

PRIVACY POLICY OF CATHOLIC CHARITIES OF THE ARCHDIOCESE OF TORONTO

Catholic Charities of the Archdiocese of Toronto (“Catholic Charities”) is committed to protecting the privacy of individuals about or from whom we collect personal information as well as the privacy of information about individuals that is received by us in the course of carrying out our mandate.

Catholic Charities embraces the principles of the Canada Model Code for the Protection of Personal Information (the “Model Code”) to ensure that all personal information is properly collected, used only for the purposes for which it is collected and is retained and disposed of in a manner that safeguards the privacy that we are committed to protecting.

As a not for profit organization incorporated under the laws of Ontario dedicated to promoting the active participation of the Catholic population of the Archdiocese of Toronto in the planning, formation, development and provision of charitable services, we do not collect, use or disclose any personal information in the course of a commercial activity. Furthermore, as we do not operate a federal work, undertaking or business, the Personal Information Protection and Electronic Documents Act (“PIPEDA”) does not apply to our activities. We are, nevertheless, committed to following the principles of the Model Code upon which PIPEDA is based because such principles inform and their implementation form the basis of sound management practices, principles that reflect gospel values that form the very basis of our work.

PRIVACY PRINCIPLES

In carrying out our mandate and our commitment to protecting privacy of individuals about or from whom we collect personal information the following principles shall apply:

1. We are accountable for personal information.

We are responsible for all personal information in our possession.

All of our employees and volunteers are required to protect the confidentiality of such personal information and the Executive Director of Catholic Charities has been designated as the “Privacy Officer” responsible for ensuring compliance with this privacy policy.

2. Identifying purposes for collection of personal information

- (a) Individuals voluntarily supply us with personal information to support their application for employment by Catholic Charities or for a volunteer position with Catholic Charities or for the purpose of being referred for a volunteer position with one or more of our member agencies.
- (b) Employees of Catholic Charities and the employees of our member agencies provide personal information including personal health information in connection with the provision of the Pension and Benefits Plan administered by Catholic Charities on behalf of its employees and the employees of its member agencies.

- (c) Individuals who turn to us seeking social/financial/health assistance supply us with personal information to enable us to refer them to a more appropriate source for the assistance being sought.
- (d) Individuals voluntarily supply us with personal information when making donations. Such information is used solely for the purpose of issuing charitable income tax receipts. Information regarding donors is never sold to or shared with third parties, except for those donations which are received by us for and delivered to ShareLife, the fundraising arm of the Archdiocese of Toronto, in which case the personal information supplied by the donor is shared with ShareLife and used by ShareLife solely for the purpose of issuing charitable income tax receipts and maintaining its donor list.
- (e) During the course of a review of a member agency, or while providing assistance to a member agency or in carrying out any investigatory process in regard to incidents involving member agencies we may obtain or collect personal information. Such information will be used solely for the limited purpose for which it was obtained or collected, namely for the purpose of the review of the member agency, the provision of the assistance that had been sought or to investigate and assist in the resolution of any complaint or incident that may have been referred to us.

Any personal information that is obtained is obtained lawfully and fairly. The personal information that we collect will be limited to the extent practically possible to that which is required for the purposes that have been identified by us at the time of collection. When personal information is provided to us voluntarily, we will attempt to limit the collection of personal information to the purpose for which it is being voluntarily given to us.

3. Obtaining Consent

We collect, use or disclose your personal information with your permission.

Your permission may be either expressed or be implied. It may be expressed either in writing, orally or electronically. It will be implied when given voluntarily by you.

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

Prior to the disclosure of your personal information to any third party, we would obtain your informed consent to its disclosure and to the precise information that may be disclosed under such consent unless we are required by law to disclose such personal information to a third party. In instances where disclosure of personal information to a third party is required in the normal course of our activities, we will take all reasonably precautions to ensure that such third party also protects the privacy of your personal information and that it limits its use of it solely for the purpose for which it was given to such third party. By way of example, personal health information about an employee of Catholic Charities or any of its member agencies may be disclosed to an external consultant who provides pension and benefits services to the employees enrolled in the pension and benefits plan.

4. Limitation on collection

Catholic Charities will limit the amount and type of information collected from individuals to that necessary for the purposes for which it has been collected. Furthermore Catholic Charities will attempt to limit the amount and type of information that is voluntarily provided by individuals to that which is necessary for the purpose for which it is being voluntarily given.

The website of Catholic Charities has been designed so that it does not allow for the collection of personal information. The website does contain links to other websites which may or may not collect personal information and for which collection Catholic Charities is not accountable.

5. Limitations on use, retention and disclosure

We do not sell your personal information.

We do not disclose your personal information to any third party for the purpose of the sale by such third party or anyone else of your personal information.

The use and disclosure of any personal information is limited to the purpose for which it was originally collected or obtained unless such individual gives his or her consent to its use and disclosure for any other purpose. There may be exceptional circumstances under which Catholic Charities would be required by law to disclose personal information without an individual's consent however such disclosure would only be made where the legal requirement to do so supercedes and is not subject to this privacy policy.

Personal information will be retained only for so long as it is necessary to satisfy the purposes for which it was collected or obtained or for such longer period as may be required by law.

When we destroy personal information we will use safeguards to prevent unauthorized parties from gaining access to that information during the destruction process.

6. Maintaining Accuracy

Catholic Charities will strive to keep personal information as accurate, complete, current and relevant as necessary. Any individual whose personal information we have in our possession is entitled to make a correction of such information if in fact the information that we have collected or obtained requires correction or updating. Unless the purpose for which the information is being collected and used dictates the need for us to verify the accuracy of such information, Catholic Charities will not routinely verify the currency and accuracy of such personal information.

If you believe that any information we have collected or obtained about you is incorrect or incomplete, you have the right to ask us to change it or delete it and Catholic Charities will make the necessary changes.

7. Security safeguards

Catholic Charities will protect your personal information by means of safeguards that are appropriate to the sensitivity of that information. Catholic Charities maintains appropriate technical and organizational safeguards to protect personal information against loss, theft, unauthorized access, disclosure, copying, use or modification.

Access to any personal information is restricted to the employees of Catholic Charities and its volunteers on a “need to know” basis.

8. Openness as to Policies and Practices

Catholic Charities will make readily available information about its policies and practices relating to the management of personal information subject only to ensuring that the disclosure of our practices does not compromise the safeguards that have been put in place to protect the personal information.

9. Access

Upon the request of an individual, Catholic Charities will advise such an individual as to whether or not we have in our possession any of his or her personal information. If Catholic Charities has in its possession any information about such an individual, Catholic Charities will on request advise such individual of the source of the information, the specific use to which such information is being put, to whom it has been disclosed or, in certain cases, transferred for processing. Any such individual will also have the right to see the information.

10. Challenging Compliance

Any privacy – related complaints involving compliance with this policy and the practices and procedures of Catholic Charities in the handling of personal information may be addressed to the Executive Director of Catholic Charities at 416-934-3401 ext. 418 or by email at mfullan@catholiccharitiestor.org or by mail at 155 Yonge Street, Suite 400, Toronto, Ontario M4T 1W2 addressed to the attention of the Executive Director. Catholic Charities will investigate all complaints and if justified, will take all appropriate steps to repair the situation and if necessary change its policies and practices.