



**CLARINGTON EAST FOOD BANK
GOVERNANCE AND ADMINISTRATION
#1.12 Privacy and Confidentiality Policy**



#1.12 Privacy and Confidentiality Policy	
Policy Section: Governance and Administration	Original Date: Aug. 01, 2023
Approved By: Board of Directors	Review Date: March 2026
Review By: Executive Director and Board of Directors	Applies to: Neighbours, Employees, Directors, and Volunteers
Standard of Excellence 1.12	# of Pages: 4

1. DEFINITIONS

1. **Personal Information:** any information that can be reasonably used to directly or indirectly identify an individual and may include an individual’s name, address, email, telephone number, age, internet protocol (*IP*) address, financial information, etc.
2. **PIPEDA:** Canadian Personal Information Protection Electronic Document Act that dictates how organizations collect and use personal data.

2. POLICY

CEFB is committed to the 10 privacy principles under Personal Information **Personal Information Protection Electronic Document Act** (PIPEDA)

3. PURPOSE:

The purpose of this policy is to establish the rules of the collection, use, and disclosure of personal information entrusted to CEFB by its neighbours, employees, volunteers, and board members.

4. PROCEDURE:

1. **Accountability:** CEFB is responsible for personal information in our custody or under our control.
2. **Identifying Purposes:** CEFB collects and uses personal information for the following purposes:
 - a. To provide tax receipts
 - b. To administer pre-authorized recurring donations
 - c. To generate statistics and aggregate reports for internal and external use
 - d. To communicate directly with users
 - e. To provide you with information, products, or services that you request from us
 - f. To fulfill the purposes for which you provided the information, or that were described when it was collected, or any other purpose for which you provide it



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- g. To improve our services, fundraising, or donor and volunteer relationships and experiences
 - h. Employee information is collected using F1.12.03 Employee Information Sheet.
3. **Consent:** CEFB
- a. collects personal information about you only when you voluntarily provide it, or otherwise only with your consent as required by PIPEDA or by other applicable law
 - i. All Employees, Volunteers, and Board Members consent to the collection and disclosure of their personal information within their respective forms: Employment Agreement, Volunteer Application form, and Board Application Form.
 - ii. Neighbours' personal information is collected on our Application form for the sole purpose of the Hunger Count statistics in Link 2 Feed. Service will NOT be denied if a Neighbour chooses not to disclose data.
 - iii. Media & Photography Consent: All Employees, Volunteers, Neighbours, and Board Members have the option to provide consent for social media and photography usage via the F1.12.02 Media Release Form.
 - b. Upon giving CEFB reasonable notice, an individual may withdraw consent to use his or her personal information at any time, subject to any legal or contractual restrictions
4. **Limiting Collection:** CEFB limits the collection of personal information to that which is reasonably necessary for the identified purpose.
5. **Limiting Use, Disclosure and Retention:**
- a. CEFB does 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 permitted or required by law
 - b. CEFB takes all reasonable steps to ensure that the information provided, is not used for the purposes other than those for which the information was obtained.
 - c. CEFB shall retain personal information provided to it, only for so long as it is required for the purposes as stated above. Once personal information is no longer required for the stated purposes, or upon request of an individual constituent, such information shall be disposed of in a secure manner (see 3.09.01 Data Protection Policy).
6. **Accuracy:** CEFB takes reasonable effort to keep personal information accurate, complete, and as up-to-date as is necessary for the purposes for which it is being used.



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Individuals are permitted to check on the accuracy of their personal information and may request or make modifications or corrections, if necessary.

7. **Safeguards:**

- a. Access to personal information is based only on their need to deal with the information for the reason(s) for which it was obtained. Safeguards are in place to help ensure the information is not disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered, or those permitted under this Privacy Policy.
- b. We also use physical, electronic, and administrative measures to help ensure the integrity of this information is maintained and to prevent personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. (see 3.09.01 Data Protection Policy and 3.09.02 IT Security and Device Maintenance Policy)
- c. The CEFB Board Directors, Executive Director (ED), Staff or Volunteers are not to use or distribute any personal information. Annually, these individuals acknowledge the requirement for Confidentiality using F1.12.01 Waiver Agreement.
- d. If a Breach in Privacy has occurred, at the next Board Meeting the corrective actions will be reported to the Board by either the Board Chair or Executive Director (ED).

8. **Openness:**

- a. Our Privacy Policy is posted on our website.
- b. CEFB shall provide, upon request, additional information about its policies and practices respecting the management of personal information.

9. **Individual Access:** CEFB allows individuals access to their personal information when requested. When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access.

10. **Challenge Compliance:** An individual is able to challenge the accuracy and completeness of the information and have it amended or deleted as appropriate.

5. **ROLES AND RESPONSIBILITIES**

1. ED is responsible for communication and implementation of this policy with Staff, Neighbours and Volunteers.
2. Board Chair is responsible for ensuing communication and implementation of this policy with Board members.
3. ED is responsible to ensure privacy policy is posted on CEFB website.



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6. REFERENCES AND SOURCES

1. Personal Information Protection Electronic Act (PIPEDA)
2. Food Banks Canada Privacy Policy

7. APPENDIX

Document Name
F1.12.03 Employee Information Sheet
F1.17.01 Board Member Application Form
F2.05.01 Volunteer Application
F1.12.02 Media Release
F1.12.01 Confidentiality Agreement

8. REVISION CONTROL

Date	Revision Details	Revision #	Effective
September 2025	Revised procedure to align with 10 privacy principles of PIPEDA. Deleted Privacy and confidentiality declaration and incorporated into Waiver Agreement.	Revision #1	Sept. 17, 2025
March 2026	Added in Section 4.2 h: Employee Information Sheet added Section 4.3.a.i: deleted F1.12.01 CEFB Waiver and referenced the individual forms for Employees, Volunteers and Board Members. Section 4.3a (Consent) Added in Media and Photography Consent	Revision # 2	March 18, 2026