



## **BREAKFAST CLUB OF CANADA PRIVACY POLICY**

### **1.0 Purpose**

The purpose of this Privacy Policy (the “Policy”) is to outline the commitment of the Breakfast Club of Canada (“Breakfast Club”, “we” or “our”) to respect the privacy of individual persons, and to provide information to our various stakeholders as to the collection, use, protection and disclosure of individual personal information. We are mindful of the trust over your individual personal information you have provided to the Breakfast Club, and we will work diligently to protect your information.

### **2.0 Objective**

The objective of this Policy is to define individual personal information and to define the Breakfast Club’s role and responsibility in protecting individual privacy.

### **3.0 Personal Information**

Individual personal information refers to certain information about an identifiable individual. Importantly, it excludes certain business contact information such as name, title, business address or business telephone number (including business cellular phone number) of an employee of an organization. In order for this Policy to apply, the personal information must either relate specifically to an individual, identify or make it possible to identify an individual through the use of the personal information.

The areas that the Breakfast Club collects and uses individual personal information includes:

**Community Beneficiaries:** The Breakfast Club’s mission is to ensure school children across Canada have the opportunity to enjoy a nutritious breakfast prior to starting the school day. In this regard, we may collect personal information about the school children we serve, their parents, guardian or legal representative. The Breakfast Club may gather and use individual personal information about these individuals to keep these individuals informed about relevant Breakfast Club activities.

**Volunteers:** The Breakfast Club will collect and use individual personal information concerning volunteers to establish and maintain the relationship with our volunteers, assist our volunteers to perform their volunteer roles and responsibilities, or keep volunteers informed as to ongoing Breakfast Club activities.

**Donations:** The Breakfast Club will collect and use individual personal information that is necessary to process credit card donations, issue income tax receipts, establish a donation history with the intention to confirm opportunities for renewal of giving, communicate with donors about additional giving

opportunities and the activities of the Breakfast Club, acknowledge and recognize donations, and comply with required local, provincial, and federal regulatory reporting requirements.

**Event Notifications:** The Breakfast Club will collect and use individual personal information in order to communicate with individuals about upcoming Breakfast Club events, promotions or contests that they may wish to participate in, recognize award and participation prizes, and comply with required local, provincial, and federal regulatory reporting requirements.

**Workplace Campaigns:** The Breakfast Club supports organizations that desire to operate internal employee donation programs. In these campaigns, the Breakfast Club may be provided with employee names, addresses and donation amounts in order to manage the workplace donation campaign. For those employees who make donations, we will collect and use the personal information for the same purposes as outlined in Donations above.

**Breakfast Club Employees:** The Breakfast Club will collect and use individual personal information about our employees to initiate, maintain, administer and terminate the employment relationship. The uses will include the ongoing obligations relating to payroll processing, benefits and pension administration.

## **4.0 Privacy Principles**

The principles below reflect our commitment to you to protect the privacy of individual personal information:

### **4.1 Accountability**

The Breakfast Club is responsible for the individual personal information it has in its possession. This includes any personal information that is transferred to a third party for processing or administrative purposes.

### **4.2 Consent**

Your consent can be either expressed or implied. Expressed consent may be obtained from you either in writing, verbally or electronically. Implied consent is consent that is inferred by either an action or inaction on your part.

The Breakfast Club will only obtain individual personal information about its stakeholders in a lawful and fair manner. Further, we will only collect, use or disclose your individual personal information with your consent, except that there may be certain circumstances where individual personal information can be collected, used or disclosed without your knowledge or consent. These circumstances may include compliance with a court order, local, provincial or federal regulation, or a legally-authorized inquiry.

### **4.3 Identifying Purposes for Collecting Information**

The Breakfast Club will only collect, use and disclose individual personal information about you for the purpose for which it is collected. This purpose will be disclosed to you at the time that the information is collected.

#### 4.4 Limiting Use and Collection

Personal information collected for a specific purpose will not be used for any alternate purposes without your consent. We will also not collect additional personal information than that which is required for the stated purpose.

#### 4.5 Disclosure of Information

The disclosure of individual personal information will only be conducted after we obtain your express consent, or as required by laws and regulations applicable to the Breakfast Club.

#### 4.6 Retention

We will only retain your individual personal information for as long as required to satisfy the purpose for which it was collected, or as otherwise required by law.

When we destroy or dispose of your personal information, we will ensure that appropriate measures are taken to prevent unauthorized parties from accessing your personal information.

#### 4.7 Accuracy of Information

We have developed procedures to ensure that the individual personal information we have in our possession is accurate and current for the purpose for which it was originally collected. However, we rely on you to provide notice to us when your personal information in our possession is no longer current and needs to be updated.

#### 4.8 Security of Information

The individual personal information in our possession is secured by various physical, technological and organizational measures against access by unauthorized persons, loss, theft, disclosure or modification. Your personal information will be protected by reasonable safeguards that are relevant to the level of sensitivity of the information on file.

Donors' credit card information is handled in accordance with the Payment Card Industry Data Security Standards.

#### 4.9 Access to Information

Stakeholders may contact the Breakfast Club to inquire whether we hold individual personal information about you. In the event that we do hold personal information about you, you have the right to see your information, inquire how it is being used and whether it has been shared with a third party, and assess its accuracy.

We request that stakeholders who wish to inquire about access to their information make such requests in writing by either e-mail to [privacyandcomplaintsofficer@breakfastclubcanada.org](mailto:privacyandcomplaintsofficer@breakfastclubcanada.org) or by mail to:

Attention: Privacy Officer  
Breakfast Club of Canada  
135-G de Mortagne Boulevard  
Boucherville, Quebec  
J4B 6G4

Before we disclose any individual personal information to you, we will need to verify your identity. We also reserve the right to charge a reasonable fee to cover the cost of providing the information to you, however we will inform you of the approximate cost prior to providing the information to you.

At any time, an individual may withdraw consent for the use or disclosure of personal information. This request will be honoured subject to any legal or contractual requirements.

## **5.0 Website Cookies**

We collect two distinct types of information when you visit our Breakfast Club website – individual personal information (e.g., credit card information when making a donation) and information that is a result of your interaction with the website. This latter type of information is commonly referred to as cookie, which is a set of data that is sent to a web browser and tracks a user's travel through the various sections of a website. Cookies can be deleted by a user at any time, and this will not have a significant negative impact on a user's ability to view the Breakfast Club website.

## **6.0 Hyperlinks and Third Parties**

The Breakfast Club website may contain links to third party websites that are outside our control. When you leave the Breakfast Club website, you are then subject to the privacy policy provisions of that third party.

## **7.0 Revisions to the Privacy Policy**

From time to time and at its sole discretion, the Breakfast Club may revise this Privacy Policy, without providing notice to you. The current Policy may be found on the Breakfast Club website at [www.breakfastclubcanada.org](http://www.breakfastclubcanada.org). We recommend that you visit our website periodically to view the most current Privacy Policy.

Effective January 1, 2019