



# Protection of Private Information

## Administrative Policy

### POLICY PURPOSE

To establish Central Food Network's commitment to collecting and using personal information responsibly, securely and fairly. To establish safeguards for the protection of personal information.

### POLICY STATEMENT

Central Food Network respects the privacy of our staff, volunteers, partners, donors, and website users. The purpose of this Privacy Policy is to inform you about our privacy practices, including how we collect, use, and disclose your personal information.

**Accountability:** Central Food Network is accountable for all personal information under its control.

**Personal Information We Collect:** "Personal information" means information about an identifiable individual as described under Canadian privacy laws.

Generally, personal information does not include any business contact information that is solely used to communicate with you in relation to your employment, business, or profession, such as your name, position name or title, work address, work telephone or fax number or work email address.

The organization may collect, use, and disclose different types of personal information depending on our relationship with you. Generally, we collect the following types of personal information (not all of which may apply to you):

- Identity information, such as your first and last name
- Contact information, such as your e-mail address, billing address and telephone numbers
- Financial information, such as your bank account number and payment card details

ADM010 Protection of Personal Info POLICY  
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Applies to: Board, Volunteer, Staff

- Comments, opinions or feedback you provide to us about our programs and services.
- Information that you provide when you interact with us on social media, such as your username, comments, and photos.
- Event participation information, such as your enrollment and attendance at our events.
- Marketing and communications information, such as your preferences for receiving our newsletter.
- Technical and usage information when you use our website, such as your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system, and platform and other technology on the devices you use to access our website.

We also collect, use, and share aggregated and anonymized data for the purposes of conducting research and statistical analysis about the need for our services. Aggregated and anonymized data is not considered personal information because it cannot be used to identify you.

**Purpose of Personal Information:** The purpose for which Central Food Network collects personal information will be identified at or before the time the information is collected. We generally use your personal information for the purposes of:

- Administering and providing client services and programs
- Administering memberships
- Communicating with you through our newsletter or other communication
- If you visit our website, to administer and improve your use of the website
- Registering for events
- Conducting research and analysis about program usage
- Responding to your inquiries or requests
- Improvement of the effectiveness and efficiency of our operations, services and programs, including to detect and prevent errors and fraud
- Investigating legal claims and protecting our rights, operations, or property
- Administering volunteer, staff and contractor programs
- Processing donations - and issuing tax receipts
- For such other purposes as you may consent to from time to time
- As otherwise required or permitted by law

Central Food Network will not use personal information for any other purpose than identified at or before the time of collection. We do not use your personal information to engage in interest-based or behavioral advertising of our services across third-party websites or service offerings. We will not rent, trade, or sell our mailing lists.

You have a variety of tools to control the information collected by cookies, web beacons, and similar technologies when you use our website. For example, you can use controls in your internet browser to limit how the websites you visit are able to use cookies and to withdraw your consent by clearing or blocking cookies.

**Consent:** - We collect, use, and disclose your personal information with your consent or as permitted or required by law. How we obtain your consent, including whether it is express or implied, will depend on the circumstances and the sensitivity of the personal information in question.

If you provide personal information about another individual to us, we ask that you first obtain the consent of that individual.

If you wish to withdraw your consent to our collection, use, or disclosure of your personal information, please contact us. We will accommodate your request to withdraw consent, subject to legal or contractual restrictions. Withdrawal of your consent may mean that we will no longer be able to provide you with certain services.

**Safeguarding Personal Information:** Central Food Network respects the privacy of our clients, members, partners, potential website visitors and internet users and will protect that privacy as vigorously as possible.

We generally identify to whom, and for what purposes, we will disclose your personal information (and we obtain your consent to such disclosure) at the time we collect your personal information.

We may disclose your information when we believe such disclosure is required or permitted by law.

We have implemented physical, organizational, contractual, and technological security measures in an effort to protect your personal information from loss or theft, unauthorized access, use or disclosure. For example:

- we train our staff and agents on the importance of safeguarding personal information
- we restrict access to your personal information to the staff, volunteers or agents who need access for authorized purposes
- we protect personal information in electronic form using technological means such as access controls and encryption.

Despite these measures, we cannot guarantee that our safeguards will always be effective. A breach of security safeguards can result in such risks as phishing and identity theft. In such cases, we will act to mitigate the risks and to inform you where there is a real risk of significant harm, or as otherwise required by law.

If you have reason to believe that your personal information is no longer secure, please contact us immediately

## **Retention, Storage, and International Transfer of Personal Information**

We will retain your personal information for as long as necessary to fulfill the purposes for which we collected it, and as permitted or required by law.

We rely on service providers to perform a variety of services on our behalf, such as payment card processors, technical support providers, and data storage and processing service providers. If we transfer your personal information to a service provider, we require that they maintain the confidentiality of your personal information and keep it secure. We also require that our service providers comply with applicable privacy laws and only use your personal information for the limited purposes for which it is provided.

We may transfer your personal information outside of Canada to fulfil the purpose for which we collected it, including for processing and storage by service providers. While your personal information is outside of Canada, it is subject to the laws of the country in which it is located, which may have different data protection laws than Canada. Those laws may require disclosure of your personal information to authorities in that country.

**Accuracy of and Access to Personal Information Collected:** Central Food Network makes every effort to keep personal information as accurate, complete, current, and relevant as necessary for the identified purposes. The organization does not routinely update personal information unless such a process is necessary.

**Withdrawal of consent for Marketing or Communications:** Any Central Food Network client, volunteer or subscriber can opt out of receiving direct communication such as email and mail by choosing unsubscribe or contacting our office. Please note that if you opt out from receiving our newsletter or other email updates, we may still need to send you communications about your donations, your use of our services or other matters.

**Right to request correction of personal information:** You have a right to request to review personal information about you that we have collected, used, or disclosed. You may also request corrections to any personal information that Central Food Network holds about you if there is any reason to think that information is inaccurate, out-of-date, incomplete, irrelevant or misleading.

When Central Food Network receives such a request it will take all reasonable steps in the circumstances to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading. We may require that you provide sufficient identification to fulfill your request to access or correct your personal information.

### **Third-Party Websites and Services**

We may provide links to third-party websites for your convenience and information. We may also make opportunities available to you to use or receive other products or services from third parties with different privacy practices. Those other websites, products, or services are governed by the privacy statements and policies of the respective third party. This Privacy Statement does not extend to any websites, products, or services provided by third parties. We do not assume responsibility for the privacy practices of third parties and we encourage you to review all third-party privacy statements prior to using third-party websites, products, or services.

### **How to Contact Us**

All comments, questions, concerns, or requests regarding your personal information or our privacy practices should be forwarded to our Executive Director at 705-448-9711 or [info@centralfoodnetwork.org](mailto:info@centralfoodnetwork.org)