information in response to a fundraising communication, consent may be implied for the purposes of using the information for fundraising. In determining the appropriate form of consent, Lupus Ontario will take into account the sensitivity of the personal information. Implied consent will generally be appropriate where the personal information is non-sensitive in nature and context.

### **7.2 Express Consent:**

Express Consent will always be sought should we wish to disclose your personal information to a third party, such as another charity.

**7.3** If your personal information will be used or disclosed for any additional purposes that are not outlined in this policy, Lupus Ontario will advise you of these new purposes before such use of disclosure, unless otherwise required by law.

## **8. Disclosure of Information**

We do not sell, trade or rent personal information to others. We may share information with third-party service providers who assist us in our operations, provided they agree to comply with our privacy standards.

Additionally, there are circumstances where a disclosure without consent is justified or permitted, for example in the context of a legal investigation or a request from law enforcement authorities.

## **9. Retention of Information**

Personal information is only retained as long as it is necessary and as required by law. Lupus Ontario may establish retention timelines for staff to follow and also periodically reviews its retention needs.

The retention period may extend beyond your relationship with us. When your personal information is no longer required for Lupus Ontario's purposes, the information is either physically destroyed or deleted.

## **10. Security Measures**

We take reasonable steps to protect personal information from unauthorized access, use, or disclosure. This includes physical, electronic, and procedural safeguards.

## **11. Compliance**

The President of Lupus Ontario will be responsible for compliance of this policy.

## **12. Policy Review**

To be reviewed every three years or when there are legislation changes which could affect this policy.

### **13. Changes to the Policy**

We may update the privacy policy from time to time. Any changes will be posted on our website.

### **14. Police Type – External**

### **15. More information**

More information about Lupus Ontario’s privacy policy can be obtained by, contacting the President at [info@lupusontario.org](mailto:info@lupusontario.org) or at the telephone number or address 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 Privacy Commissioner of Canada at [www.privcom.gc.ca/](http://www.privcom.gc.ca/)