

## Privacy Policy

### 1 – Privacy Commitment: We are committed to your privacy

United Way of Greater Toronto (“UWGT”, “we” or “us”) seeks to meet urgent human needs and improve social conditions in the Greater Toronto area by mobilizing the community’s volunteer and financial resources in a common cause of caring. We deeply value the trust that the community has placed in us, and we work tirelessly to ensure that this trust will always be well founded, including trust in relation to the handling and management of personal information.

UWGT recognizes that we rely on the support of hundreds of thousands of individuals and we support those in need, who engage with us. We recognize that information is precious, and our supporters and other constituents trust us to treat their information with respect for their privacy and a commitment to protecting the confidentiality of data. It is essential that we protect the privacy of the personal information individuals may choose to share with us or that we may gather by other lawful means.

This policy outlines UWGT’s commitment to respecting the privacy of personal information of individual persons and helps you understand how we collect, access, use, retain, protect, disclose and dispose of personal information.

### 2 – Application of this Policy: This policy applies to UWGT services and channels in its Canadian operations

#### 2.1 Information

This policy applies to personal information, including the personal information of prospective, current and past donors, board members, volunteers, individuals who engage with us on community initiatives, and our staff.

Personal information refers to information about an identifiable individual. It may include details such as your name, contact details, donation information, and transaction records. Personal information may be factual or subjective, as well as recorded or not. It excludes certain business contact information, specifically name, title, business address or telephone number of an employee of an organization, when used for business purposes.

#### 2.2 Activities, Operations, Services, and Channels

This policy applies to all activities, operations and services of UWGT and to all the channels through which we operate and provide those services, including by phone, our website, and events.

UWGT is an autonomous organization, legally separate from United Way of Canada and other United Ways. While all United Ways share a commitment and respect for personal information

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privacy, details on how each United Way does so can be obtained by contacting the United Ways individually.

### 2.3 Minors

Occasionally, we may collect the personal information of minors, as appropriate, for instance, as volunteers. In certain circumstances, we may request the consent of a parent or guardian of that minor child to collect that information.

## 3 – Privacy Principles: UWGT embraces the principles of the Canadian Standards Association Model Code for the Protection of Personal Information and manages the collection, access, use, retention, disclosure and disposal of personal information in keeping with those principles

The following principles reflect our pledge to protect the privacy of your personal information.

### A. Accountability

We are responsible for all personal information in our possession, including any personal information transferred to third parties for handling or administrative purposes. UWGT's Chief Privacy Officer establishes and oversees appropriate privacy practices and governance.

All employees, agents (including authorized volunteers) and authorized service providers of UWGT are required to protect the confidentiality of your personal information. All employees and agents are required to sign and adhere to a Code of Conduct & Ethics which ensures they are informed about the importance of privacy protection. UWGT provides employees and agents with periodic information to ensure they are knowledgeable about our privacy policy, related policies, and privacy developments.

Where we choose to have certain services, such as data processing, provided by third party service providers, we select the service providers carefully. We take all reasonable precautions to ensure that the service providers protect your personal information. These service providers enter into agreements with UWGT that confirm they have privacy and security standards comparable to our own.

### B. Identifying Personal Information

We only collect the personal information that we determine we need for identified purposes below. We may collect relevant information, including your:

- Name.
- Contact Information including telephone number, postal address, and email address.
- Identification Documents.

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- Date of Birth.
- Donor Information.
- Event or Program Participant Information.
- Employee Information.
- Volunteer Information.
- Transaction Information.
- Communications including when you communicate with us or respond to communications from us via email, chat, audio or video calls, or physical documents.
- Device Information such as information about your operating system, browser, software applications, IP address, geolocation, security status and other similar device information to improve your experience, to protect against fraud, and manage risk.
- Website Use Information, such as browsing behaviour on the UWGT website and links, as well as other data gathered from the use of web tools (for example, cookies) to better understand your interests and needs so that we can serve and support you better.

We obtain personal information about you lawfully and fairly. We may collect personal information about you when you voluntarily provide it to us, from third parties, and/or from sources that are available to the public. You can choose not to provide us with certain information in some situations, but if you make this choice, we may not be able to address your needs. We collect, use and disclose personal information only for certain purposes that we identify to you. The purposes for which we collect the personal information are identified at the time we collect it.

We may use cameras or other recording devices in and around our premises, in online meetings, and other locations for business activities and the security of our people and property.

From time to time, UWGT may, acting reasonably, collect information about identifiable individuals from published or public sources for the purposes of developing relationships with individuals.

### C. Identifying Purposes

With your consent, we collect information about you for various purposes, including to:

- Establish and verify your identity.
- Ensure we have accurate and up to date information about you.
- Administer your involvements with us, including your donations, event participation, certain networking and mentoring programs, community engagements, volunteering, or employment, and contact you about your continued involvement.
- Process your transactions, including processing donations and payments, redirecting a donation or any part of a donation to another charity as instructed by the donor, issuing tax receipts, confirming renewal of giving and maintaining a donation history.

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- Support workplace organizations who engage us to run internal employee giving and engagement philanthropy programs which may include information of employees, retirees or contractors of those organizations.
- Engage and manage prospective, current, and past donor relationships.
- Establish and maintain the volunteer relationship, including to assist volunteers in performing their volunteering roles and responsibilities and to keep them informed about relevant UWGT activities and the work of UWGT.
- Know who our donors, volunteers and other supporters are and understand their needs in order to manage and develop our resources to fulfill our mission to serve the greater good of the community.
- Respond to your information requests.
- Communicate with you, like sending you literature on United Way or invite you to events or information sessions, about issues and events that may be aligned with your interests
- Thank you for your contributions.
- With your consent, publicly recognize your financial or non-financial contributions.
- Share information with other individuals or organizations, including organizations which you redirect donations to, volunteer at on our behalf, or interact with on our behalf.
- Generate statistics and aggregate reporting to help us and our partner organizations understand where we can have greater impact on the community.
- Establish, maintain, administer and terminate the employment relationship including ongoing obligations regarding benefits, medical history and pension.
- Meet legal and regulatory requirements and inquiries.
- Investigate legal claims.
- Protect you and us against fraudulent actors, behaviours and transactions.
- Protect UWGT against other legal, regulatory, financial, or business risks.
- Use it as otherwise permitted by law.

### D. Consent

**Privacy Consent:** We collect, use or disclose your personal information with your permission, except where otherwise required or permitted by law. Your permission may be expressed (orally, electronically or in writing) or may be implied (by an action or inaction).

**Your Choices:** During your relationship with us, we may communicate with you using the contact information you have provided, to inform you about UWGT issues, activities and opportunities that we think may be of interest and value to you.

**Changing or Withdrawing Consent:** You can manage or withdraw your privacy consent and communication preferences at any time to opt out of some or all of these consents and communications by reaching out to us. To manage your privacy consent and communication preferences, you can reach us by phone, email, or postal mail. For communication preferences, you have the additional option to visit our online preference center.

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We will comply with your change or withdrawal, subject to legal, contractual or technical restrictions. For example, if you ask to not receive any mail from us, we take steps to suppress donation requests or general information, but we will still mail you a tax receipt for a donation or send you a statement of your outstanding payments against your pledged donation. Due to printing and distribution schedules, you may continue to receive some communications that were in process before we received your request. If there are various options to how we may handle your request, we will explain the options so that you can choose how you wish us to handle your request.

### E. Limiting Collection

Personal information we collect will be limited to that required for the purposes identified by us.

### F. Limiting Use, Disclosure and Retention

**Use:** We use your information for the purposes identified to you. When we intend to use your personal information for a purpose not identified to you when the information was collected, we will identify the new purpose and obtain your permission prior to use.

We do not sell your personal information.

**Disclosure:** We disclose your personal information limited to the following circumstances:

- In the case of donors giving through their workplace, your workplace has access to certain personal information in the execution of the Employee Campaign. UWGT is respectful of the donor's right to privacy and works with the individuals responsible for the Employee Campaign to limit with whom we share the information, and to only share information necessary for the purposes of the campaign. For example, if you make a donation by payroll deduction, we may provide the information necessary to correctly identify you on your payroll system and the amount of your donation to deduct from your pay. Furthermore, employers may have internal policies on their access and use of employee personal information; United Way respects and works within the requirements of your organization's policies.
- We share information with other United Ways if we administer a donation belonging to another United Way community. We disclose your information only to the specific United Way involved in your donation.
- If you designate your donation to another charity, we provide your name, workplace if the donation is part of an Employee Campaign, and designation amount to the selected charity. You may withdraw permission by contacting us. If you do so, we send the donation on an anonymous basis.
- We may contract with carefully selected third parties to perform services for us or on our behalf. When we select the third parties, we ensure that they use security and privacy standards comparable to our own. When we allow those third parties to access personal information, it is limited only to that which is needed for the third party to complete their contractual obligations to UWGT. Those third parties are not entitled to use or disclose personal information for their own marketing or other purposes.

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- Where a third party hosts an event using UWGT's systems to register participants, your information may be shared with the host solely for the purposes of managing the event and your participation in the event.
- We may release personal information to legal or regulatory authorities or law enforcement in cases of suspected or actual criminal activity or contravention of law, for the detection and prevention of fraud, or when required to satisfy the legal or regulatory requirements or governments, regulatory authorities, or their self-regulatory organizations, or to comply with a court order or for the protection of our assets.
- In the event of a reorganization, merger, or other change in corporate control, we may transfer associated personal information,
- In all other situations, we will disclose your personal information only with your consent, or as otherwise required or permitted by law.

**Retention and Storage:** We will keep your personal information only as long as it is necessary to satisfy the purposes for which it was obtained, or as required by law. We have guidelines and procedures for the retention and destruction of personal information. When we destroy personal information, we will use safeguards to prevent unauthorized parties from gaining access to that information during the process.

As your personal information is retained, we store the personal information that we collect electronically on premises at the UWGT offices in Toronto, or at the offices of our third party service providers, as applicable. As such, your personal information may in some circumstances be stored in a jurisdiction outside of the one in which you reside, but we ensure that your personal information is protected in accordance with the data protection requirements of that jurisdiction.

### G. Accuracy

We maintain appropriate procedures to ensure that personal information in our possession is as accurate and up to date as is necessary for the purposes for which it is to be used. We rely on you to provide us with any changes to your personal information, and in particular to your contact information. Failure to notify us of changes to your personal information may negatively impact the way we communicate with you, transact with you, and/or fulfil our legal and regulatory obligations.

If you believe any of the information which we have collected about you is incorrect or incomplete, you have the right to ask us to change it or delete it. If your personal information is inaccurate or incomplete, we will make the necessary changes. Where appropriate, we will transmit any material amendments to your personal information to our third party service providers with need for your personal information.

### H. Safeguards

We keep your personal information in strict confidence. We maintain appropriate physical, technical and organizational safeguards to protect your personal information against loss, theft, unauthorized access, disclosure, copying, use or modification.



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Access to your personal information is restricted to UWGT employees, agents and authorized service providers who need the information to fulfill the purpose for which the information was collected. UWGT will protect your personal information by safeguards that are appropriate to the sensitivity of that information and the format of the information, whether electronic or physical.

Our procedures include physical security measures, organizational measures including security clearances and limiting access on a "need-to-know" basis, and technological measures such as the use of passwords and encryption. When it comes to the handling of electronic records for payment purposes, UWGT adheres to Payment Card Industry Data Security Standards (PCI DSS).

You are also responsible for helping to protect the security of your personal information. For instance, safeguard any sensitive records you have in connection with UWGT, like donation information and transaction records.

### I. Openness

We are open about our practices relating to the management of personal information. UWGT's Privacy Policy is available to you at all times on our website. If you are unable to access our website or require our policy in another format, we will do our best to provide it in an alternative format that meets your requirements.

### J. Individual Access

You may ask whether we hold any personal information about you, how we collected your personal information, how we are using it, and which third parties have access to it. You may request to see copies of your information we collected and ensure that it is accurate. UWGT may ask that you submit your request in writing with sufficiently specific information to enable us to search for and provide you with personal information we hold about you. UWGT will need to confirm your identity prior to disclosing any information to you and may charge a reasonable fee to cover the cost of providing the information to you. If a fee is charged, UWGT will inform you of the approximate cost prior to providing the information to you.

UWGT seeks to respond to access requests in a reasonable amount of time, subject to the complexity, volume, and sensitivity of the request. We will inform you of the specifics to the best of our abilities, to the extent required by law.

Where we are able to fulfil your request, we will make the personal information or the information about your personal information available to you in a form that is generally understandable. If we are unable to provide any of the requested personal information, we will tell you why.

### K. Provide Recourse and Contacting Us

UWGT has appointed a Chief Privacy Officer who is responsible for this Privacy Policy and our compliance.

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If you have any privacy concerns or requests, you may contact any of our employees with whom you normally interact to discuss your concerns or requests. If you are unsure of whom to contact or have further concerns, you may contact the office of our Chief Privacy Officer by email to [privacy@uwgt.org](mailto:privacy@uwgt.org).

You may register a privacy-related complaint by emailing UWGT's Chief Privacy Officer. We will investigate all complaints. If an objection is justified, we will take all appropriate steps to repair the situation, including changing our policies and practices if necessary.

### 4 – Online and Mobile Practices: UWGT upholds transparent privacy practices in the online and mobile environment

We collect two basic types of personal information on our online and mobile environments, including our websites:

- Personal information which you submit, for instance, when you provide it to us by participating in certain activities that require response, registration or donations; and
- Information about your interaction with our websites using digital markers such as cookies and web beacons.

When you visit our websites, we also automatically log information about your visit. The information collected about your visit includes, but is not limited to:

- The current Internet protocol (IP) address and the type of computer operating system you are using (e.g. Microsoft Windows or Mac OS).
- The type of browser you are using (e.g. Firefox or Internet Explorer).
- Attributes related to the device and browser you are using to connect to our website or applications (e.g. current language, browser version and plug-ins, screen resolution etc.).
- The referring website that brought you to the UWGT website.
- Your UDID (for mobile devices), Your Internet Service Provider (ISP) and the Region from which you are connecting to our website or applications.
- The domain name of your Internet Service Provider.
- Your activities while visiting the Website (e.g. which of our Web pages you viewed).

**Cookies and Other Digital Markers We Use:** Cookies are a string of data sent between a server and a web browser to, for example, help facilitate the use of a website and to help understand how a website is being used. Different types of cookies are used for different types of activities. Examples of cookies we may use are:

- *Session cookies* enable the website you are visiting to keep track of your movement from page to page. Session cookies allow you to proceed through many pages of a site quickly and easily. These



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cookies do not gather PI about you that could be used for [insert right word] or remembering where you have been on the Internet.

- *Persistent cookies* help websites remember your information and settings when you visit them in the future, and help us provide you with a more personalized experience when you are using our websites. Persistent cookies are stored on your computer.
- *Third Party cookies* and other services, such as Google Analytics. These cookies collect information and the information is used to analyze the performance and effectiveness of our website, for technical reasons to facilitate navigation through our website and to present personalized content. For example, in order to navigate through our online campaign tool, our Web server must recognize you in order to ensure that your donation is correctly applied and that you are able to navigate securely through the pages related to the campaign
- *Pixel Tags, Web Beacons and similar technologies* are tracking tools that may be used on our website that, when combined with cookies, monitor user activity. They help us capture user activity for analysis to better understand the use and effectiveness of the website, enhance user experience and provide additional security controls. We do not collect any PI through these tools. For instance, UWGT uses technical methods for tracking purposes, including clear gifs (also known as web beacons) in HTML emails that we send to determine whether you have opened those emails and/or clicked on links in those emails. UWGT uses this information to analyze the performance and effectiveness of our emails.

**Opting Out of Cookies and Other Digital Markers:** Cookies are a commonly-used technology and many web browsers default to automatically accept cookies. If you decide that you do not wish to accept cookies, refer to your browser's online help for further instruction and information on setting cookie preferences.

You may adjust your browser settings to reject a range of digital markers, including cookies, if you so choose. Visiting our website with cookies disabled will have no significant impact on your ability to view our websites. However, session cookies must be enabled to use [UnitedWay@Work](mailto:UnitedWay@Work), our online campaign tool used to support workplace campaigns.

The ability for UWGT to collect certain personal information is controlled by your device. Please review the settings on your device to manage your preferences.

You may be able to disable Web beacons in email messages by not downloading images contained in the message you receive (this feature varies depending on the email software you use).

Event registrants and donors on our websites including [UnitedWay@work](mailto:UnitedWay@work), our online campaign tool used to support workplace campaigns, are linked to secure servers. UWGT uses a secure payment service for credit card transactions.

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**Third party links on our website:** Our website or communications with you may contain links to other websites that UWGT does not own or operate. Also, links to our website may be featured on third party websites. We provide links to third party websites as a convenience to you. These links are not intended as an endorsement of, or referral to, the linked websites. The linked websites have separate and independent privacy statements, notices and terms of use, which we recommend you read carefully. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat your personal information

### 5 – Changes to this Privacy Policy: We update our policy and recommend you review it periodically

UWGT may at any time, without notice to you and in its sole discretion, amend this policy from time to time. The most current version of this Privacy Policy is found on UWGT’s website.

### 6 – Related Policies

- Code of Conduct & Ethics Policy.
- Conflict of Interest Policy.
- Whistle Blower Policy.
- Complaints Policy for Members of the Public.
- Policy on Complaints Regarding Member and Funded Agencies.
- Risk Management Policy.
- Anti-Spam Policy.
- Information Security Policy Framework.
- Hybrid Policy.

### 7 – Related Procedures

- Privacy Policy Refresher.
- Privacy by Design Playbook.
- Cybersecurity Playbook.
- Information Security Awareness Handbook.
- Employee Hybrid Handbook.