 Acclaim Health	COMMUNITY ENGAGEMENT MANUAL
SECTION 1	DEPARTMENT
Fundraising	Community Engagement
POLICY NAME	POLICY #
Donor Privacy	CEP 01-05-03

Purpose

To ensure all donor information is collected, used and disclosed in accordance with applicable privacy legislation.

Definitions

“Donor” is any person who makes, or who indicates to Acclaim Health an intention to make a donation to Acclaim Health.

"Personal Information" is any information, recorded in any form, about an identified individual that may include: first name, last name, mailing address, credit card or banking information, email address and telephone number.

Scope

This policy applies to all Acclaim Health employees and volunteers who interact with donors and/or handle funds from donors.

Policy

Acclaim Health is committed to respecting the privacy of donors.

Acclaim Health uses the verbal or written personal information provided by donors to:

- Conduct and facilitate fundraising and appeals
- Manage our relationship with donors
- Meet any legal or regulatory requirement relating to the above or to the activities of Acclaim Health
- Other purposes consistent with the above

Consequences


Failure to comply with this policy results in progressive disciplinary action up to and including termination.

Procedure

1.0 Sharing of Personal Information

1.1 Acclaim Health does not sell, rent, exchange or otherwise share its donor list.

1.2 Acclaim Health honours all donor requests to remain anonymous.

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1.3 Acclaim Health does not provide or share an individual donor's personal information with third parties unless it meets one of the following criteria:

- Donor has granted his/her express consent
- Acclaim Health must share this information in order to process a donation (for example, to process a credit card transaction)
- Acclaim Health is required to by law

1.4 In situations where we are obliged to disclose information without consent, we do not disclose more information than is required in the applicable circumstances.

2.0 Accuracy

2.1 Acclaim Health endeavours to ensure that any personal information provided by donors and in its possession is as accurate, current, and complete.

2.2 An individual who believes their personal information is incorrect may request an update of the information. Acclaim Health reserves the right not to change any personal information but will append any alternative text the individual concerned believes appropriate.

3.0 Retention

3.1 Acclaim Health keeps personal information for as long as it is useful and/or required by law. The organization takes reasonable steps to destroy, delete, or erase personal information which is no longer required.


4.0 Security

4.1 Acclaim Health endeavours to maintain adequate physical, procedural, and technical security with respect to our offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of personal information.

4.2 Acclaim Health limits personal information access and the ability to change such personal information to those employees and volunteers who have so been deemed responsible to view this information.

5.0 Access to Personal Information

5.1 Acclaim Health permits access to and review of personal information by the individual concerned. We require sufficient information to confirm the identity of the person making the request before granting access. We endeavor to provide the information within a reasonable time frame.


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5.2 We reserve the right to decline access to personal information where disclosure of the information requested where such information:

- Is not readily retrievable and the burden or cost of providing it would be disproportionate to the nature or value of the information
- Does not exist, is not held, or cannot be found
- Is required not to be disclosed on any legal ground
- Is permitted by law not to be disclosed

5.3 Where information is not or cannot be disclosed, the individual making the request will be provided with the reasons for non-disclosure.

Adopted: April 2010
Reviewed: August 2018
Revised: August 2013, November 2014, April 2021
References: *Donor Bill of Rights* (Association of Fundraising Professionals) and *Code of Ethical Principles and Standards* (Association of Fundraising Professionals)

Approved by	Signature	Date
Chief Executive Officer		May 25, 2021