



Prince's Trust Canada
La Fondation du prince au Canada

President – HRH The Prince of Wales
Global Founding Patron – HH the Aga Khan

Président – SAR le prince de Galles
Mécène fondateur mondial – SA l'Aga Khan

PTC Privacy Policy

Policy

The Prince's Trust Canada (PTC) respects the right of individuals and the protection of their personal information. This privacy policy was developed in accordance with our values as a national charity, ICARE which stands for inspiration, community, action, responsibility and empathy and the applicable privacy legislation in Canada.

Procedure

Protecting the Privacy of Personal Information:

PTC is committed to maintaining the confidentiality, privacy, and accuracy of personal information it collects, uses and discloses about its participants, partners, donors, staff, volunteers, independent contractors and suppliers.

PTC shares in the concern that people have about their ability to exercise a degree of control over the collection, use and disclosure of their personal information.

Personal information is information about an identifiable individual, where an individual can be a participant, partner, donor, staff member, volunteer, independent contractor or supplier. Examples of personal information include, but are not limited to, name, address, gender, age, ID numbers, income, racial or ethnic origin, relationship status, employee files, payment or medical/health records, assessments or evaluations. An individual's name does not need to be attached to the information in order for it to qualify as personal information.

PTC staff and volunteers having access to personal information must follow the ten fair information principles and steps for implementing these principles, in keeping with privacy legislation.

Principle 1 - Accountability

PTC is responsible for personal information under its control and shall designate an individual or individuals who are accountable for PTC compliance with established privacy principles.

The Programming, Philanthropy and Communications Teams and Controller are all responsible for and shall oversee compliance by their staff with PTC privacy protection procedures and fair information principles, to ensure:

1. Purposes are defined for collection of personal information;
2. Informed consents are obtained;
3. Collection, use and disclosure of personal information is limited;
4. Information used is accurate, complete and up-to-date;
5. Adequate safeguards protect personal information in PTC's control;
6. Retention and destruction timetables are maintained;
7. Access requests by individuals are processed promptly;
8. Timely response is provided to an inquiry or complaint regarding PTC's handling of personal information.
9. Contracts with third parties that process PTC information shall include privacy protection requirements.

Each of the teams are responsible for the collection, processing and safeguarding of personal information under their control. The Controller shall inform and train staff, and volunteers having access to personal information, on PTC's privacy protection procedure and information handling practices.

Staff and relevant volunteers shall follow the privacy protection procedures established by PTC when collecting, using, disclosing and safeguarding personal information.

Upon request by an individual, staff and volunteers shall direct the request to the Controller, who addresses inquiries or complaints about PTC's privacy protection procedure and practices.

The contact information of the Privacy Officer for PTC is provided below:

Controller and Head of Operations

401 – 1255 Bay Street

Toronto, ON M5R 2A9

Tel: 647-355-3112

E-mail: comments@princestrust.ca

Principle 2 - Identifying Purposes

PTC shall identify the purposes for collecting personal information before or at the time personal information is collected.

PTC needs to collect, use and disclose some information about its participants, partners, donors, staff and volunteers, in order to conduct its operations, and deliver PTC programs and events to the communities it serves.

PTC's purposes for collecting personal information are:

1. To establish and maintain responsible relationships with its participants, partners, donors, staff, volunteers, independent contractors and suppliers;
2. To manage, develop and enhance PTC operations, programs and events;
3. To acknowledge gifts, issue tax receipts, and other administrative requirements including information requests;
4. To process and collect fees for service;
5. To assess participant needs;
6. To determine program, event, employment or volunteer eligibility;
7. To provide safe and secure PTC environments;
8. To collect data for internal PTC measurement and evaluation requirements;
9. To better understand the changing needs of communities we serve;
10. To communicate a range of programs, events and philanthropic opportunities that benefit people we serve;
11. To meet legal, regulatory and contractual requirements.

PTC shall indicate either orally, electronically or in writing, before or at the time personal information is collected, the purpose for which it is being collected.

Unless required by law, staff and volunteers shall not use or disclose for any new purpose personal information that has been collected, without the consent of the individual. Staff shall advise their Program Manager of a potential new identified purpose. Any new identified purpose must be approved by the Controller, documented and consent reobtained from each individual impacted prior to PTC use or disclosure.

Principle 3 - Consent

The knowledge and consent of an individual is required for the collection, use, or disclosure of personal information, except where not required by law (see Exceptions).

In obtaining consent, staff and volunteers shall advise participants, partners, donors, staff, volunteers, independent contractors and suppliers of identified purposes for which personal information will be used or disclosed. Purposes shall be communicated in clear, understandable language.

PTC takes into account the sensitivity of the personal information when determining what form of consent is appropriate for the circumstances.

In general, the following actions by an individual constitute implied consent for PTC to collect, use and disclose personal information for purposes identified to the individual:

1. registration for programs and events including media consent;
2. completion of a donation pledge form;
3. acceptance of employment and benefits enrollment by an employee;
4. acceptance of a volunteer position.

For certain funding agreements, PTC is obligated by its contract with the government and other supporters to obtain the express written consent from a participant to collect, use and disclose their personal information.

Express consent is required from an individual when dealing with more sensitive information, such as financial, criminal and medical data. Speak with your Program Manager or Controller for more information about when express consent is required in your program or service area.

Individuals may at any time withdraw their consent to PTC's use or disclosure of their personal information, subject to certain service, legal or contractual restrictions. Individuals wishing to withdraw consent may contact PTC for more information regarding the implications of withdrawing consent at comments@princestrust.ca.

Exceptions

PTC may collect, use or disclose personal information without prior knowledge or consent of the individual in the following limited circumstances:

1. To a lawyer or other legal representative of PTC, when legal advice is required by the organization;
2. To a government body or agency in certain circumstances;
3. To collect a debt, or comply with a subpoena, warrant or other court order, or as may be otherwise required by law;
4. When the collection, use or disclosure of personal information is permitted or required by law.
5. When the personal information is available from a public source (e.g., a telephone directory);
6. In an emergency that threatens an individual's life, health, or personal security;
7. To protect ourselves from fraud;
8. To investigate an anticipated breach of an agreement or a contravention of law

Principle 4 - Limiting Collection

PTC shall limit the collection of personal information to what is necessary for the purposes identified by PTC. Information shall be collected by fair and lawful means.

When collecting personal information, staff and volunteers will collect it directly from or through an organization who has been authorized by the individual verbally, in writing and/or electronically.

Principle 5 - Limiting Use, Disclosure, and Retention

PTC shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained for at least a year and after which for only as long as necessary for the fulfillment of those purposes.

Personal information used to make a decision that directly affects an individual must be retained for at least one year, after which it shall be retained only as long as necessary for the fulfillment of those purposes for which it was collected, or as required by law, or by contract with a funding partner.

Depending on the circumstances, where personal information has been used to make a decision about an individual, PTC shall retain, for a period of time that is reasonably sufficient to allow for access by the individual, either to actual information or the rationale for making the decision.

Program, Philanthropy and Communications Managers and the Controller shall maintain schedules for records retention and destruction, which apply to personal information that is no longer necessary or relevant for the identified purposes for collection, or required to be retained by law or under contract. Such information shall be destroyed, erased or rendered anonymous.

Principle 6 - Accuracy

Personal information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

Personal information used by PTC shall be sufficiently accurate, complete and up-to-date to minimize the possibility that inaccurate information is being used to make a decision about an individual.

If staff and volunteers are aware of any inaccuracy or changes in their personal information that PTC holds about them, please contact the Program, Philanthropy, Communications Manager or Controller as required.

Staff handling personal information shall update personal information about participants, partners, donors, staff, volunteers, independent contractors and suppliers, as and when necessary.

Principle 7 - Safeguards

PTC shall protect personal information by security safeguards appropriate to the sensitivity of the information.

All staff and volunteers with access to information shall be required as a condition of employment or volunteer role, to respect the confidentiality of personal information.

The more sensitive personal information is, the more security is required. Speak with your Program, Philanthropy, Communications Manager or Controller for more information on safeguards appropriate to the sensitivity of personal information in your program or operational area.

Staff shall protect personal information in their control (regardless of format) against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security safeguards. Staff are required to use authorized PTC technology and accounts only which have been properly encrypted and not to use any personal accounts or devices to access personal information in their control.

Safeguards may include physical measures (such as locked doors, locked file cabinets), organizational measures (such as staff training, limited access, security clearances) and technological measures (such as passwords, anti-virus software for computer systems).

Personal information shared with a third party for processing shall be protected through contractual agreements with requirements for confidentiality and appropriate safeguards.

Principle 8 - Openness

PTC shall make readily available to individuals, information about its procedures and practices relating to the management of personal information.

Principle 9 - Individual Access

PTC shall upon request inform an individual of the existence, use and disclosure of their personal information and shall give the individual access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Staff and volunteers shall refer requests about personal information held about an individual to the Program, Philanthropy, Communications Manager and Controller.

Staff shall immediately inform their supervisor or Controller of a request for access by an individual to their personal information collected by PTC. The Controller shall respond to a written request for individual access by providing access to the individual's data, except in limited circumstances. See Exceptions to Access below.

In order to safeguard personal information, an individual may be required to provide sufficient identification information to permit PTC to account for the existence, use and disclosure of personal information, and authorize access to the individual's file.

The Controller shall respond to a written request for access in a reasonable time, and at minimal or no cost. Personal information shall be provided in a format that is understandable, along with any explanation needed to facilitate the individual's understanding.

The Controller shall provide the individual a reasonable opportunity to review and challenge the accuracy and completeness of personal information. A statement of disagreement will be attached to records where a requested amendment cannot be made.

Upon request, the Program, Philanthropy, Communications Manager and Controller shall provide an account of the use and disclosure of personal information. A list of organizations to which PTC may have disclosed personal information shall be provided.

Exceptions to access

PTC may not be able to provide an individual with access to some or all of their personal information in certain circumstances permitted by law. Some exceptions include if:

1. doing so would likely reveal personal information about a third party;
2. disclosure could reasonably be expected to threaten the life or security of another individual;
3. information was collected in relation to the investigation of a breach of an agreement, or a contravention of law, or as otherwise permitted by law.

If access to personal information cannot be provided, the Controller shall provide the individual with written reasons for denying access.

Principle 10 - Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated persons accountable for PTC compliance.

Staff and volunteers shall refer any inquiries or complaints about PTC's handling of personal information, to the Controller for response in a fair and timely manner.

Individuals may contact the Controller to discuss their question or concern about PTC information handling practices.

Individuals wishing to make a complaint about PTC information handling practices, will be asked to provide in writing to the Controller, the following information:

- Name, address, telephone number and email address where the individual prefers to be reached
- Nature of the complaint and relevant details
- If applicable, the name of the PTC staff with whom the individual has already discussed the issue.

PTC shall investigate all complaints. If a complaint is found to be justified, PTC shall take appropriate measures to resolve the complaint.

Ongoing Relevancy

PTC regularly reviews its policies and procedures to ensure we remain current with evolving public expectations and changing laws on an annual basis.