



## Privacy Policy

Last modified: July 13, 2024

Community Foundations of Canada (“CFC”) is committed to protecting your privacy. This Privacy Policy outlines the principles and guidelines that govern the collection, use, and disclosure of personal information by CFC. It is designed to ensure transparency, accountability, and compliance with applicable privacy laws and regulations. This CFC Privacy Policy applies to the collection, use and disclosure by CFC of information about identifiable individuals (“Personal Information”) collected by CFC during its operations and provision of services to members of CFC and others, and through our websites. By adhering to these practices, we aim to foster trust and confidence among our stakeholders and uphold our commitment to protecting the privacy and data of community.

### Collection of Your Personal Information

CFC may collect Personal Information when you provide it to us, such as your e-mail address, name, home address or telephone number. CFC may also collect demographic information, such as your postal code, age, gender, preferences and interests.

You can choose voluntarily to create a public profile on some of our websites, containing information about yourself, such as your hobbies, expertise, associations and interests. Any information you choose to enter in your public profile will be visible to other users of our websites and when you interact with other users (for example through blogs, forums, and chat rooms), a link to your public profile may be displayed. Please keep in mind, when considering whether to provide Personal Information through a CFC website, that any information you provide may be collected and used by others.

CFC may collect information about your visit to our websites, including the pages you view, the links you click and other actions taken within our websites. We also collect certain standard information that your browser sends to every website you visit, such as your IP address, browser type and language, access times and referring website addresses.

Certain CFC website services may be co-branded and offered in conjunction with other companies. If you register for or use such services, both CFC and the other companies may receive information collected in conjunction with the co-branded services.



## What Personal Information Do We Collect?

- Professional and/or personal contact information, such as first and last names, address(es), email address(es), date of birth, and telephone number(s);
- Biographical information, such as job title, employer, professional and/or personal background;
- Marketing information and communication preferences, as well as related information, such as dietary preferences, comments, and survey responses;
- Information relating to participation in CFC's events, billing and financial information, such as billing address, bank account, or payment information;
- Service-related information, such as details of services we have provided or rendered to you;
- Information about your professional background, your networks, your social involvement, your professional affiliations, and family ties;
- Recruitment information, such as curriculum vitae and resumes, education and professional education and work history, details of professional affiliations, and other information relevant to potential recruitment by CFC;
- Website usage and other technical information, such as details regarding visits to our websites, your interaction with our advertising and online content, or information collected through cookies and other tracking technologies;
- Information provided to us by or on behalf of our partners, network members or other stakeholders, which may, where relevant, include special categories of Personal Information (such as racial or ethnic origin, political opinions, religious or philosophical beliefs, etc.);
- Information such as your donation and community investment policy, your contributions, the recipient organization, and what, if anything, they are dedicated to, the recognition received, the decision-making process, and the people involved in the organization and this process;
- Any other Personal Information provided. Please note that if you provide us with Personal Information about other people, such as your customers, administrators, managers, directors, officers, shareholders, or beneficial owners, you must ensure that you have duly notified them that you are providing us with their information and that you have obtained their consent to such disclosure, and;
- Where applicable, evidence of consent given to us (date, time, means), in circumstances in which such consent is necessary for the processing of Personal Information.

We do not knowingly collect information from children or others under the age of 14. If you are a minor under the age of 14, please do not provide us with any Personal Information without the express consent of a parent or guardian. If you are a parent or guardian and you are aware that



your children have provided us with Personal Information, please contact us. If we learn that we have collected Personal Information from minor children without verification of parental consent, we will take steps to delete this information from our servers.

## **Where do we Collect Your Personal Information?**

We collect Personal Information from you through our interactions with you, as follows:

- When you register for events, training courses, and newsletters;
- When you apply for grants, participate in review or review committees;
- When you apply for job postings and when you join our staff, Board of Directors, or committees;
- When you participate in CFC surveys and consultations;
- When you provide services to us, and;
- During correspondence by mail, email, or telephone.

We also collect publicly available information on public platforms, including our website

## **How do we Use Your Personal Information?**

CFC uses your Personal Information to deliver our services to our members and others, including those who use our websites.

Our website services may include the display of customized content and advertising based upon the information CFC has collected. CFC also uses your Personal Information to inform you of other products or services available from CFC and may use your Personal Information to send you surveys regarding our current services or new services that CFC is considering offering. We may use Personal Information in any of the ways listed below, with your consent or, where applicable, under another legal basis. In each case, we indicate the purposes for which we use your Personal Information.

- Issuing tax receipts;
- To provide our services and in conducting our business, to administer and perform our services, including fulfilling our obligations under any agreement between you and us;
- To facilitate the use of our websites and to ensure that content is relevant and to ensure that content on our websites is presented in the most effective manner for you and your device;
- For marketing and business development purposes - to provide details of new services, information on developments in our organization and industry, and invitations to events where an individual has opted to receive such information;



- For research and development purposes (including security) - to carry out analyses to better understand our customers' service and marketing requirements and to better understand our organization and develop our services and offerings;
- For recruitment purposes - to enable us to process job applications and to assess whether a person meets the requirements for the position for which they are applying.
- To meet our legal, regulatory, or risk management obligations;
- To prevent fraud and/or conduct other background checks that may be required at any time under applicable law or regulation and/or best practices (if false or inaccurate information is provided or fraud is found or suspected, information may be forwarded to fraud prevention organizations and may be recorded by us or such organizations.) When processing special categories of Personal Information, we may also rely on important public interests (crime prevention or detection) or legally founded claims;
- To enforce our rights, to meet our legal or regulatory reporting obligations, or to protect the rights of third parties;
- To ensure we get paid - to collect payments owed to us and, where appropriate, to enforce such collections through debt collection agencies or other legal means (including legal proceedings), and;
- In order to reorganize or change our organization - if we undertake a reorganization (for example, by merging, consolidating, or divesting part of our organization's mission), we may need to transfer some or all Personal Information to an applicable third party (or its advisors) as part of any due diligence process or transfer to such reorganized entity or third party for the same purposes as set out in this Privacy Policy or for the purposes of analyzing any proposed reorganization. In such a situation, we will take all possible steps to ensure the protection and security of Personal Information.

## **With Whom Do We Share Your Personal Information?**

CFC is a non-profit organization duly incorporated and recognized as a charitable organization. Consequently, the Personal Information we collect may be transmitted to and processed by any entity in the CFC network.

CFC does not sell, rent or lease its membership or user lists to third parties. CFC may, from time to time, contact you on behalf of a third party about a particular offering or materials that we believe may be of interest to you. In those cases, your Personal Information (e-mail, name, address, telephone number) is not transferred to the third party.

We occasionally hire other companies ("Service Providers") to provide limited services on our behalf, such as handling the processing and delivery of mailings, internet service providers sending our messages or hosting our websites, providing member and user support, processing



payment transactions, or performing statistical analyses of our services, marketing and membership support, among other CFC activities (collectively, the “Services”).

We will only permit Service Providers access to Personal Information to the extent that it is required to deliver the Services and will require them, through contractual means, to maintain the confidentiality of your information and respect your privacy. Specifically, we will require Service Providers to establish and maintain appropriate safeguards for Personal Information and prohibit them from using Personal Information we transfer to them, except for the purpose of providing the Services, and from disclosing such Personal Information.

CFC may access and/or disclose your Personal Information if required or permitted to do so by law. CFC may also access and/or disclose your Personal Information under the following circumstances: (a) to comply with a legal requirement including but not limited to one imposed by a warrant, subpoena, court order or like instrument served on CFC; (b) where CFC has reasonable grounds to believe that such access or disclosure is necessary to prevent or investigate any breach of an agreement or contravention of a law; or (c) in urgent circumstances to protect the life, health or security of any person.

CFC may also disclose your Personal Information to its successors or any assignee of CFC. Any use or disclosure of your Personal Information within CFC will remain subject to the limitations of this Privacy Policy.

We may also share Personal Information with certain third parties, including the following:

- Third-party service providers and/or partners, including those who provide us with database analysis, website, application development, hosting, maintenance, and other services;
- These third parties may access or process Personal Information in connection with the services they provide to us. We limit the information we provide to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with these service providers require them to maintain the confidentiality of such information;
- Government authorities and law enforcement agencies where required by applicable law. For greater certainty, we may disclose personal and other information if we are required to do so by tax or other laws, or if we believe in good faith that such disclosure is necessary to comply with applicable laws, in response to a court order or government subpoena or search warrant, or otherwise to cooperate with such government authorities and law enforcement agencies;
- The purchaser, successor, or assignee in connection with any merger, acquisition, debt financing, asset sale or similar transaction, as well as in the event of insolvency,



bankruptcy, or receivership involving the transfer of Personal Information as a business asset to one or more third parties, and;

- We will only use Personal Information for the primary purpose and the applicable, legitimate purpose for which it was collected, or for purposes consistent with that primary purpose.

CFC uses the services of third-party sites, such as Facebook, LinkedIn, and Google, to promote its content and offers.

When you visit our website, these third parties may use cookies, web beacons, or similar technologies to collect or receive information about your browsing on the website and elsewhere on the Internet. These technologies enable us to deliver relevant advertising targeted to your interests. You can consult cookies and delete them if you wish. Therefore, you have full control. We advise you to refer to your browser settings to make the appropriate changes. If you would like third-party sites to store cookies in order to offer you targeted advertising, you can activate this option. For more information, please consult our Cookie Policy (reference below).

## **For How Long do we Retain Your Personal Information?**

We will retain Personal Information only as long as is necessary for the purposes set out in this Privacy Policy and to comply with our legal, regulatory, and contractual obligations.

To learn more about how long we keep Personal Information, please consult our Data Retention Policy ([link](#)) or contact us as indicated in the “How to Communicate with CFC” section below.

## **How do we Protect Your Personal Information?**

CFC is committed to protecting the security of your Personal Information. We follow generally accepted industry standards to protect the information submitted to us, both at the time of transmission and once we have received it. We maintain appropriate physical, technical, and administrative safeguards to protect Personal Information against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure, or access, misuse, or other unlawful forms of processing of Personal Information in our possession.

We have taken steps to ensure that only employees who have access to your Personal Information are those who have a need to know or whose duties reasonably require them to know it.

However, no method of transmission over the Internet, nor any means of electronic storage, is 100% secure. We therefore cannot ensure or warrant the security of any information you transmit or provide to us, and you do so at your own risk. Nor can we guarantee that such information will



not be accessed, obtained, disclosed, modified, or destroyed as a result of a breach of our physical, technical, or administrative safeguards.

If you have reason to believe that your Personal Information has been compromised, please contact us as indicated in the “How to Communicate with CFC” section below.

In the event of a privacy incident involving your Personal Information, we will notify you as soon as possible after we become aware of the incident. We will take reasonable steps to minimize the risk of harm and to prevent similar incidents in the future.

Some of the Service Providers used by CFC may be located outside of Canada or have computer servers located outside Canada. In such an event, your Personal Information may be seen by foreign governments or their agencies.

## **Control of Your Personal Information**

In certain instances, CFC offers its members and others an opportunity to limit the collection, use and sharing of their Personal Information. For example, you may choose not to receive marketing or promotional material from CFC, on its own behalf or on behalf of third parties, and may stop the delivery of future promotional e-mails and newsletters. You may contact CFC at any time to unsubscribe from future marketing or promotional materials. Our contact details are set out below.

When providing Personal Information to CFC or responding to a communication from CFC, look for a button, box, or a question asking whether you want to provide or share your Personal Information, or an unsubscribe option.

If you withdraw your consent to receipt of materials or promotions, or unsubscribe from receiving electronic messages from CFC, you may choose to do so, but there may be an impact on which services CFC is able to provide to you.

## **Cookie Policy**

By using any of our websites, you consent to the use of cookies in accordance with this cookie policy [[link to cookie policy](#)]. You will have seen an invitation to manage cookies on your first visit to this website. Although it is not usually displayed on subsequent visits, you may withdraw consent at any time by following the instructions in our cookie policy.



## Individual Data Concerns and Procedures

CFC commits to handling personal information in accordance with the data protection laws and guidelines in place in the jurisdictions we primarily serve. We are dedicated to maintaining transparency and ensuring you have control over your Personal Information. We have established the following procedures to address your concerns and requests:

1. **Requesting Access:** If you wish to know what Personal Information we hold about you, you can request a summary of your data and details about how it is used. Subject to applicable law and, where applicable, the payment of a monetary sum, the individual may receive a copy of the Personal Information we hold and certain other information concerning them.
2. **Ensuring Accuracy:** CFC takes reasonable steps to ensure that personal information we hold in our possession is accurate, complete, not misleading, and up-to-date
3. **Rectifying Incorrect or Incomplete Data:** Individuals may request rectification of any incomplete or inaccurate personal information held by CFC
4. **De-indexing Data Upon Request:** Individuals may request that we stop disseminating their personal information or de-index any hyperlink attached to their name giving access to information if such dissemination causes them harm or contravenes the law or a court order. There may be circumstances where CFC is legally required to retain certain information. This could include compliance with Canadian laws, regulatory requirements, or other government mandates that necessitate the retention of specific data.
5. **Anonymizing Data:** Individuals may request that, instead of destroying personal information, CFC anonymize personal information in order to use it, but only for serious and legitimate purposes, such as keeping information required for possible tax inspection purposes
6. **Understanding Automated Decisions:** CFC commits to informing you if any decisions impacting you are made solely through automated processing of your Personal Information.
7. **Transparency in Profiling:** CFC commits to informing you if we utilize identification, location, or profiling technologies, and of the means offered to activate these functions.

If you have any concerns about how we handle your Personal Information or if you believe there has been a breach of privacy, we encourage you to contact us. We are here to listen and take necessary actions to resolve any issues. For any requests or further information, please reach out to our Privacy Officer using the contact details provided in the “How to Communicate with CFC” section below. We are committed to addressing your inquiries efficiently and ensuring your personal information is handled with care.



COMMUNITY  
FOUNDATIONS  
OF CANADA

FONDATIONS  
COMMUNAUTAIRES  
DU CANADA

## **Correction or Updating Personal Information**

If a user's Personal Information changes (such as postal code or email address), or if a user no longer desires our services, we will endeavour to provide a way to correct, update or remove that user's Personal Information provided to us.

## **Changes to this Policy**

CFC encourages you to periodically review this Privacy Policy. CFC will occasionally update or change this Privacy Policy. When CFC makes changes to this Policy, you will see the word "updated" next to the Privacy Policy link on our website posting. The date that this Policy was last updated will appear at the top of the Policy.

## **How to Communicate with CFC**

If you have any questions, comments, or complaints about this Privacy Policy or your Personal Information, or if you wish to make a request, file a complaint, or obtain information about our policies and practices regarding our service providers outside Canada, please contact our Privacy Officer:

Attn: Geneviève Vallerand, Privacy Compliance Officer  
Community Foundations of Canada  
Suite 600, 123 Slater  
Ottawa, ON  
K1P 5H2

E: [privacy@communityfoundations.ca](mailto:privacy@communityfoundations.ca)

P: 1-613-236-2664

F: 1-613-236-1621



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