



Donor Privacy

Purpose

To ensure that the privacy of all donors, volunteers, their business and personal information in the custody or control of Guelph Public Library (GPL) is protected in keeping with best practices and relevant legislation.

Policy Context

It is essential that GPL maintain the trust and confidence of its donors.

Protecting the privacy of their information is fundamental to maintain that trust and confidence. In that effort, we strive to embrace best practices, and therefore follow the principles of the Canadian Standards Association (CSA) Model Code for the Protection of Personal Information.

Additionally, GPL, is guided by the standards set out in the Imagine Canada *Ethical Fundraising and Financial Accountability Code* and the Association of Fundraising Professionals *Donor Bill of Rights*.

Personnel Affected

Board of Directors, volunteers, all staff.

1 Scope

1.1 This policy applies to all donor information collected and held by the GPL.

2 Donor Privacy Policies

2.1 Confidentiality Agreement

- 2.1.1 All volunteers will be required to sign a Confidentiality Agreement at the start of their engagements and every five years thereafter that confirms the volunteer's understanding of the Donor Privacy Policy and confirms that they agree to be bound by the policy while a volunteer with GPL.
- 2.1.2 All employees, including temporary, seasonal or part-time employees, will be required to sign a Confidentiality Agreement at the start of their employment and every five years thereafter, that confirms the employee's understanding of the Donor Privacy Policy and confirms that they agree to be bound by the policy as an employee of the of GPL. A copy of the signed Confidentiality Agreement is kept in each employee's file. An employee may be disciplined for any breach of the Donor Confidentiality Policy, up to and including termination of employment.

2.2 Personal Information

- 2.2.1 Information relating to donors will be held in confidence at all times and will not to be shared by any employee with any third-party individual or organization, without the explicit consent of the donor, whether verbal or written, other than to those persons who are authorized to receive such information. Employees will not share such information within the organization, except on a need-to-know basis.
- 2.2.2 When in doubt as to the confidentiality of certain information, no disclosure should occur without first establishing that such disclosure has been authorized by the Privacy Officer or the CEO or designate.
- 2.2.3 All reasonable precautions will be taken to ensure that potential contracts with service providers protect personal donor information. Service providers will enter into confidentiality agreements and will not keep any personal information for longer than required to complete their services. GPL will ask suppliers to confirm that the information has been deleted from their files upon conclusion of the required work and/or retention period.

2.3 Collection, Retention and Disclosure of Information

- 2.3.1 GPL collects, uses and discloses personal information from donors to identify and help them meet their philanthropic needs, process their donations, provide tax receipts, direct their gifts in the manner in which they choose, keep them informed about gift giving opportunities, recognize their philanthropic activities, and comply with federal and provincial legal and regulatory guidelines and reporting requirements.
- 2.3.2 GPL does not sell or trade donor information.
- 2.3.3 Personal donor information is kept only as long as it is necessary to satisfy the purposes for which it was obtained, or as required by law.

2.3.4 When destroying donor personal information, GPL will use safeguards to prevent unauthorized parties from gaining access to that information during the process.

2.4 Consent

2.4.1 The collection use or disclosure of donor personal information will be undertaken with permission. Permission may be expressed by the donor orally, in writing or may be implied.

2.4.2 Donors may withdraw permission to collect, use and disclose personal information at any time, subject to legal and contractual restrictions and reasonable notice.

2.5 Accurate Information

2.5.1 Appropriate procedures will be in place to ensure that personal donor information is accurate and up to date.

2.5.2 With written request and with reasonable notice, donors may access their own personal information and confirm its completeness and accuracy.

2.5.3 Donors are entitled to seek a correction of their personal information if they believe that the information is not correct.

2.6 Protecting Information

2.6.1 GPL will protect donor information from unauthorized access or use through physical and electronic security safeguards to the best of its abilities, and limit access to only authorized persons and only when necessary.

2.7 Registering Complaints

2.7.1 Donors may challenge GPL's donor privacy policies and practices with the organization's Privacy Officer, CEO or designate who will investigate, respond to complaints in writing, and take appropriate action, including amending information or updating the privacy policies and procedures.