

POLICY: CONFIDENTIALITY POLICY
SECTION: II – General Policies – Human Resources

MOTION#/DATE: May 16, 2013

Effective Date

May 16, 2013

Policy Statement

The Toronto Public Library Foundation will ensure that the privacy of all donors, volunteers, business information and employees' personal information in the custody or control of the Toronto Public Library Foundation is protected in keeping with best practices and relevant legislation.

Background

The Foundation's mandate is to provide essential resources for the enhancement of Toronto Public Library and to allocate funds to priority needs not supported by municipal funding. It is essential that the Foundation maintains the trust and confidence of its donors, and encourages their continued support.

Because we deal with individuals and information about those individuals, it is essential that we protect the privacy of that information. Although the Personal Information Protection and Electronic Documents Act ("PIPEDA") does not apply to most Foundation activities, we always strive to embrace best practices, and are therefore following the principles of the CSA Model Code for the Protection of Personal Information upon which PIPEDA is based.

Additionally, the Foundation is guided by and undertakes to adhere to the standards set out in the Imagine Canada *Ethical Fundraising and Financial Accountability Code* in its treatment of donors and public representations, its fundraising practices and its financial practice and transparency.

The Toronto Public Library Foundation has also endorsed the Association of Fundraising Professionals *Donor Bill of Rights*, which affirms the right of donors to expect the Foundation to be guided by the values of accountability and integrity in its work. These values speak to the need for openness, and responsibility in all operations.

Scope

This policy applies to all information held by the Foundation, including general information relating to its operations, to personal information collected from donors, and to personal information relating to Foundation staff and volunteers.

Application

This policy applies to the Toronto Public Library Foundation donors, staff and volunteers.

All volunteers will be required to sign annually, a Confidentiality Agreement that confirms the volunteer's understanding of the Confidentiality Policy and confirms that s/he agrees to be bound by the policy while a volunteer with the Foundation.

All employees, including temporary, seasonal or part-time employees, will be required to sign a Confidentiality Agreement annually, that confirms the employee's understanding of the Confidentiality Policy and confirms that s/he agrees to be bound by the policy as an employee of the Foundation. A copy of the signed Confidentiality Agreement is kept in each employee's file.

An employee may be disciplined for any breach of the Confidentiality Policy, up to and including termination of employment.

The conditions of this policy remain in effect even after employees and volunteers are no longer associated with the Toronto Public Library Foundation.

Privacy Commitment

The Toronto Public Library Foundation upholds the highest standards of professionalism, and takes the matter of confidentiality and privacy very seriously. We recognize that information is precious, and that our donors, volunteers and employees trust us to treat that information appropriately; we are committed to protecting the confidentiality of this data.

Furthermore, the Foundation recognizes that donors' choices about how much information about their donation is made public and the ways in which the Foundation communicates with them are matters of personal choice. The Foundation therefore will make every reasonable effort to ensure that these personal preferences are met.

Privacy Principles

1. We are accountable for your personal information

We are responsible for all personal information in our possession and we keep your personal information and the business you do with us in strict confidence.

Information relating to donors, volunteers, stakeholders and the business of the Toronto Public Library Foundation will be held in confidence at all times and will not to be shared by any employee with any third party individual or organization, without the explicit consent of the donor, staff or volunteer whether verbal or written, other than to those persons who are authorized to receive such information. Further, employees will not share such information within the organization, except on a need-to-know basis.

When in doubt as to the confidentiality of certain information, no disclosure should occur without first establishing that such disclosure has been authorized by the appropriate Manager or the President.

Where we choose to have certain services, such as telemarketing or data processing, provided by third party providers, we select the service providers carefully. We take all reasonable precautions to ensure that the service provider protects your personal information. These service providers enter into confidentiality agreements and do not keep any personal information on their files.

2. We collect, use and disclose personal information only for certain purposes that we identify to you

The Toronto Public Library Foundation collects, uses and discloses personal information from our donors to identify and help them meet their philanthropic needs, process their donations, provide tax receipts, direct their gifts in the manner in which they choose, keep them informed about gift giving opportunities and Toronto Public Library or Foundation activities, recognize their philanthropic activities in the community, and comply with federal and provincial legal and regulatory guidelines and reporting requirements.

The Toronto Public Library Foundation collects, uses and discloses personal information from our board members and volunteers to keep them informed about our activities, assist them in performing their roles in the organization, and comply with federal and provincial guidelines and reporting requirements.

The Toronto Public Library Foundation collects, uses and discloses personal information from our employees to assist in administering employee benefit programs, accommodate disabled individuals in the workplace, assist employees with illnesses or injuries in returning to work, support their ongoing training and development, and comply with federal and provincial guidelines and reporting requirements.

3. We will obtain your consent

We collect, use or disclose your personal information with your permission. Your permission may be expressed orally, in writing or may be implied, and you may give it to us orally, electronically or in writing.

You may withdraw your permission to collect, use and disclose your personal information at any time, subject to legal and contractual restrictions and reasonable notice.

4. We keep your personal information accurate and up to date

We maintain appropriate procedures to ensure that personal information in our possession is accurate and up to date. You are entitled to seek a correction of your personal information if you believe that the information in our possession is not correct.

If you believe any of the information 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.

5. We do not sell your personal information

We do not sell your personal information.

6. We will limit how long we keep information

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.

When we destroy personal information, we will use safeguards to prevent unauthorized parties from gaining access to that information during the process.

7. We safeguard your personal information

We protect your information from unauthorized access or use through physical and electronic security safeguards and limit access to only authorized persons and only when necessary.

All of our board members, staff, volunteers and the other people working at the Foundation sign confidentiality agreements that require the safeguarding and proper use of your personal information.

Employee files are held in strict confidence. We will not disclose employee information to suppliers, stakeholders, or any other parties without the written consent of the employee unless required by law.

In our interest to maintain and enhance public confidence in the Library Foundation and its employees, we also provide for the disclosure of any wrongdoing with respect to the Foundation's operations, policies and procedures through our Whistleblower policy.

8. We will be open about our privacy practices

Toronto Public Library Foundation will make readily available to you specific information about our policies and practices relating to the management of personal information.

9. We allow you to access to your personal information

You may ask whether we hold any personal information about you and, upon written request and with reasonable notice, you can access your own personal information, challenge its completeness and accuracy and seek to have it amended.

You also have the right to know:

- how we collected your personal information
- how we are using it

10. You may register a complaint

You can also challenge our privacy policies and practices with Toronto Public Library Foundation's Privacy Officer who will investigate, respond to your complaint in writing, and may take appropriate action, including amending your information or changing our

privacy policies and procedures. The name and contact information for Foundation's Privacy Officer can be obtained by calling us at (416) 393-7123.

If our Privacy Officer does not resolve your complaint to your satisfaction, you can seek more information or file your complaint with either with the Information and Privacy Commissioner/Ontario or the Privacy Commissioner of Canada:

Information and Privacy Commissioner of Ontario
2 Bloor Street East, Suite 1400
Toronto ON M4W 1A8
info@ipc.on.ca

Office of the Privacy Commissioner of Canada
112 Kent Street
Place de Ville, Tower B, 3rd Floor
Ottawa ON K1A 1H3