



PRIVACY POLICY

The Cancer Research Society (the Society) bases its privacy practices on the federal government's *Personal Information Protection and Electronic Documents Act* (PIPEDA), which is considered to be the standard in respect to the protection of personal information in Canada.

The Society also complies with the Code of Ethics (Appendix 1) and the Donor's Bill of Rights (Appendix 2) published by the Association of Fundraising Professionals. As an organization accredited by Imagine Canada's Standards Program, the Society demonstrates its high standards in matters of confidentiality and the privacy of its donors.

Definition of Personal Information

The Society defines "personal information" as any information that can be used to distinguish, identify, or contact a specific individual. Exceptions include business contact information and publicly available information such as name, address, and telephone numbers as published in telephone directories. When an individual uses his/her home contact information as business contact information, the Society considers that such information is not subject to protection to the same extent as personal information.

Our Commitment

The Society recognizes the importance of protecting the personal information of its members, partners, and donors. To this end, the Society commits to:

- Maintain the highest level of confidentiality with respect to the collection, use, and disclosure of personal information;
- Collect or use that information only after having informed its members, partners and donors, and for the sole purpose sought by them;
- Obtain their authorization before disclosing any personal information to a third party;
- Recognize their right to access their personal information;
- Be available to respond to their questions and concerns about the way the Society protects the confidentiality of their personal information.

Methods of Collecting Personal Information

There are no obligations to provide any personal information on the Society's website unless an individual chooses to do so. If an individual wishes to make an anonymous donation, they are invited to check the box provided at the beginning of the electronic donation form.

The Society asks for personal information on its "Donate Online" page. The Society asks for the same information when a donation is made by mail or by phone. The Society uses this information to process a donation and to write back to acknowledge a gift and to send a receipt for tax purposes. Note that names and other information will appear on the Society's mailing lists and be used for the following purposes:

- Correspondence (by post or electronic) and/or phone calls to request support from individuals;
- Correspondence (by post or electronic) and/or phone calls to invite supporters to special events;
- Electronic mailings to alert individuals on updated information and interesting features on the Society's website. Any email issued by the Society includes the possibility of withholding one's name from electronic mailing lists.

If a person does not wish their personal information to appear on the Society's solicitation list, they are invited to contact the Society as follows to advise them:

By e-mail at: info@src-crs.ca

By phone at 1-888-766-2262

**By mail to P.O. Box 4613, Station E, Ottawa ON K1S 1P7, or
625 President-Kennedy Avenue, Suite 402, Montreal QC H3A 3S5.**

It is possible to withdraw consent at any time.

Should a person wish to make a donation in honour or in memory of someone, the Society will not use the information provided about that person for any other purposes.

Disclosure to Third Parties

The Society may transfer the name of a donor to other non-profit organizations to enable them to contact the donor for the purpose of soliciting donations. If a donor does not want this information to be shared, he or she must check the box at the end of the donation form (paper format). It is also possible to inform the Society, by e-mail at info@src-crs.ca or by dialing 1-888-766-2262, listing name, postal or e-mail address, and telephone number, and mentioning that sharing their personal information is not permitted. When the Society uses other organizations to carry out functions on its behalf, they are required to use personal information only for the purpose of the functions they are providing and only in compliance with privacy laws.

Information from Other Sources

The Society occasionally uses mailing lists received from other organizations. In such cases, the Society requires that the organization provide only the names of individuals who have consented to the sharing of their information. If a person is contacted from one of these lists, it will be possible for that person to express their desire to receive further communications from the Society.

Guiding Principles

The Society commits to using the personal information in its possession only for the purposes explained in advance to the parties concerned. It will not use or communicate the information for any other reason without first obtaining the concerned party's informed consent.

Principle 1- Accountability

The Society is responsible for all personal information it keeps or manages. The Society's President and Chief Executive Officer is named Privacy Officer. The Privacy Officer may delegate to other employees the responsibility of managing the Society's privacy policy on an ongoing basis but the Privacy Officer remains responsible for the use of personal information.

Principle 2 - Identifying the Purpose of the Collection of Information

The Society will identify and state the purposes for which personal information is collected at or before the time the information is collected.

Principle 3 - Consent

The Society will obtain the informed consent of the individuals concerned at or before the time it collects, uses, or discloses personal information, unless specifically authorized by law.

Individuals can give consent in many ways and the form of the consent sought by the Society may vary, depending upon the circumstances and the type of information. In determining which form of consent it will require, the Society will take into account the nature of the personal information.

An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. The Society will inform the individual of the implications of such withdrawal of consent.

Principle 4 – Limits of Collection

The Society will collect only the personal information necessary for the purposes stated by the Society. Information shall be collected only by fair and lawful means.

Principle 5 – Limits of Use, Disclosure, and Retention

The Society will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law or regulations. Personal information will be retained only as long as necessary for the fulfillment of those purposes.

Principle 6 – Accuracy

The Society ensures that the personal information in its possession is as accurate, complete, and up-to-date as is necessary for the purposes for which it was collected.

Principle 7 – Safeguards

The Society will protect the security of personal information whatever its format. The Society's employees, volunteers, and authorized third parties who are granted access to personal information and data must respect the confidentiality of the information and data, and must use methods of protection, including:

- Physical measures, such as locked filing cabinets;
- Organizational measures, such as limiting access to personal information on a "need-to-know" basis;
- Technological measures, such as the use of passwords, encryption, and verification procedures.

Information Collected from the Society's Website

A. Credit Card Security

The Society is grateful to its donors for the donations it receives and that make it possible to continue its valuable work. It is important to the Society that the information provided by a donor when making an online donation remains secure. A donor's credit card information is therefore secured by a reputable security company. The information is used only for that particular transaction and is not stored.

Note: To ensure that payment information is secure, the Society uses the Blackbaud Merchant Services payment solutions gateway (BBMS). BBMS processes credit card information securely, in real time, using the latest available encryption technology. This means the donor's payment information cannot be read as it travels over the Internet to his credit-issuing institution. BBMS Payment Solutions is accredited by all financial institutions in North America.

B. Domain Name

The Society's web server automatically recognizes, but does not collect or use, the donor's domain name (IP address). The Society tracks the donor's visit anonymously in order to compile statistical information about the use of its website. The Society does not collect individual information about the donor or his/her use of this site.

C. Cookie Use

A cookie is a small amount of data that is sent to your browser from a web server and stored on your computer's hard drive. The Society does not use cookies to secretly collect any personal information from your computer. You can set your browser so that it does not accept cookies, but please note that doing so may interfere with your ability to use the Society's site.

D. E-mail Addresses

The Society's website does not perform automatic recognition of an individual's e-mail address. The Society collects the e-mail address of those who communicate with it by e-mail and asks for their e-mail address on its "Donate Online" page. If you communicate with the Society by e-mail, where your e-mail address is provided, The Society will send you regular e-mail updates. If you do not want to receive regular e-mail updates, you can either uncheck the box following the sections where you have provided your e-mail address, e-mail the Society at the address previously indicated, mail a letter at one of the addresses below, or follow the instructions at the bottom of any e-mail update you may receive.

**P.O. Box 4613, Station E, Ottawa ON K1S 1P7
402-625 President Kennedy Avenue, Montreal QC H3A 3S5**

E. E-mails to the Society

The Society uses e-mail links to allow you to contact it directly with questions or comments. This information is used to respond directly to your questions or comments. The Society may use your comments to improve its website and programs and may also file the e-mails you send to follow up on your comments.

F. Links to Other Sites

The Society's website includes links to other websites; it must be noted that the Society is in no way liable for the privacy policies of those sites. Once you leave the Society's servers (you can check where you are by looking at the URL in the location bar on your browser), the use of any information you provide is governed by the privacy policy of the operator of the other site you are visiting. That policy may differ from the Society's. If you can't find the privacy policy of any of these sites via a link from the site's homepage, you should contact the site directly for more information. The Society is not responsible for the privacy practices or the content of any websites other than its own.

Principle 8 – Transparency

The Society willingly provides, to the people who request it, specific information about its policies and practices relating to the management of personal information.

Principle 9 - Individual Access to Personal Information

Upon written request, and except for exemptions stipulated by law, the Society will inform an individual of the personal information contained in his/her file, of the specific purpose that the information is used for, and will provide a list of the third parties to whom the information has been communicated. Also upon written request, and except for exemptions stipulated by law, the Society will allow the person to be given access to that information. An individual may challenge the accuracy and completeness of the information and have it amended as appropriate.

Reasons for barring an individual's access to the information will be limited and specific. Examples include:

- The cost of providing the information is prohibitive;
- The information contains references to other individuals;
- The information cannot be disclosed for legal reasons, or because of security or commercial proprietary issues;
- The information is subject to lawyer-client confidentiality or to the protection of the information relating to a lawsuit or litigation.

Principle 10 - For Complaints

All complaints or requests for information should be addressed to privacy@src-crs.ca. This e-mail message box will be the subject of periodic follow-ups. Each question or complaint will be forwarded to the person responsible for the file at the appropriate administrative level, and that individual will be responsible for performing the required action and follow-up.

Appendix 1

AFP Code of Ethical Principles and Standards



ETHICAL PRINCIPLES • Adopted 1964; amended Sept. 2007

The Association of Fundraising Professionals (AFP) exists to foster the development and growth of fundraising professionals and the profession, to promote high ethical behavior in the fundraising profession and to preserve and enhance philanthropy and volunteerism. Members of AFP are motivated by an inner drive to improve the quality of life through the causes they serve. They serve the ideal of philanthropy, are committed to the preservation and enhancement of volunteerism; and hold stewardship of these concepts as the overriding direction of their professional life. They recognize their responsibility to ensure that needed resources are vigorously and ethically sought and that the intent of the donor is honestly fulfilled. To these ends, AFP members, both individual and business, embrace certain values that they strive to uphold in performing their responsibilities for generating philanthropic support. AFP business members strive to promote and protect the work and mission of their client organizations.

AFP members both individual and business aspire to:

- practice their profession with integrity, honesty, truthfulness and adherence to the absolute obligation to safeguard the public trust
- act according to the highest goals and visions of their organizations, professions, clients and consciences
- put philanthropic mission above personal gain;
- inspire others through their own sense of dedication and high purpose
- improve their professional knowledge and skills, so that their performance will better serve others
- demonstrate concern for the interests and well-being of individuals affected by their actions
- value the privacy, freedom of choice and interests of all those affected by their actions
- foster cultural diversity and pluralistic values and treat all people with dignity and respect
- affirm, through personal giving, a commitment to philanthropy and its role in society
- adhere to the spirit as well as the letter of all applicable laws and regulations
- advocate within their organizations adherence to all applicable laws and regulations
- avoid even the appearance of any criminal offense or professional misconduct
- bring credit to the fundraising profession by their public demeanor
- encourage colleagues to embrace and practice these ethical principles and standards
- be aware of the codes of ethics promulgated by other professional organizations that serve philanthropy

ETHICAL STANDARDS

Furthermore, while striving to act according to the above values, AFP members, both individual and business, agree to abide (and to ensure, to the best of their ability, that all members of their staff abide) by the AFP standards. Violation of the standards may subject the member to disciplinary sanctions, including expulsion, as provided in the AFP Ethics Enforcement Procedures.

MEMBER OBLIGATIONS

1. Members shall not engage in activities that harm the members' organizations, clients or profession.
2. Members shall not engage in activities that conflict with their fiduciary, ethical and legal obligations to their organizations, clients or profession.
3. Members shall effectively disclose all potential and actual conflicts of interest; such disclosure does not preclude or imply ethical impropriety.
4. Members shall not exploit any relationship with a donor, prospect, volunteer, client or employee for the benefit of the members or the members' organizations.
5. Members shall comply with all applicable local, state, provincial and federal civil and criminal laws.
6. Members recognize their individual boundaries of competence and are forthcoming and truthful about their professional experience and qualifications and will represent their achievements accurately and without exaggeration.
7. Members shall present and supply products and/or services honestly and without misrepresentation and will clearly identify the details of those products, such as availability of the products and/or services and other factors that may affect the suitability of the products and/or services for donors, clients or nonprofit organizations.
8. Members shall establish the nature and purpose of any contractual relationship at the outset and will be responsive and available to organizations and their employing organizations before, during and after any sale of materials and/or services. Members will comply with all fair and reasonable obligations created by the contract.

9. Members shall refrain from knowingly infringing the intellectual property rights of other parties at all times. Members shall address and rectify any inadvertent infringement that may occur.
10. Members shall protect the confidentiality of all privileged information relating to the provider/client relationships.
11. Members shall refrain from any activity designed to disparage competitors untruthfully.

SOLICITATION AND USE OF PHILANTHROPIC FUNDS

12. Members shall take care to ensure that all solicitation and communication materials are accurate and correctly reflect their organizations' mission and use of solicited funds.
13. Members shall take care to ensure that donors receive informed, accurate and ethical advice about the value and tax implications of contributions.
14. Members shall take care to ensure that contributions are used in accordance with donors' intentions.
15. Members shall take care to ensure proper stewardship of all revenue sources, including timely reports on the use and management of such funds.
16. Members shall obtain explicit consent by donors before altering the conditions of financial transactions.

PRESENTATION OF INFORMATION

17. Members shall not disclose privileged or confidential information to unauthorized parties.
18. Members shall adhere to the principle that all donor and prospect information created by, or on behalf of, an organization or a client is the property of that organization or client and shall not be transferred or utilized except on behalf of that organization or client.
19. Members shall give donors and clients the opportunity to have their names removed from lists that are sold to, rented to or exchanged with other organizations.
20. Members shall, when stating fundraising results, use accurate and consistent accounting methods that conform to the appropriate guidelines adopted by the American Institute of Certified Public Accountants (AICPA)* for the type of organization involved. (* In countries outside of the United States, comparable authority should be utilized.)

COMPENSATION AND CONTRACTS

21. Members shall not accept compensation or enter into a contract that is based on a percentage of contributions; nor shall members accept finder's fees or contingent fees. Business members must refrain from receiving compensation from third parties derived from products or services for a client without disclosing that third-party compensation to the client (for example, volume rebates from vendors to business members).
22. Members may accept performance-based compensation, such as bonuses, provided such bonuses are in accord with prevailing practices within the members' own organizations and are not based on a percentage of contributions.
23. Members shall neither offer nor accept payments or special considerations for the purpose of influencing the selection of products or services.
24. Members shall not pay finder's fees, commissions or percentage compensation based on contributions, and shall take care to discourage their organizations from making such payments.
25. Any member receiving funds on behalf of a donor or client must meet the legal requirements for the disbursement of those funds. Any interest or income earned on the funds should be fully disclosed.

Appendix 2

A Donor Bill of Rights

PHILANTHROPY is based on voluntary action for the common good. It is a tradition of giving and sharing that is primary to the quality of life. To ensure that philanthropy merits the respect and trust of the general public, and that donors and prospective donors can have full confidence in the non-for-profit organizations and causes they are asked to support, we declare that all donors have these rights:

I.

To be informed of the organization's mission, of the way the organization intends to use donated resources, and of its capacity to use donations effectively for their intended purposes.

VI.

To be assured that information about their donations is handled with respect and with confidentiality to the extent provided by law.

II.

To be informed of the identity of those serving on the organization's governing board, and to expect the board to exercise prudent judgment in its stewardship responsibilities

VII.

To expect that all relationships with individuals representing organizations of interest to the donor will be professional in nature.

III.

To have access to the organization's most recent financial statements.

VIII.

To be informed whether those seeking donations are volunteers, employees of the organization or hired solicitors.

IV.

To be assured their gifts will be used for the purposes for which they were given.

IX.

To have the opportunity for their names to be deleted from mailing lists that an organization may intend to share.

V.

To receive appropriate acknowledgement and recognition.

X.

To feel free to ask questions when making a donation and to receive prompt, truthful and forthright answers.

DEVELOPED BY:

Association of Fundraising Professionals (AFP)
Association for Healthcare Philanthropy (AHP)
Council for Advancement and Support of Education (CASE)
Giving Institute: Leading Consultants to Non-Profits

ORIGINALLY ENDORSED BY:

Independent Sector
National Catholic Development Conference (NCDC)
National Committee on Planned Giving (NCPG)
Council for Resource Development (CRD)
United Way of America

Adopted in 1993

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