



QUAKERS

Canadian Friends
Service Committee

Canadian Friends Service Committee *Privacy policy*

Commitment to privacy

Personal information is any information that can be used to identify or contact an individual.¹ Exceptions include publicly available² and business contact information. CFSC is committed to protecting the privacy, confidentiality, accuracy, and security of personal information that is collected, used, retained, and disclosed in compliance with the applicable federal *Personal information protection and electronic documents act* (PIPEDA) and provincial privacy legislation.

All personal information obtained, compiled, maintained, and disclosed for CFSC by third-party agents and contractors must comply with standards comparable to this policy and applicable law. Contractual provisions requiring such compliance are incorporated into all third-party agent and contractor agreements.

Privacy principles

For handling personal information, CFSC will follow the privacy principles set out in *Personal information protection and electronic documents act* (Schedule 1), which are:³

1. **Accountability:** CFSC is responsible for personal information it collects, uses, retains, and discloses in the course of carrying out its work. This includes personal information that has been transferred to, or received from, a third party in the course of activities or purposes for which consent has been given.

¹ Personal information includes information in any form (e.g. printed/electronic) including home address, home phone number, age, personal e-mail address, race, national or ethnic origin, colour, religion, sexual orientation, marital status, mental or physical disability, family members' names, employee files, identification numbers, evaluations, disciplinary actions, the existence of a dispute and related opinions, comments, social status, income, credit and bank records, donation information, loan records, or medical records.

² Any personal information lawfully made available (e.g. certain government records, media).

³ Further information can be found on the website of the Privacy Commissioner of Canada: <https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/>

CFSC will designate a staff person as the Privacy Officer to ensure compliance with this *Privacy policy*.

2. *Identifying purposes*: CFSC will explain the purposes for which the information is being used at the time of collection. Personal information can only be used for the purposes for which it is collected. Specific permission must be sought if personal information is to be used for any other purpose than that for which it was initially collected. Currently, CFSC collects personal information for the following intended purposes:
 - Employee records.
 - Emergency contact information.
 - Salary and benefits records.
 - Information required for organizational records.
 - Fundraising and donor information.
 - Board Member information.
 - Legal/regulatory requirements.
 - Distribution of communications and publications.
3. *Consent*: CFSC will obtain an individual's express or implied consent when it collects, uses, or discloses the individual's personal information, except where required by law. This includes allowing users of CFSC websites to opt-out of all non-essential cookies.
4. *Limiting collection*: CFSC will limit the collection of personal information to only the amount and type that is reasonably necessary for the identified purposes. This includes limiting the use of cookies on CFSC websites to only include ones necessary to provide a high quality user experience.
5. *Limiting use, disclosure, and retention*: personal information must be used for only the identified purposes, and must not be disclosed to third parties unless the individual consents to the alternative use or disclosure or is required by law. If personal information is transferred to a third party for processing (e.g. when printing cheques, managing claims and client statements, or for data processing) the person or organization providing the services on our behalf is required to protect confidentiality of all information in a manner consistent with this policy or as required by law.

Personal information is retained only as long as it is required to meet any potential obligations or legal or government requirements. Once the personal information is no longer required, it will be destroyed except in cases where federal and/or provincial retention rules apply. In some cases, records are of archival value and transferred to the archives where restrictions are in place consistent with privacy standards.

In some cases, in order to do their work, personal information may be retained on personal electronic devices (laptops, tablets, cell phones, etc.) used by CFSC staff or volunteers. Safeguards (see below) are to be used to protect this information in all such cases. Staff and volunteers must delete all such information from personal devices as soon as it is no longer required to perform their work duties, such as when a CFSC Member's term ends.

6. *Limiting the sharing of data with AI systems:* CFSC Members and staff are prohibited from sending any personal information to artificial intelligence (AI) systems including large language models or search engines.

Turning on AI features in software that CFSC uses, such as Zoom, may be considered to give consent to the software company to use AI to gather and retain data, such as what people say on a Zoom call. For this reason, on all calls where personal information is being discussed, AI companions, smart summaries, and other AI tools and data retention must be turned off.

CFSC is aware that the contents of emails to some common providers like Gmail may be collected and used to train AI. Therefore CFSC shall refrain from emailing personal information to such accounts unless absolutely necessary.

7. *Accuracy:* CFSC will keep personal information in active files accurate and up to date as is necessary for the purposes for which it is to be used.
8. *Safeguards:* CFSC will use safeguards to protect personal information from unauthorized access or disclosure. Personal information is to be stored under lock and key or is password protected if in electronic format, and only certain authorized individuals have access to it.
9. *Openness:* CFSC will readily make available to individuals and staff information about its privacy policies and procedures relating to the management of their personal information.
10. *Individual access:* individuals have the right to access personal information held by CFSC and to challenge its accuracy if need be. This right extends to knowing which third parties have received this information from CFSC. Written requests should be made to the Privacy Officer (designated staff person) stating as specifically as possible which personal information is being requested. Subject to exceptions stipulated by law, CFSC will inform the individual of the existence, use, and disclosure of their personal information and will provide access to that information. CFSC has the right to refuse a request for access to personal information if:
 - The information is protected by solicitor-client privilege.
 - Granting access would reveal confidential financial information.

- Doing so would reasonably be expected to threaten the safety or security of another individual.
- The information was collected for purposes related to the detection and prevention of fraud.
- The information was generated in the course of a formal dispute resolution process.
- The information would likely reveal personal information about another individual.

11. *Provide recourse:* individuals can address any concerns or questions with regard to compliance with the above principles to the Privacy Officer or General Secretary.