



Samuel W. Stedman Foundation

Privacy Policy Protection of Personal Information

Policy Statement

The Samuel W. Stedman Foundation, hereafter The Foundation, will strive to ensure that the personal information it manages in the conduct of its business is protected.

Purpose

To protect personal information, and assure individuals of this protection, this policy establishes procedures enabling The Foundation to comply with the federal *Personal Information Protection and Electronic Documents Act* (PIPEDA).

Scope (to whom does this apply) – Bursary Applications

This policy addresses the protection of personal information of current and former Bursary Applicants, School Guidance Staff/Teacher and parents/guardians whose personal information is collected.

Scope (to whom does this apply) – Registered Charities requesting funds

This policy addresses the protection of personal information provided by those charitable organizations who apply for funding. The Foundation retains the right to make public a list of names of charitable organizations to which it has granted funds.

Policy Details, Interpretation & Administration

The Foundation collects and uses Personal Information (such as name, address, telephone number, academic transcripts, household income, recommendations) for the following purposes:

- for the purpose of assisting the Foundation Bursary committee to allocate Bursary funds to applicants.
- for the purpose of assisting the Teacher or Guidance Counsellor under Section B of the Application to provide the student recommendation.

Except when otherwise permitted by law, The Foundation will only use an Applicant's Personal Information for the purposes identified to that Applicant. When Personal Information is to be used for a purpose not identified, The Foundation will take all reasonable steps to ensure that the Applicant is made aware of the new purpose.

This policy establishes procedures that reflect the principles in PIPEDA.

In summary, the principles are:

1. Accountability
 - a. The Foundation's President is responsible for compliance with PIPEDA.
2. Identifying Purposes
 - a. Inform individuals about the purpose of collecting personal information
3. Consent
 - a. Obtain individuals' consent to collect, use and disclose personal information
4. Limiting Collection
 - a. Collect only the required personal information, in accordance with consent obtained
5. Limiting Use, Disclosure and Retention
 - a. Use and disclose personal information in accordance with consent obtained, and retain it for the appropriate period of time
6. Accuracy
 - a. Update personal information as required
7. Safeguards
 - a. Protect the personal information from loss or unauthorized access
8. Openness
 - a. Maintain open communication about this policy and procedures
9. Individual Access
 - a. Make personal information reasonably accessible to individuals
10. Challenging Compliance
 - a. Facilitate inquiries and complaints of individuals

Several provincial statutes have also been deemed substantially similar to PIPEDA. Under paragraph 26(2)(b) of PIPEDA, the Governor in Council can exempt an organization, a class of organizations, an activity or a class of activities from the application of PIPEDA with respect to the collection, use or disclosure of personal information that occurs within a province that has passed legislation deemed to be substantially similar to the PIPEDA. For more information, please visit the website for the Office of the Privacy Commissioner of Canada. https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/02_05_d_15/

PERSONAL INFORMATION – MANAGEMENT:

General: When an applicant requires further information about this procedure, they should speak to the designated contact.

Purposes and Consent: When personal information is to be collected, The Foundation must, at or before the time of collection, identify to the individual the reasons for collection, use, and disclosure of the personal information, and obtain their consent. This may be done by whatever means is suitable in the circumstances, and can be accomplished by a paper form, website, email, telephone, or other means. In all cases, a record should be kept of the consent received.

Retention Period: If, at the end of the indicated retention period, the personal information is the subject of an inquiry or complaint, or it has been recently used to make a decision about an individual, then the retention period should be extended by a reasonable amount of time.

Disclosure: Prior to disclosing personal information, The Foundation will refer to the intended use of the information indicated in this procedure. The Foundation must ensure that any disclosure is in keeping with the intended use.

Third Parties: When personal information is to be received from, or provided to, a third party, The Foundation will confirm by contract, letter, or other means, that the principles of the PIPEDA have been/will be followed.

New Purpose: When any Foundation process or initiative would require using or disclosing personal information for a new purpose not identified at the time of collection, The Foundation will seek consent from the individuals involved. This may be done by whatever means is suitable in the circumstances, and can be accomplished by telephone, email, mail, or other means. In all cases, a record should be kept of the consent received. (Note: consent is not required if the new purpose is required by law)

Personal Information – Inquiries and Complaints:

When The Foundation receives an inquiry or complaint about personal information, or The Foundation's compliance with PIPEDA, they shall provide the individual with a Personal Information Request Form. The form is available for printing from The Foundation's website, or staff can mail it to the individual. They shall also inform the individual that they should return the completed form by mail to The Foundation to the attention of the designated contact. There is no charge for an individual to access their personal information.

When the completed form arrives, the designated contact will, depending on the nature of the inquiry or complaint, investigate and respond, or delegate this task. In any case, the investigation and response should be completed in a reasonable period of time, and no more than the 30-day time limit specified in PIPEDA.

When the inquiry or complaint involves an amendment to personal information, the staff member responding will verify as required, prior to making the change. If The Foundation does not agree to the requested amendment, then staff will attach a statement of disagreement to the record. When the amendment has been made, or the statement of disagreement attached, staff will then notify third parties, if applicable.

Responsibility

The Foundation President is responsible for compliance with PIPEDA.

The designated contact for privacy matters is the Director of Corporate Services, who may be contacted at:

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