



# WYE MARSH PRIVACY POLICY

Wye Marsh is committed to protecting the privacy of personal information of current and potential donors, current and potential grantees, employees, volunteers and other individuals. Wye Marsh values the trust of those it deals with it, and of the public, and recognizes that maintaining this trust requires that Wye Marsh be transparent and accountable in how it treats personal information that is shared with it.

During the course of Wye Marsh activities the Wye Marsh, at times, gathers and uses personal information. Any individual from whom Wye Marsh collects such information may expect that this information will be carefully protected and that any use of or other dealing with this information is subject to consent. This privacy policy does not supersede the Wye Marsh Workplace Privacy Policy, but expands and enhances employee's commitment to the protection of the privacy of personal information of current and potential donors and/or grantees, volunteers and other individuals.

Wye Marsh privacy practices shall meet these expectations and shall be based upon the internationally recognized 10 Privacy Protection Principles or Fair Information Practices.

## **10 Privacy Protection Principles or Fair Information Practices**

This policy is intended to:

- Assist Directors, committee members, staff and other volunteers, contractors and all others who have or may gain access to the personal information resources of Wye Marsh, in understanding privacy protection practices, and their responsibilities when dealing with such personal information;
- Set out Wye Marsh's standards and procedures for the collection, use, disclosure and retention of all personal information under its control.

In \_\_\_\_\_, Wye Marsh adopted the "Ethical Fundraising and Financial Accountability Code", and the Donors' Bill of Right, which provides donors with privacy rights. The Privacy Program established by this Policy shall not replace, but shall supplement the privacy provisions found within the aforementioned Ethical Fundraising and Financial Accountability Code and Donors' Bill of Rights.

## **Interpretation:**

Personal information is any information that can be used to distinguish, identify or contact a specific individual. This information can include:

- An individual's opinions or beliefs, as well as facts about, or related to, the individual.
- Exceptions: business contact information and certain publicly available information, such as names, addresses and telephone numbers as published in telephone directories, are not considered personal information.
- Where an individual uses his or her home contact information as business contact information as well, we consider that the contact information provided is business contact information, and is not therefore subject to protection as personal information.

Ten Privacy Protection Principles are fair information practices that are recognized worldwide as standard rules for the collection, use and disclosure of personal information and are theoretically designed to meet the public's expectation for personal information privacy protection. In Canada these principles have been adopted within the Canadian Standards Association's Model Privacy Code and entrenched in Part I of federal privacy legislation – "Personal Information Protection Electronic Document Act" ("PIPEDA"). In addition to focusing on an organization's obligations with respect to the handling of personal information, the Principles also impose logistical and administrative obligations. These key privacy principles consist of the following:

**Principle 1 – Accountability**

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

**Principle 2 – Identifying Purposes**

The purpose for which personal information is collected shall be identified by the organization at or before the time the information is collected.

**Principle 3 – Consent**

The knowledge and informed consent of the individual are required for the collection, use, or disclosure of personal information, except where exempted by law.

**Principle 4 – Limiting Collection**

The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.

**Principle 5 – Limiting Use, Disclosure and Retention**

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the informed consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

**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.

**Principle 7 – Safeguards**

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

**Principle 8 – Openness**

An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

**Principle 9 – Individual Access**

Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

**Principle 10 – Challenging Compliance**

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.

**Contact Information**

Question, concerns or complaints relating to Wye Marsh's privacy policy on the treatment of personal information should be directed to:

Wye Marsh  
Suzanne McDonald  
Chief Privacy Officer  
P.O. Box 100, Highway 12  
Midland ON L4R 4K6  
Phone: (705) 526-7809  
Fax: (705) 526-3294  
Email: [smcdonald@wyemarsh.com](mailto:smcdonald@wyemarsh.com)