



Privacy and Confidentiality

1.0 PURPOSE

The Smiths Falls Community Food Bank (SFCFB) SFCFB is a charitable organization dedicated to helping people in our area that are living with food insecurity. SFCFB is committed to protecting the privacy and the personal information of its clients, donors, employees, and other stakeholders. SFCFB values the trust of those we deal with, and of the public, and recognizes that maintaining this trust requires that we be transparent and accountable in how we treat the personal information that you may choose to share with us.

2.0 POLICY

SFCFB is committed to the following 10 privacy principles under PIPEDA: Accountability, Identifying Purposes, Consent to use your personal information, Limiting Collection, Limiting Use, Disclosure and Retention, Accuracy, Safeguards, Openness, Individual Access and Challenging Compliance.

3.0 DEFINITIONS

For the purpose of this policy, the following terms are defined:

- 3.1 **Collection:** The act of gathering, acquiring, recording or obtaining personal information from any source, including third parties, by any means.
- 3.2 **Consent:** The act of voluntarily agreeing to the collection, use and disclosure of personal information for defined purposes. Consent can be either expressed or implied and can be provided directly by the individual or by someone authorized to provide consent on behalf of the individual. Express consent may be given orally, electronically or in writing, and does not require any inference on the part of the SFCFB. Implied consent may be reasonably inferred from the individual's action or inaction by the SFCFB.
- 3.3 **Customer:** Any person, donor, member, client, volunteer, supplier, vendor etc. who may provide personal information to the SFCFB.
- 3.4 **Disclosure:** The act of making personal information available to a third part.
- 3.5 **Personal information:** Any information about an identifiable individual and may include an individual's name, address, email, telephone number, age, financial information, etc. Personal information does not include most business contact



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information such as name, position, title, business address, or business telephone or fax number of an individual.

- 3.6 **Supervisor:** A person who has charge of a workplace or authority over an employee. Generally, this would include those with a position title such as Director, Manager, or Supervisor, as well as any other management type position, or those in a temporary supervisory position.
- 3.7 **Use:** The treatment, handling, and management of personal information, including the de-identification of personal information.
- 3.8 **Worker:** Refers to any person regarding whom the SFCFB pays wages or a salary, has control over their assigned work and has a right to control the details of their work. It also extends to the senior management level.

This includes, but it is not limited to:

- full-time employees
 - part-time employees
 - seasonal employees
 - contract employees
 - volunteer
- 3.9 **Privacy Policy:** for the purpose, “you” and “your” refers to any individual using the Services, whether by referral from a social agency or otherwise, and “us”, “we” and “our” refers to SFCFB.

4.0 PROCEDURE

- 4.1 SFCFB will post its privacy policy on the website and in a visible spot in our location.
- 4.2 The Executive Director monitors any legislative updates through a newsletter subscription from the Office of the Privacy Commissioner of Canada and by regularly reviewing information from Link2Feed and/or Food Banks Canada. The Data Protection and Privacy Policy Audit Checklist is completed annually. Revisions to the privacy policy will be made as needed and shared with relevant stakeholders, clearly outlining any changes made.
- 4.3 All workers of the SFCFB must secure all personal/business information of our clients, customers, donors, vendors, volunteers, suppliers, contractors as outlined below:



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- No information may be left visible to unauthorized personnel.
 - All information must be secured by worker when leaving their work area.
 - No unauthorized personnel may access our files or database.
 - Information given by a donor should only be kept if the donor is asked. EG. “May I keep this information and contact you to follow up”
- 4.4 Personal information will be retained as long as the file is active and for such periods of time as may be prescribed by applicable laws and regulations.
- 4.5 All inactive files or personal information no longer required are shredded prior to disposal to prevent inadvertent disclosure to unauthorized persons. Information contained in an inactive file will be retained for a period of seven (7) years, except in the case where an application/contract is rejected. Where an application/contract has been rejected, the file and all personal information contained in the file will be retained for a period of two (2) years.
- 4.6 A client or an individual can withdraw consent to the SFCFB’s use of personal information at any time prior to the application being approved, by making such request in writing.
- 4.7 A copy of this privacy statement must be provided to the customer upon request and in methods that are accessible to persons with disabilities.
- 4.8 Worker’s personal information will be kept secure and accessed by authorized personnel only. This information will be used as required for payroll purposes, benefit plans, WSIB, government reporting, our computing providers and its related companies.
- 4.9 Clients at the SFCFB will also be required to show at EACH visit:
- Identification for EACH member of the household,
 - Proof of address matching client to their residence
- 4.10 SFCFB collects personal information to operate effectively and to provide you with the best experience possible using our Services. Personal information may be collected directly, such as when you request a hamper by phone, on a walk-in basis, or on written request form.
- 4.11 The personal information we collect includes the following:
- Name and contact information for yourself and any other individuals in the household. Your first, middle and last name, address, postal code and phone number.



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- Demographic information. Information about your age, gender.
- Primary source of income.
- Referral information about any social agency you have been referred to or by whom you were referred to receive a hamper.
- Notes and comments. Information about any specific requests made by yourself or any agency worker regarding a hamper, any extraordinary circumstances warranting exceptions, or any untoward/threatening behavior shown.
- Additional information like level of education and food allergies. Information about the number of years you have lived in Canada.
- Personal identification may include but not limited to, OHIP Card, license, and passport. We temporarily collect these personal id's to verify your identity and the identities of those sharing your hamper so as to ensure that you receive the food hamper you requested.

5.0 REFERENCE

5.1 Supporting Documents

- Confidentiality Agreement
- Data Protection and Privacy Policy Audit Checklist

5.2 Cross Reference Policies

- Data Protection Policy
- Anti-Spam Policy
- Records of Informed Consent
- Collecting Stakeholder Input