

Saskatoon Food Bank & Learning Centre

Privacy & Confidentiality Policy

Policy 7.3: Privacy and Confidentiality

Saskatoon Food Bank & Learning Centre (SFBLC) is committed to safeguarding the personal information entrusted to us by our clients, donors, members, employees, and volunteers.

All new employees will be provided with the Employee Intake Package including the Confidentiality Agreement which must be signed and returned to the Director/Manager and kept in the personnel file in accordance with document storage policies.

SFBLC will manage personal information in accordance with the federal *Personal Information Protection and Electronic Documents Act (PIPEDA)*. This policy outlines the principles and practices we follow in protecting personal information.

Definitions:

The personal information collected: SFBLC collects only the personal information needed for the purposes of providing services to clients, including personal information needed to:

- Deliver requested products and services
- enroll a client in a program
- process charitable donations

Information about Clients:

- Personal information: information about an identifiable individual. This includes an individual's name; home address and phone number; age; sex, marital or family status; an identifying number; financial information; educational history; health etc.

Procedure:

- Under normal circumstances SFBLC collects client personal information directly from our clients.
- Collection of personal information from other persons with consent or as authorized by law may also occur.
- All clients are informed, before or at the time of collecting personal information, of the purposes for which we are collecting the information. The only time notification is not provided is when a client volunteers information for an obvious purpose (for example, producing a credit card to make a financial donation when the information will be used only to process the payment).
- Personal information is added to the client database and held in the strictest confidence. This information will not be sold, traded, or otherwise distributed to any other organization or third party.

- Consent: We ask for consent to collect, use, or disclose client personal information, except in specific circumstances where collection, use or disclosure without consent is authorized or required by law.
 - Consent may be assumed in cases where information is volunteered for an obvious purpose.
 - SFBLC assumes consent to continue to use and, where applicable, disclose personal information that was previously collected, for the purpose for which the information was collected.
- SFBLC will ask for explicit consent for some purposes and may not be able to provide certain services if there is an unwillingness to provide consent to the collection, use or disclosure of certain personal information. Where expressed consent is needed, the SFBLC will ask clients to provide consent orally (in person, by telephone), or in writing (by signing a consent form).
- Client may withdraw consent to the use and disclosure of personal information at any time unless the personal information is necessary to fulfill legal obligations.
- SFBLC will respect client decisions but may not be able to provide products and services if the necessary personal information is not consented to.
- SFBLC may collect, use or disclose client personal information without consent only as authorized by law. For example, consent may not be provided in the case of an emergency that threatens life, health, or safety.

Keeping SFBLC personal information safe:

- SFBLC makes every reasonable effort to ensure that personal information is accurate and complete. SFBLC relies on individuals to notify if there is a change to personal information that may impact access to programs/services.
- Employees are encouraged to make changes to personal information as they become aware of errors/omissions.
- Protection of personal information occurs in a manner appropriate for the sensitivity of the information.
- All reasonable efforts to prevent any loss, misuse, disclosure, or modification of personal information, as well as any unauthorized access to personal information, occur.
- All appropriate security measures when destroying personal information, including shredding paper records, and permanently deleting electronic records, are followed.
- SFBLC retains personal information only as long as is reasonable to fulfill the purposes for which the information was collected.

Access to records containing personal information:

- Individuals have a right to access their own personal information in a record that is in the custody or under the control of the SFBLC, subject to some exceptions.
- For example, SFBLC is prohibited by law to allow access to information that would reveal personal information about another individual.

Questions and complaints:

- All questions or concerns about privacy, access to personal information and/or consent should be directed to the Executive Director.

Information about Volunteers and Employees:

- SFBLC can collect, use, and disclose personal employee information without consent only for the purposes of establishing, managing or ending the employment or volunteer relationship.
- All current employees and volunteers are provided with prior notice about what information is collected, used, or disclosed and the purpose for doing so.
- All individuals who volunteer or are employed at the SFBLC are asked to sign a document agreeing to keep all client and donor information confidential.
- Personal employee information may, in some circumstances, include a Social Insurance Number, a performance **review**, etc.
- SFBLC will collect, use, and disclose personal employee information to meet the following purposes:
 - Determining eligibility for employment or volunteer work, including verifying qualifications and references
 - Establishing training and development requirements
 - Assessing performance and managing performance issues if they arise
 - Administering pay and benefits {paid employees only}
 - Processing employee work-related claims {e.g., benefits, workers' compensation, insurance claims} (paid employees only)
 - Complying with requirements of funding bodies
 - Complying with applicable laws (e.g., Canada Income Tax Act)
- SFBLC will only collect, use, and disclose the amount and type of personal employee information that is reasonable to meet the above purposes.
- The following is a list of personal employee information the SFBLC may collect, use, and disclose to meet those purposes:
 - Contact information such as name, home address, telephone number.
 - Criminal background checks, if required
 - Employment or volunteer information such as a resume {including educational background, work history and references}, reference information and interview notes, letters of offer and acceptance of employment, policy acknowledgement forms, background verification information, workplace performance evaluations, emergency contacts, etc.
 - Benefit information such as forms relating to applications or changes to health and insurance benefits including medical and dental care, life insurance, short- and long-term disability, etc. (paid employees only)
 - Financial information, such as pay cheque deposit information and tax-related information, including Social Insurance Numbers (paid employees only)
 - Other personal information required for the purposes of our employment or volunteer relationship.
- All employees and volunteers are informed of any new purpose for which we will collect, use, or disclose personal employee information, or we will obtain your consent, before or at the time the information is collected.

- SFBLC will obtain consent to collect, use and disclose your personal information for purposes unrelated to employment or volunteer relationship.

Information about Donors:

SFBLC will only request specific information from donors in order to complete a donation transaction or provide recognition for the donation. Personal information is added to the donor database. Personal information collected by SFBLC will not be sold, traded, or otherwise distributed to any other organization or business. We do not use personal information to conduct direct mail or phone solicitation campaigns without prior consent.

The electronic donation service requires that cardholders provide contact information including:

- Name, address, city, state or province/territory, postal code, country, telephone and email), and financial information (including name on credit card, credit card number and expiry date), and ordering information.
- Any credit card information is taken in a secure environment. SFBLC uses banking information in accordance with the privacy and security implemented by the financial institutions.

Information about Website Visitors:

The SFBLC website may collect information as visitors navigate through content. This information cannot identify specific individuals, rather it is the information provided by web browsers to the SFBLC web server. This may include such information as:

- Home sites, the IP address of the computer being used, domain type, and browser version.
- Browser information is automatically recorded as part of transmitting information over the Internet. SFBLC may use it to help display information in the best format for visitors and/or to evaluate the effectiveness of this website.

SFBLC may use cookies to facilitate the exchange of information from the visitor's Web browser to the SFBLC Web server. SFBLC does not use cookies to obtain any personal information, including visitor contact information.

If website visitors consent to provide SFBLC with personal information through any form(s) present on the SFBLC website, this information is not distributed or used by any third party.

Links to Other Websites:

SFBLC site may contain links to other websites that are independently owned and operated by third parties. These links are provided to SFBLC website visitors as a convenience only. These other websites may have unique privacy policies and are not governed by the SFBLC privacy policy. SFBLC is not responsible for the privacy practices or the content of any website(s) owned and operated by any such third parties.