

# Privacy Policy

The Souris Glenwood Foundation (the "Foundation") collects information through a variety of means including through web, mail, telephone and in-person correspondence. The Foundation operates a website at: <https://www.sgfoundation.ca> (the "Website"). The Foundation is committed to protecting the privacy of the personal information it collects. The Foundation 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 information that is shared with us. This Privacy Policy explains how the Foundation collects, uses, and discloses the personal information you may provide. This Policy applies to The Foundation Board of Directors, as well as all employees and volunteers of The Foundation. This includes activity conducted while using the Website and any other websites or microsites operated by the Foundation. By providing the Foundation with information through its websites, mail, telephone, or in-person, you consent to the collection, use and disclosure of your personal information by the Foundation in accordance with this Privacy Policy.

## 1. Definitions.

For the purposes of this Privacy Policy, the following words and variations thereof have the following meanings:

**"collection"** means the act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

**"consent"** means knowledge and voluntary agreement for the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the user 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 a user's action or inaction.

**"disclosure"** means making personal information available to a third party.

**"electronic communications"** means the electronic publications, newsletter, blog, and announcements provided by the Foundation to users.

**"employee"** means an employee of the Foundation, and for the purpose of this Privacy Policy only, includes independent and other contractors performing services within the Foundation.

**"Foundation account"** means an online account for which a user must register by creating a username and password, including a donor account and a grant application account.

**"personal information"** means information about an identifiable individual but not aggregated information that cannot be associated with a specific individual. For a registered user of a Foundation account, such information may include (but is not limited to) donation and grant information, billing information, account information, donation and grant records, and any recorded complaints.

**"third party"** means an individual other than the user, or the user's agent, or an organization outside the Foundation.

**"use"** means the treatment, handling, and management of personal information by and within the Foundation.

**"user"** means an individual who uses the Website or Websites, including anyone who accesses or visits the Website or Websites.

**"Websites"** means collectively <https://www.sgfoundation.ca> as well as any tools, apps, forums, event registration pages, social media pages, contest entries, blogs, purchases and/or donations or grants.

## **2. Collection**

During interaction with The Souris Glenwood Foundation including in-person, and through physical and virtual interaction, you may be asked to voluntarily provide the following personal information, if the personal information is reasonably required to provide the services accessed, used or requested by you:

- (a) information that you provide when you become a registered user of a Foundation account or otherwise complete forms on the Websites, such as your name, email and postal address, and telephone number;
- (b) your log-in and password details in connection with any account that you set up with the Foundation, including your username;
- (c) information that you provide to the Foundation in order to give donations, including credit card information;
- (d) information that you provide to the Foundation in order to apply for and receive a grant, including a list of the board of directors and officers of your organization;
- (e) your correspondence with Foundation employees, including any questions, concerns or comments you may have about the Websites or problems that you report;
- (f) comments that you may post to the Websites; and
- (g) details of your transactions and requests made.

### **3. Purpose of Collection and Use of Personal Information**

The Foundation collects your personal information and will use your personal information as is reasonably required for the following purposes:

- (a)** if you are a registered user of a Foundation account, to establish and maintain your Foundation account and to provide the ongoing services that you request;
- (b)** to respond to questions, comments, requests or complaints that you submit to the Foundation;
- (c)** to process your donations;
- (d)** to provide income tax receipts, where applicable;
- (e)** to process grant applications;
- (f)** to invest and administer Foundation funds;
- (g)** to process your registration for certain events;
- (h)** to provide you with the electronic communications you request;
- (i)** to grant you access to post information to the Foundation's blog;
- (j)** to edit and moderate comments posted to the Foundation's blog and to otherwise administer the Foundation's blog;
- (k)** to track communications with you;
- (l)** to improve your experience of the Websites, including to customize website settings;
- (m)** to analyze use of the Websites and to improve the Websites;
- (n)** to verify the identities and account information of registered users who are giving or receiving monies through the Foundation;
- (o)** where donors have not requested anonymity, to report to the public the names of all the Foundation's endowment funds and the names of donors;
- (p)** to fulfill a purpose that we disclose to you when we request your personal information; and
- (q)** to meet legal and regulatory requirements.

Personal information gathered by the Foundation is kept in confidence. Foundation employees are authorized to access personal information based only on their need to deal with the information for the reason for which it was obtained. Personal information will only be collected and used by authorized employees in a manner consistent with the activities of the Foundation. We do not rent, sell or otherwise disclose any of the personal information you provide to the Foundation, other than for those purposes Privacy Policy.

We do not share or otherwise disclose any of the personal information you provide to the Foundation, other than as expressly set out in this Privacy Policy.

#### **4. Disclosure**

The Foundation may disclose your personal information to:

(a) its employees, agents and service providers for the purpose of enabling these parties to perform a business, professional, charitable or technical support function for the Foundation;

(b) a person who, in the reasonable judgment of the Foundation, is seeking the information as your agent;

(c) the public, where the personal information is about a donor who has not requested anonymity and the personal information is being disclosed to report the names of all the Foundation's endowment funds and donors; and

(d) a third party or parties or government institution, where you consent to such disclosure or the disclosure is required by law.

If you voluntarily submit, transmit, upload, provide, post or otherwise make available any information, photographs or other content (the "User Content") to the Websites, certain of your personal information may be automatically included in the posting, transmission, upload or submission, including without limitation, your user name and email address, and this User Content may be collected and used by others. The Foundation has no control over and is not liable for the collection, use or disclosure of any posted, submitted, transmitted, uploaded, provided or otherwise make available User Content or your included personal information by users of the Websites. You are responsible for ensuring the protection of any of your personal information that you submit, post, transmit, upload, provide or otherwise make available on any of the Websites. We recommend that you do not include your home address, job title, telephone number or other more sensitive personal information in any User Content, unless you are entirely satisfied that such information should be made public.

#### **5. Safeguarding Your Personal Information**

The Foundation is committed to safeguarding your personal information. The Foundation will only retain personal information for as long as it is required to fulfill the identified purposes for which it was collected. The Foundation uses appropriate security measures to protect personal information against risks such as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction regardless of the format in which it is held. The methods of protection and safeguards used by the

Foundation include, but are not limited to, locked filing cabinets, need-to-know access and technological measures, including the use of passwords, encryption and firewalls. While the Foundation cannot guarantee that risks such as loss, theft, unauthorized access or disclosure of personal

information will not occur, the Foundation will make every effort to prevent such unfortunate occurrences.

Third parties are required to safeguard information entrusted to them in a manner consistent with the policies of The Foundation and are required to sign a confidentiality agreement as part of all contracts. Examples of third parties include mailing services and data analysis providers.

The Foundation takes care in disposing of or destroying personal information to prevent unauthorized parties from gaining access to the personal information. The Foundation also ensures that its employees with access to personal information are made aware of the importance of maintaining the confidentiality of personal information.

## **6. Accuracy**

The Foundation is committed to keeping your personal information as complete, up-to-date, and accurate as is necessary for the purposes for which it is to be used. The Foundation will promptly correct or complete any personal information found to be inaccurate or incomplete. Where appropriate, the Foundation will transmit amended information to third parties having access to the personal information in question. Upon request, the Foundation will provide you with a reasonable opportunity to review the personal information in your file to review its accuracy. Such personal information will be provided within a reasonable time of the request and at a minimal or no cost to you. Also upon request, the Foundation will provide an account of the use and disclosure of your personal information and, where reasonably possible, will state the source of the information. In providing an account of disclosure, the Foundation will provide a list of organizations to which it may have disclosed personal information about you when it is not possible to provide an actual list.

## **7. Complaints**

The Foundation will promptly investigate all complaints concerning our compliance with the Privacy Policy and our dealings with your personal information. If a complaint is found to be justified, the Foundation will take appropriate measures to resolve the complaint, including, if necessary, amending the Foundation's policies and procedures. You will be informed of the outcome of the investigation regarding your complaint.

## **8. Withdrawing Consent**

You may withdraw your consent to the collection, use or disclosure of your personal information by the Foundation at any time, subject to legal or contractual restrictions and reasonable notice. In certain circumstances, your withdrawal of consent may result in the inability of the Foundation to continue

providing services to you. Please contact the Foundation for more information regarding the implications of withdrawing consent.

## 9. **Non-Identifying Information**

The Websites may automatically collect certain non-identifying information regarding users of the Websites, such as the IP address of your computer, the IP address of your Internet service provider, the date and time you access the Websites, the Internet address of the website from which you linked directly to the Websites, the operating system you are using, the sections of the Websites you visit, the pages of the Websites read and images viewed, and the materials you post, submit, transmit, upload or produce to or download from the Websites. This non-identifying information is used for the operation of our web services, to maintain quality of the services, and to provide general statistics regarding use of our web services. We make no attempt to link this information with the identity of individuals visiting our Website. Your non-identifying information may be permanently archived for future use. The Website use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies" which are text files placed on your computer to help the Websites analyze how users use the Websites. Cookies enhance the convenience and use of a website. The information generated by the cookie about your use of the Websites (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Websites, compiling reports on website activity for the Websites 'operators and providing other services relating to website activity and Internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that doing so may affect your use of the Websites and your ability to access certain features of the Websites. By using the Websites, you consent to the processing of data about you by Google in the manner and for the purposes set out above. Google currently offers a free Google Analytics opt-out tool for Internet Explorer 7-10, Google Chrome, Mozilla Firefox, Apple Safari and Opera, which is available at <http://tools.google.com/dlpage/gaoptout>.

## 10. **Inquiries**

To submit an inquiry, complaint, request a review of your personal information, correct or update your personal information, withdraw your consent or request more information or additional copies of the Privacy Policy contact:

Souris Glenwood Foundation  
Box 518 Souris, Manitoba R0K 2C0

Email [info@sgfoundation.ca](mailto:info@sgfoundation.ca) by including "Privacy" in your subject line  
Phone No.: 204.483.2605

## **11. Other Websites**

The Websites may contain links to other websites or Internet resources. When you click on one of those links you are contacting another website or Internet resource that may collect information about you voluntarily or through cookies or other technologies. The Foundation has no responsibility or liability for or control over those other websites or Internet resources or their collection, use and disclosure of your personal information.

## **12. Privacy Policy Changes**

The Foundation will review this Privacy Policy on a regular basis to ensure that it is relevant and remains current with changing technologies and laws and the evolving needs of the Foundation and its users.

## **13. Privacy Breach Notification**

A privacy breach takes place when personal information is stolen, lost or inadvertently disclosed to people who are not entitled to receive it. In the event of a privacy breach, The Foundation will act as soon as reasonably possible to:

- 1.** Contain the breach in order to ensure that the breach of personal information does not escape any further than what has already occurred; and
- 2.** Notify all persons or entities who should be advised of the breach; and
- 3.** Evaluate what personal information was breached, how the breach occurred and the consequences stemming from the breach; and determine what processes should be changed or instituted to ensure such a breach is prevented from happening again.