

## HELP LESOTHO PRIVACY POLICY 204-19

### 1. OBJECTIVE

The objective of this policy is to protect the privacy of the personal information of Help Lesotho's employees, volunteers, members of the Board, beneficiaries, donors and other stakeholders and to ensure that any use of, or other dealing with, this information is subject to consent.

### 2. DEFINITIONS

**Board** refers to the Board of Directors of Help Lesotho

**Staff** refers to the staff of Help Lesotho

**Personal information** is any information that can be used to distinguish, identify or contact a specific individual. This information can include an individual's opinions or beliefs, as well as facts about, or related to, the individual. Business contact information and publicly available information, such as names, addresses and telephone numbers as published in telephone directories or on the internet, are not personal information.

**Volunteers** refers to those who contribute their time and/or services to Help Lesotho willingly and without remuneration

**Donors** refers to individuals and corporations who donate money or other gifts to Help Lesotho

**Beneficiaries** refers to those individuals or families that benefit from the programs of Help Lesotho

### 3. POLICY STATEMENT

**3.1** Help Lesotho is committed to protecting the privacy of the personal information of its employees, volunteers, Board members, beneficiaries, donors and other stakeholders. We value the trust of those we deal with, and of the public, and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the information that they choose to share with us.

**3.2** Help Lesotho considers donor and volunteer information always to be personal information, and will not disclose information about donors or volunteers without consent.

**3.3** Help Lesotho observes the following practices when collecting, maintaining and using personal information:

## **Consent**

An individual's consent is required regarding the collection and proposed use of personal information when such information is collected. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from an individual's action or inaction. An individual's expressed consent is required before personal information is released to individuals or organizations external to Help Lesotho.

## **Limited Collection**

The collection of personal information is limited to that which is relevant and necessary to our programs and fundraising efforts. Help Lesotho shall not make unwarranted or intrusive inquiries into a donor or prospect's gift history or personal life. Help Lesotho attributes all data that it collects.

## **Limited Use, Disclosure and Retention**

Personal information shall 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 shall be retained only as long as necessary for the fulfillment of those purposes.

## **Accuracy**

Personal information shall be as complete, accurate and up-to-date as possible. Upon request, donors may review, correct and update personal information held by Help Lesotho.

## **Security Safeguards**

Personal information gathered by Help Lesotho shall be kept in confidence. Help Lesotho personnel shall be authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained.

Appropriate physical and electronic measures shall be used to ensure personal information is secure. Access to donor and volunteer records shall be limited to those who require such information to fulfill their job responsibilities. Special protection shall be given to all records pertaining to anonymous donors. The confidentiality of donor and volunteer records shall continue after the relationship with the individual has ended.

## **Confidentiality**

Donors who request that their name and/or the amount of the gift not be publicly released shall remain anonymous.

## **Openness**

Upon request, individuals shall be given access to the information in their donor record. When appropriate Help Lesotho will also inform its employees, volunteers, Board members, beneficiaries, donors and other stakeholders that further information on privacy and their rights in regard to their personal information may be found on the website of the Privacy Commissioner of Canada at [www.privcom.gc.ca](http://www.privcom.gc.ca).

## **Complaints**

Any complaints relating to the implementation of this policy, other than those of Help Lesotho employees, shall be handled through procedures set out in Help Lesotho's External Complaints Policy (300-13). Complaints of Help Lesotho employees shall follow procedures set out in the organization's Employee Policy Handbook.

## **4. ROLES & RESPONSIBILITIES**

**4.1** The Executive Director in Canada and the Country Director in Lesotho has responsibility for the effective implementation of this policy

**4.2** The Executive Director and the Country Director, when signing annually their respective Legal and Policy Compliance Checklist, shall confirm that they are complying with the law protecting personal information as captured in this policy.

## **5. COMMUNICATING THIS POLICY**

**5.1** This policy shall be posted on the Help Lesotho website.

## **6. REVIEW & EVALUATION OF THIS POLICY**

**6.1** The Board shall review this policy within five years of its most recent adoption and decide whether further evaluative work is necessary. A record of the review will be recorded in writing and attached to the policy.

## **7. DATE OF ENACTMENT AND SIGNATURES**

This policy was adopted by the Board of Directors of the Help Lesotho at a duly constituted meeting on September 26, 2013. At a duly constituted meeting held on May 13 2019, the Board reviewed and approved a revised version of this policy.