



CPM Canadian Property Maintenance Inc. Privacy Policy Statement

CPM is committed to protecting the privacy of its donors, volunteers, employees, and other stakeholders.

We value the trust of those we deal with and of the public, and we recognize that maintaining this trust requires us to be transparent and accountable in maintaining the confidentiality of the personal information that you choose to share with us.

This privacy policy statement outlines the principles that CPM applies in order to ensure the confidentiality and integrity of your personal information.

Definitions

Personal information - is information that is recorded in any form, both fact and opinion, and that can be used to distinguish, identify, or contact a specific individual. It does not include business contact information and certain publicly available information, such as names, addresses, and telephone numbers as published in telephone directories.

Donor - is any individual or organization that contributes funds to CPM.

Employee - This policy's definition of employee includes a volunteer. Hence, this pertains to both paid and volunteer workers for CPM.

Principles

Accountability:

We are responsible for the personal information under our control. While senior management is ultimately accountable for the protection of personal information, a designated Privacy Officer is responsible for monitoring practices and procedures to ensure compliance with the principles set out in this policy.

We are responsible for personal information in our possession or custody, including information that has been transferred to a third party for processing. We will use contractual or other means to provide a comparable level of protection when a third party is processing the information.

Purpose:

We will identify and document the purposes for which we collect, use, or disclose personal information at or before the time of collection.

The purposes will be limited to those which are related to our business and which a reasonable person would consider appropriate in the circumstances. We collect, use, and disclose personal information concerning our donors for the following reasons:

- to establish a relationship and to communicate with donors;
- to understand who our donors are and how we may improve our services to meet their preferences and expectations;
- to process a donation, for example, to process a credit card transaction;
- to issue and deliver a donation tax receipt;
- to distribute a designated donation to another registered charity;
- to recognize contributions;
- to respond to requests for information;
- to meet requirements imposed by law.

We collect, use, and disclose personal information concerning our employees and/or volunteers for the following reasons:

- to recruit, train, recognize, and retain highly qualified and motivated employees and volunteers;
- to establish and maintain harmonious employer-employee relations;
- to administer united way policies and procedures;
- to manage and promote the philanthropic activities of united way;
- to administer compensation and benefits;
- to meet requirements imposed by law.

If we plan to use personal information we have collected for a purpose not previously identified, we will identify and document this purpose before such use.

We will make a reasonable effort to specify the identified purposes, orally or in writing, to the individual from whom the personal information is collected either at the time of collection or after collection but before use. We will state the identified purposes so that an individual can reasonably understand how the information will be used or disclosed.

Consent

Personal information will only be collected, used, or disclosed with the knowledge and consent of the individual, or as required by law.

The way in which we seek consent, including whether it is express or implied, may vary depending upon the sensitivity of the information and the reasonable expectations of the individual. An individual can withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. We will inform individuals of any implications of withdrawing consent.

Typically, we will seek consent for the use or disclosure of information at the time of collection. In certain circumstances, consent may be sought after the information has been collected but before use (such as where we want to use information for a purpose not previously identified).

Limiting Collection

We will limit the amount and type of personal information collected to that which is necessary for our identified purposes and we will only collect personal information by fair and lawful means.

Limiting Use, Disclosure, and Retention

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information will be retained only as long as necessary to fulfil the identified purposes.

Personal information which has been used to make a decision about an individual will be retained long enough to allow the individual access to the information after the decision has been made and, in the event of an access request or a challenge, long enough to exhaust any recourse an individual may have under the law. Where personal information is no longer required to fulfil the identified purposes, it will be destroyed, erased, or made anonymous.

Accuracy

We will use our best efforts to ensure that personal information, including information that is disclosed to third parties, is as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

Safeguards

We will protect personal information with safeguards appropriate to the sensitivity of the information.

Our safeguards will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which the information is held. We will make our employees and volunteers aware of the importance of maintaining the confidentiality of personal information, and we will exercise care in the disposal or destruction of personal information to prevent unauthorized parties from gaining access to the information.

Our methods of protection will include physical measures (for example, locked filing cabinets and restricted access to offices), organizational measures (for example limiting access on a "need-to-know" basis), and technological measures (for example, the use of passwords and encryption).

Openness Concerning Policies and Practices

We will make readily available to donors and employees specific information about our policies and practices relating to the management of personal information.

The information we will make available will include: how to gain access to personal information; the type of personal information held by us, including a general account of its use; general information concerning our policies; what personal information is made available to other United Ways or a donor's designated agencies; and how to contact our Privacy Officer.

Individual Access

Upon written request, we will inform an individual of the existence, use, and disclosure of his or her personal information and we will give the individual access to that personal information. An individual can challenge the accuracy and completeness of his or her personal information and have it amended as appropriate.

We will respond to an individual's written request within a reasonable time (generally within 30 days). We will assist any individual who informs us that they need assistance in preparing a request. We may require an individual to provide sufficient information to permit us to provide an account of the existence, use, and disclosure of personal information.

While our response will typically be provided at no cost, depending on the nature of the request and the amount of information involved, we reserve the right to impose a cost. In these circumstances, we will inform the individual of the approximate cost to provide the response and request direction from the individual on whether or not to proceed with the request. Requested information will be provided or made available in a form that is generally understandable. Where possible, we will indicate the source of the information.

In providing an account of third parties to which we may have disclosed personal information about an individual, we will attempt to be as specific as possible.

If an individual successfully demonstrates the inaccuracy or incompleteness of personal information, we will amend the information as required. If a challenge is not resolved to the satisfaction of the individual, we will record the substance of the unresolved challenge. Where appropriate the amended information or the existence of the unresolved challenge, as the case may be, will be transmitted to third parties having access to the information in question.

In certain situations, we may refuse a request or not be able to provide access to all the personal information we hold about an individual. Exceptions to the access requirement will be limited and specific, as permitted or required by law. Where permitted, the reasons for denying access will be provided to the individual upon request.

Recourse

Any individual can address a challenge concerning our compliance with any of the Privacy Principles to our Privacy Officer.

We will investigate all written complaints. If we find a complaint to be justified, we will take all appropriate measures, including, if necessary, amending our policies and practices.