



Policy Number: 11
Organization: Ontario Land Trust Alliance (OLTA)
Title of Policy: Privacy Policy
Recommended by: BD&G Committee – August 2018
Approved by: OLTA Board of Governors – August 14, 2018
Next Review: August 2021

1. Purpose of Privacy Policy

OLTA is fully committed to protecting the privacy of personal information of its employees, volunteers, members, donors, funders, partners and many other stakeholders and supporters. We value the trust of those we deal with, and of the public, and we recognize that maintaining this trust requires us to be transparent and accountable in how we treat the personal information that you choose to share with us. During the course of our various projects and initiatives, OLTA may frequently gather and use personal information. Anyone from whom we collect such information should expect that it will be carefully protected and that any use of, or other dealing with, this information is subject to your consent that we will only use this information for the reasons that it was collected and not shared beyond this consent. OLTA privacy policy and operational practices are designed to achieve this purpose and your privacy.

2. Defining Personal Information

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, such as, business contact information and certain publicly available information, such as names, addresses and telephone numbers that are published in telephone directories, are not considered personal information. Information in the public domain is not subject to privacy legislation and as such this is not included in this policy. Where customers and clients use their home contact information as business contact information, OLTA considers the contact information that is provided is business contact - public information, and is therefore not subject to our policy protection as personal information.

We consider donor, funder and volunteer information always to be personal information, and do not disclose information about donors, funders or volunteers without their consent to permit a disclosure.

OLTA will observe defined practices and processes (listed in Items 3 – 10) when collecting, maintaining, securing or using personal information.

3. Consent for Information

An individual's consent is required regarding the collection and proposed use of personal information when the information is collected. Consent can be either expressed or implied and can be provided directly by the individual or by an authorized representative. Expressed consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from an individual's action or inaction to the request for use of personal information for a described purpose. An individual's expressed consent is required before any confidential personal information is released to outside parties.

4. Cookies and Analytics

Our OLTA website may use persistent or non-persistent cookies within visiting browsers to enable the functions of the website and for tracking performance. By way of example, cookies may be used in the following ways:

- Preserving or expiring visitor sessions on the site (e.g. preserving data between steps of a process or ending after a period of inactivity)
- Storing font size preferences on the site
- Enabling web analytic tools (such as Google Analytics, Clicktale, and iPerceptions – see below for practical reasons)

Cookies are used anonymously and without storing Personally Identifiable Information (PII). Visitors that wish to opt-out of cookies should review the help documentation in their browser software to decline or partially decline cookies. Declining cookies may impact on website performance.

OLTA may also use Google Analytics or like programs to track performance. Google Analytics can use cookies to track visitor sessions, multiple sessions, promotional links and referral sources to our sites. At no time is any personally identifiable information (PII) passed to Google Analytics. Google Analytics stores its data within the USA and is subject to their laws and regulations. We use this data to understand and improve our website performance and always to serve you better. Those wishing to opt out of Google Analytics data collection may use the Google Analytics Opt-Out Browser to accomplish this.

5. Limited Collection of Information

The collection of personal information is limited to that which is relevant and necessary for our defined programs and fundraising efforts. OLTA will not make unwarranted or intrusive inquiries into a donor or prospect's gift history or personal life. All data collected is attributed to defined use.

6. Limited Use, Disclosure and Retention

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

7. Accuracy

Personal information shall be as complete, accurate and up-to-date as possible. Donors are encouraged to review, correct and update personal information from time to time, if they wish OLTA to have current data. For ongoing use in the same purpose, OLTA may ask for confirmation of accuracy.

8. Security

Personal information gathered by OLTA shall be kept in strict confidence. OLTA personnel (staff or volunteers) shall be authorized to access personal information based only on their need to have information for the reason(s) and purpose(s) for which it was obtained. Appropriate physical and electronic measures shall be used to ensure personal information is secure. Access to donor and volunteer records shall be limited to those who require such information to actually fulfill their job responsibilities. Special protection shall be given to all records pertaining to anonymous donors. Confidentiality of donor and volunteer records continue after relationships with the individual are completed.

9. Confidentiality

Donors and funders who request that their name and/or the amount of the gift not be publicly released shall remain anonymous.

10. Transparency

Upon request, individuals shall be given access to the personal information that the OLTA has in their client or donor records.

Further information on your privacy and your rights in regard to your personal information may be found on the website of the Privacy Commissioner of Canada at www.priv.gc.ca.