

**Privacy policy**

May, 2024

**1. Purpose**

1.1 The purpose of this policy is to outline the process for collecting, storing and protecting donor information with the RTOERO Foundation.

**2. Statement**

2.1 The RTOERO Foundation is committed to protecting the privacy of personal information.

2.2 The RTOERO Foundation staff are authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained. We value the trust of those who deal with us, and we strive to maintain the accuracy, confidentiality and security of their personal information.

**3. Limiting collection**

The RTOERO Foundation will limit the amount and type of personal information collected to that which is necessary for identified purposes. Personal information will be collected by fair and lawful means. All personal information provided to the RTOERO Foundation is confidential. Information collected becomes the exclusive property of the RTOERO Foundation.

**4. Collecting information required for programs and services**

4.1 The RTOERO Foundation identifies the purposes for which personal information is being collected before or at the time it is collected.

4.2 The RTOERO Foundation collects, uses and discloses personal information only for purposes that a reasonable person would consider appropriate in light of the circumstances.

For example, we collect and use personal information for the following purposes:

- Provision of RTOERO Foundation programs, services and information
- Delivery of personalized programs and services
- Dissemination of information about our conferences, other events and activities
- Distribution of print and digital publications
- Accounting services and billing related to RTOERO Foundation operations
- Provision of member communication, service and administration
- Administration of expense claims
- Follow-up to individual correspondence and requests
- Internal and regulatory audit purposes
- Legal and regulatory compliance

**5. Protection of personal information**

5.1 The RTOERO Foundation takes all necessary precautions to ensure that personal information is safeguarded and used only for the purpose(s) for which it was provided, whether it is stored in electronic or paper format. In all cases, information is protected from unauthorized access and kept only as long as is reasonably required.

5.2 Methods of protection include physical measures (for example, locked filing cabinets and restricted access to offices), organization measures (for example, limiting access on a “need to know” basis),

technological measures (for example, the use of passwords and encryption) and contractual measures (for example, ensuring that any third parties that store records are contractually bound to adhere to the RTOERO privacy policy).

- Personal information is maintained on secured networks and is only accessible by a limited number of persons who have special access rights to such systems. Confidentiality agreements are signed at the time of employment.
- Electronic files are password protected and accessible only by authorized employees on a need-to-know basis.
- All sensitive information is encrypted via Secure Socket Layer (SSL) technology.
- The RTOERO Foundation does not use vulnerability scanning and/or scanning to PCI standards.
- An external PCI compliant payment gateway handles all CC transactions.
- Malware scanning is employed as a data security feature.
- The RTOERO Foundation implements a variety of security measures when a user enters, submits, or accesses their information to maintain the safety of personal information.
- All financial transactions are processed through a gateway provider. The RTOERO Foundation does not store or process personal financial information on its servers.

## **6. Privacy and cookies**

### **6.1 What are cookies**

Cookies are small data files that are placed on the user's computer or mobile device when the user visits a website. Cookies are widely used by website owners in order to make their websites work, or to work more efficiently, as well as to provide reporting information.

### **6.2 Why do we use cookies?**

The RTOERO Foundation uses cookies for several reasons. Some cookies are required for technical reasons in order for our Online Properties to operate, and we refer to these as "essential" or "strictly necessary" cookies. Other cookies enable us to track and target the interests of our Users to enhance the experience on our Online Properties. Third parties serve cookies through our Online Properties for advertising, analytics and other purposes.

### **6.3 How to refuse cookies?**

Because these cookies are strictly necessary to deliver the Online Properties, the user cannot refuse them, but can block or delete them by changing browser settings. This is the responsibility of the user and that user should reference the browser help documentation. Analytics and customization cookies: These cookies collect information that is used either in identifiable or aggregate form to help us understand how our Online Properties are being used, the effectiveness of our marketing campaigns, or to help us customize Online Properties for the user. The RTOERO Foundation's website uses cookies to:

- Understand and save users' preferences for future visits
- Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. Trusted third-party services may be used to track this information on the RTOERO Foundation's behalf.

Through browser settings, users can choose to receive an alert each time a cookie is being sent, or they can choose to turn off all cookies. Since each browser is unique, users are encouraged to view their browser's Help Menu to learn the correct way to modify cookies.

The RTOERO Foundation never combines information gathered from a cookie with personally identifiable information like name, telephone number, or e-mail address, without consent.

## **7. No third-party disclosure of personal information**

7.1 The RTOERO Foundation does not sell, trade, rent or otherwise transfer personal information to third-party organizations.

7.2 The RTOERO Foundation obtains consent before using or disclosing personal information for any purpose, except where the law provides an exemption. In exceptional circumstances, personal information may be shared with law enforcement agencies, in emergencies, where required by court order or search warrant or as required by legislation in all provinces and territories in Canada.

## **8. CASL**

8.1 Canada's Anti-Spam Legislation (CASL) establishes the rules and requirements for commercial email messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

8.2 The RTOERO Foundation conducts its business communication in compliance with CASL and is committed to the following:

- Include the business address in email messages
- Identify advertising message in some reasonable way
- Provide instructions for unsubscribing in every email
- Allow users to unsubscribe by using the link at the bottom of each email.
- Honour opt-out/unsubscribe requests immediately
- Refrain from use of false or misleading subjects or email addresses

8.3 It is important to note that RTOERO Foundation donors cannot unsubscribe from "transactional" emails (for example, tax receipts).

## **9. Access to individual's own personal information**

9.1 The RTOERO Foundation will provide information to individuals about its policies and procedures relating to the management of personal information. On written request, the RTOERO Foundation will inform an individual of the existence, use and disclosure of any personal information that the RTOERO Foundation holds and will provide the individual with access to that information. Individuals are entitled to challenge the accuracy and completeness of personal information that is held by the RTOERO Foundation and to request that it be amended, as appropriate.

## **10. Accuracy**

10.1 The RTOERO Foundation makes a good faith effort to ensure that personal information under its control is as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used. To assist in this regard, the RTOERO Foundation urges its donors to provide updates regarding such information and to inform the RTOERO Foundation of any errors affecting the personal information that is held by the RTOERO Foundation.

**11. Accountability**

11.1 The RTOERO Foundation is responsible for protecting the personal information under its control and has designated an individual to be accountable for compliance with these policies.

**12. Questions**

Any questions related to this policy can be directed to Mike Prentice, Executive Director for the RTOERO Foundation at [mprentice@rtoero.ca](mailto:mprentice@rtoero.ca) or 1-800-361-9888 ext. 285.

**13. Review**

This policy is to be reviewed and updated annually or as required.

**14. Approval**

Approved by the RTOERO Foundation Board of Directors on May 3, 2024.