

Policy Title	Privacy Policy
Approval Date	December 5, 2023
Approved by	Board of Directors
Next Renewal	December 5, 2026

Privacy Policy

1. PURPOSE

In the pursuit of generating research, developing policy and implementing programs to improve results for conservation in Canada, the Centre for Land Conservation (CLC or the Centre) may collect personal information from individuals and organizations. CLC values and respects the privacy of these individuals and organizations. CLC is committed to protecting the privacy of its employees, volunteers, donors, participants in its research or programs, and other individuals who share information with the Centre.

This document outlines the Centre's policy regarding the collection, use and protection of confidential and personal information.

2. POLICY APPLICATION

This policy applies to employees, contractors, board members and other volunteers.

3. DEFINITIONS

Personal Information

Personal information is any recorded information that can be used to distinguish, identify, or contact a specific individual. This information includes an individual's opinions or beliefs, as well as facts about, or related to, the individual and includes personally identifiable information.

Personally Identifiable Information (PII)

PII is any information that could potentially identify a specific individual. Any information that can be used to distinguish one person from another and can be used for de-anonymizing anonymous information is considered PII.

Public Domain Information (PDI)

PDI includes business contact information, and certain publicly available information, such as names, addresses and telephone numbers. Information as published in telephone directories is considered public information and therefore not subject to the same laws as personal information. Tax filings and charitable information as published by the Canada Revenue Agency and information published by organizations such as annual reports is also considered PDI.

The Centre/CLC

A reference to the Centre or CLC means all employees, contractors and volunteers of the Centre for Land Conservation.

Staff

Staff refers to any individual employed by or under contract with the Centre.

Participant

Participant means any individual or representative of an organization who takes part in CLC programs or research whether through interviews, surveys, webinars or other means.

Volunteer

Volunteer refers to any individual engaging with the business of the Centre on a voluntary basis. This includes but is not limited to board members and performance assurance program assessors.

Donors

Donors are individuals or organizations who are financially supporting the Centre in the form of donations, grants or other financial contributions.

Constituent

Constituent refers to email subscribers and CLC contacts.

4. INTERPRETATION OF THIS POLICY

4.1 Information in the public domain (PDI) is not subject to privacy legislation and as such is not considered personal information within the meaning of this policy.

4.2 Constituent home contact information used as business contact information will not be considered as personal information.

4.3 All constituent information is considered personal information.

5. TRANSPARENCY AND CONFIDENTIALITY

To ensure transparency and accountability, CLC cites in its publications information sources and credits individuals and organizations for information provided to CLC in the course of its research or during program implementation.

Program participants, research participants, donors and constituents who request that their name and/or the name of their organization not be publicly released shall remain anonymous.

6. INFORMATION COLLECTION

Examples of the types of information collected by CLC are included in the Annex to this document.

CLC may collect personal information through conducting research and implementation of its programs as well as through fund raising, social media engagement, surveying or other activities.

The collection of personal information will be limited to that which is relevant and necessary to the Centre's research and programs, as well as information received as a result of a donation.

7. LIMITED USE, DISCLOSURE AND RETENTION

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

7.1 Programs

Information submitted or collected throughout the course of CLC's programs, for example Performance Assurance, will only be maintained as long as necessary to complete the Program. Once information is no longer required for the Program, records containing personal/organizational information will be deleted or destroyed from CLC's records.

7.2 Research

All information collected during the CLC's research activities may be maintained for its internal records. Unless express permission is granted by an individual, any personal information collected that relates to that individual will be anonymized in published research products.

7.3 Donor Information

The Center will maintain donor information and ensure the anonymity of a donors when requested by the donor. The CLC will not publish or publicly share the name of its donors unless express written consent is received.

7.4 Constituent Information

Constituent information will be maintained in CLC's database until its removal is requested by the constituent.

8. PIPEDA

CLC operates in line with the requirements of Canada's Personal Information Protection and Electronic Documents Act (PIPEDA). Individuals/organizations have the right to access and correct or delete any outdated or inaccurate personal information that is held by the CLC. The Centre will honour any request an individual may make to have access to or review their personal information that CLC has obtained.

9. CONSENT

An individual's consent is required regarding the collection and proposed use of personal information at the time the information is collected. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express 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.

Subject to and in line with any legal or statutory requirements, the CLC will abide by the individual's preferences. If individuals have not notified the Centre regarding their preferences with respect to personal information shared with CLC, CLC will consider that it has received implied consent for the use of such information consistent with the purpose for which it was shared and will manage such

information in line with the requirements of this policy. Individuals may at any time withdraw or change their consent by contacting the CLC at the address listed below.

NOTE: An individual's or organization's consent must be given in writing or electronically before personal or confidential information is released to outside parties.

10. ACCURACY

Personal information shall be as complete, accurate, and up-to-date as possible.

Upon request, individuals shall be given access to their information held by CLC.

11. SECURITY SAFEGUARDS

Personal information gathered by the Centre shall be kept in confidence. CLC personnel are authorized to access personal or confidential information based only on their need to access the information for the reason(s) for which it was obtained.

Appropriate physical and electronic measures shall be used to ensure personal and confidential information is secure. Access to participant, donor and constituent records shall be limited to those who require such information to fulfil their job responsibilities. Special protection shall be given to all records pertaining to individuals and organizations that have requested anonymity. The confidentiality of such records shall continue after the relationship with the individual has ended.

12. RESPONSIBILITIES

Executive Director (ED)

The ED is responsible for:

- Ensuring that employees, contractors, board members and other volunteers are aware of and abide by the requirements of this policy.
- Keeping up to date on personal information policy or legislation.

Programs Officer

The Programs Officer is responsible for:

- Maintaining and updating the website and social media accounts.
- Ensuring website data/analytic tracking and other privacy policies are up to date and legally sound.

Employees and Contractors

All staff of the Centre are responsible for:

- Ensuring that personal information is protected and remains confidential.
- Using personal information only for the reason(s) it was collected.
- Following the federal and provincial legislative requirements regarding personal information.
- Understanding and practicing this privacy policy and the Centre's Code of Conduct and Conflict of Interest policy and procedures.

Volunteers

All volunteers of the Centre are responsible for:

- Using private information only for the reason(s) it was collected.
- Following the federal and provincial legislative requirements regarding personal information.
- Understanding and practicing this privacy policy and the Centre's Code of Conduct and Conflict of Interest policy and procedures.

13. REFERENCES

See also:

CLC's Code of Conduct and Conflict of Interest Policy

14. Contact Information

Executive Director

info@centreforlandconservation.org

Centre for Land Conservation

1000 Innovation Drive, 5th Floor

Ottawa, Ontario K2K 3E7

Charitable Registration: 854475969RR0001

Annex: Types of Information Collected by CLC

Programs

The CLC collects information through implementation of its programs, primarily the Performance Assurance Program, through form submission, interview, email and mail. Information submitted or collected throughout the course of CLC's programs may include but is not limited to:

- Organization information (name, registration number, address, email)
- Information related to Board of Directors and Governance (bylaws, meeting minutes, policies and other documents)
- Program documents (stewardship, property securement or other policies, management plans)
- Financial information (budget and related information)
- Internal operational policies, plans and human resources information

Research

The information collected via research at the CLC varies based on the nature of the project. Information is generally collected via survey or webinar/workshop participation, direct requests or interviews. Some examples of information that may be collected include but is not limited to:

- Financial information related to a participant's affiliated organization
- Strategic organizational information
- Personal opinions and reflections
- Information on past or pending legal action by or against the participant's affiliated organization

Donor Information

The information collected from donors or other funders to the CLC includes any information necessary for the processing of financial transactions and maintaining relationships with the donors and funders. Some examples of information that may be collected include but is not limited to:

- Name
- Title
- Email
- Address
- Phone number

Constituent Information

Constituent information includes information collected via email sign ups or other interactions with the Centre. Some examples of information that may be collected include but is not limited to:

- Name
- Title
- Email
- Address
- Phone number