

# Confidentiality Policy

Category	Governance
Number	1-05
Title	Confidentiality
Issued By	Board of Directors
Date Approved	October 19, 2017; May 27, 2021
Date Revised/Reaffirmed	March 2021
Date to be Reviewed	2024
Responsible Party	Executive Director

## 1. Overview and Purpose

The South Saskatchewan Community Foundation (the Foundation) is committed to protecting the privacy of the information of its Directors, employees, donors, and other stakeholders. The Foundation values the trust of those it deals with, and of the public, and recognizes that maintaining this trust requires transparency and accountability in how it treats the information that donors choose to share with the Foundation. During the course of the Foundation’s various projects and activities, the Foundation gathers and uses personal information. Anyone from whom the Foundation collects such information should expect that it will be carefully protected and that any use of or other dealing with this information is subject to consent.

## 2. Definition

**Personal Information:** Any information that can be used to distinguish, identify, or contact a specific individual. This information can include, but is not limited to, 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, email addresses, and telephone numbers as published in public directories are not considered personal information. Where an individual uses his or her home contact information as business contact information as well, we consider the contact information provided as business contact information.

## 3. Policy

The Foundation manages information in compliance with Canada’s *Personal Information Protection and Electronic Documents Act (PIPEDA)* and Saskatchewan’s *The Freedom of Information and Protection of Privacy Act (FIPPA)*, or such other legislation as may apply from time to time as required; which govern the collection, use, and disclosure of information.

Personal information gathered by the Foundation is kept in confidence. The Foundation’s personnel 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. Safeguards are in place to ensure that the information is not disclosed or

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shared more widely than is necessary to achieve the purpose for which it is gathered. The Foundation also takes measures to ensure the integrity of this information is maintained and to prevent it from being lost or destroyed. The Foundation collects, uses, and discloses personal information only for purposes that a reasonable person would consider appropriate in light of the circumstances. The Foundation routinely offers individuals they deal with the opportunity to choose not to have their information shared for the purposes beyond those for which it was explicitly collected. The Foundation uses password protocols and encryption software to protect personal and other information they receive when a product or service is requested and/or paid for online. The Foundation's software is routinely updated to maximize protection of such information. The Executive Director has been designated to respond to questions, concerns, or complaints relating to this policy.

There are specific confidentiality requirements for the Foundation's stakeholders and they are as follows:

1. Donors:
  - 1.1. Directors and staff are required at all times to respect the confidentiality of a donor's name, level of gift, and personal circumstances that might identify a donor, if asked to do so by the donor or by a motion of the Board.
  - 1.2. Donor requests for confidentiality and anonymity will be strictly respected.
  - 1.3. Access to donor information will be restricted to only those who need it for the function of their duties.
  - 1.4. Donor lists are not shared with any other fundraising organization.
  - 1.5. The Foundation does not use outside contract fundraisers.
2. Grant Recipients:
  - 2.1. The Foundation grant making process requires charities and agencies to provide detailed project and organizational information. This may often be sensitive and will be treated in confidence.
3. Contractors:
  - 3.1. The Foundation, as a necessity, will contract with professional and business corporations. Details of all such transactions will be treated with respect and discretion.
  - 3.2. Information relating to personnel, litigation, and property contracts and resulting transactions will be kept confidential.

The Foundation will make readily available specific information about their policies and practices relating to the management of personal information if requested. People may register a complaint relating to a privacy-related matter by contacting the Foundation's Executive Director. The Foundation will explain our procedure. The Foundation will investigate all complaints. If in the Board's opinion an objection is justified, the Foundation will take the appropriate steps to repair the situation including changing the Foundation's policies and practices if necessary. Personal information relating to volunteers, job applications, and employees are subject to similar protocols.

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## 4. Implementation and Monitoring

- This policy will be posted on the Foundation's website.
- Upon orientation, all Directors, volunteers and employees shall be advised of the requirement to comply with this Confidentiality policy and complete the Foundation's Confidentiality Agreement (Section 8 Human Resource Manual)
- All Directors, volunteers and employees will sign an annual attestation form.
- The Executive Director will report in accordance with the Board Policy Framework on adherence to this policy.

## 5. References

- Canada's *Personal Information Protection and Electronic Documents Act (PIPEDA)*.
- Saskatchewan's *The Freedom of Information and Protection of Privacy Act (FIPPA)*.
- South Saskatchewan Human Resource Manual