



# ENVIRONMENT FUNDERS CANADA

Advancing a sustainable future

## **Privacy Policy**

Environment Funders Canada (EFC) is a network that catalyzes 75+ diverse philanthropic funders to respond to environmental crises in Canada with ambitious and innovative solutions that also address intersecting economic, social, equity and wellbeing challenges. Members are supported in these efforts with in-person and virtual learning and strategy sessions, collaborative funding opportunities, an annual conference, networking, knowledge dissemination and thought leadership products.

## **Our Privacy Commitment to You**

EFC is committed to keeping your personal information accurate, confidential, secure and private.

When you visit our website, contact us, participate in one of our programs or attend an event, or make a donation to support our activities, we are committed to protecting your privacy rights and your personal information.

EFC's privacy policy is based upon the 10 Privacy Principles contained within the Canadian Standards Association (CSA) Model Privacy Code for the Protection of Personal Information and reflects the requirements of applicable legislation including the Freedom of Information and Protection of Privacy Act (FIPPA).

This Privacy Policy describes the principles that EFC will use to protect the privacy of your personal information in its possession. It addresses the reasons why such information is collected, how it is used, how it's confidentially protected and outlines your rights with respect to this information.

This privacy policy is applicable to our Members, Partners, Funders, Volunteers, Contractors, Employees and the General Public.

Personal information is defined as any factual or subjective information, recorded or not, about an identifiable individual. Examples are age, name, home address, email address and telephone numbers. Personal information does not include organizational affiliation, unless requested.

## **1. Accountability**

Environment Funders Canada is responsible for the protection of your personal information collected through our office(s), program activities and website. EFC's Executive Director is designated as EFC's

Privacy Officer and has overall responsibility for the protection of personal information and for EFC's compliance with this Privacy Policy.

Devika Shah, Executive Director  
Privacy Officer  
Environment Funders Canada, Suite 200, 2 St Clair East, Toronto, ON, M4T 2T5  
Phone: (647) 288-8891; Email: devika@environmentfunders.ca

**EFC's Privacy Officer responsibilities include:**

- Clearly articulating the uses of personal information
- Training employees in correct practices
- Compliance monitoring
- Reporting and dispute resolution as outlined in the EFC Complaint Policy.

**2. Identifying Purposes**

EFC will provide a statement to explain the purpose(s) for the collection of your personal information wherever possible, before we ask you to disclose it.

Personal information may be collected electronically or on paper, and both forms will be treated the same way.

We collect non-personal information about our members and their activities.

We collect personal data when you make use of or register for our programs and services, in order to better meet your membership, program, service and information needs.

We also use and disclose data, which does not identify individuals, for statistical purposes to assess, develop and improve EFC's programs and services.

We also collect personal information in order to refer you to enhanced services, or to satisfy legal, government and regulatory obligations.

We do not sell personal information we collect.

We will not disclose your personal information to anyone else without your prior knowledge or consent, except when required by a government body or agency, or as permitted by law.

If you supply us with your contact information, you may hear from us about important information concerning EFC's program or service for which you are registered.

You may also hear from us about other EFC programs and services that may interest and benefit you or we may ask you for feedback about the services you have already received as part of our quality assurance commitment. If you do not wish to receive information about other EFC programs, services or opportunities, please email [info@environmentfunders.ca](mailto:info@environmentfunders.ca).

**3. Using our Website**

You can access our website home page and browse our site without disclosing your personal data. Any personal information that site visitors voluntarily choose to provide in order to receive free electronic

newsletters, participate in periodic polls and surveys and/or to complete any of our online application forms IS NOT shared with third parties unless stated otherwise. EFC will ensure all personal information is secured and remains confidential.

#### EFC's Use of Cookies

A cookie is a small text file containing a unique identification number that is transferred from a website to the hard drive of your computer so that the website may identify separate visitors to the site and track users' activities on the website. A cookie will not let a website know any personally identifiable information about you, such as your real name and address.

EFC uses cookies only to keep track of how many people visit the EFC's website and how frequently each page is visited. Each individual movement of any user cannot be tracked while on the EFC's site. Cookies are only used to track page popularity for statistical purposes and to improve the quality of the site and meet your needs. (For more information on cookies, please check your browser's settings.)

#### Links on our Website

Because EFC wants your website experience to be informational and resourceful, our website also provides a number of links to third party sites. EFC assumes no responsibility for the information practices of sites you are able to access through our site. We encourage you to review each site's privacy policy before disclosing any personally identifiable information.

#### **4. Consent to Collection of Your Information**

EFC only collects your personal information with your knowledge and consent.

You can choose not to disclose any personal information we may ask you to provide. However, a decision to withhold some personal information can result in our inability to provide you with our services.

Further, you can withdraw your consent to the collection, use or disclosure of your personal information at any time, subject to any legal requirements and reasonable notice by emailing [info@environmentfunders.ca](mailto:info@environmentfunders.ca).

#### **5. Limiting Collection**

The amount and type of information that EFC collects is limited only to that which is necessary to fulfill the purposes identified. EFC will ask for the information it requires directly from the individual. Personal information will be collected using procedures which are fair, transparent and lawful.

You can choose to disclose as much or as little personal information as you are comfortable with. As noted in Principle 3, a decision to withhold some personal information can prevent us from providing you with our services.

#### **6. Limiting Use, Disclosure and Retention**

EFC will use your personal information only for the purposes for which it was collected.

Your information will not be disclosed without your knowledge and consent, unless permitted or required by law.

Individuals will be asked to review and approve a consent form or have the opportunity to opt out of sharing their information, before any personal information is released to third parties for the purpose of providing enhanced services or otherwise.

Your personal information will be retained only as long as necessary to fulfill the purposes for which it was collected, and in compliance with any laws surrounding information retention. If all identified purposes for the use of your personal information have been exhausted, we will destroy the information or render it unidentifiable.

#### **7. Accuracy**

In order to ensure the reliable delivery of services and information, your personal information will be kept accurate, complete and up to date.

We assume that the information that you provide to us is accurate. If at any time your personal information changes, we hope to be informed of it immediately. If you contact us with a request, we will take appropriate steps to update or correct the personal information in our possession that you have previously provided to us.

#### **8. Safeguards**

EFC employs a number of safeguards to protect your personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Such safeguards include physical measures, for example restricted access to offices, limiting access on a “need to know” basis, and use of passwords and encryption.

See **Appendix A** for a list of procedures for implementing these measures, which are communicated to all employees to ensure compliance with this principle.

#### **9. Openness**

EFC has easily understandable and readily available specific information about its policies relating to the management of personal information. Our Privacy Policy is available at all times on EFC’s website at [www.environmentfunders.ca](http://www.environmentfunders.ca), under the ‘About’ section.

#### **10. Individual Access**

Upon request, we will inform you if we hold any personal information about you and provide you with access to this information. If we have any personal information about you, we will also tell you for what purposes it is used, if applicable.

You have a right to update any personal information that we possess. Should you wish to see the full contents of your information that is on file, you must make a formal written request and mail or email it to:

Devika Shah, Executive Director  
Environment Funders Canada  
Privacy Officer  
Environment Funders Canada, 2 St. Clair Ave East, Suite 300, Toronto, ON, M4T 2T5  
Phone: (647) 288-8891 Email: [devika@environmentfunders.ca](mailto:devika@environmentfunders.ca)

We will respond to you within thirty (30) days after receipt of your written request or will notify you if a longer period is required by us in order to fully address your request, provided that an extension of thirty (30) day period is permitted by applicable privacy laws.

### **11. Challenging Compliance**

If, for any reason, you are concerned about our compliance with our Privacy Policy, you may contact our Privacy Officer in writing, by phone or by email:

Devika Shah, Executive Director  
Environment Funders Canada  
Privacy Officer  
Environment Funders Canada, 2 St. Clair Ave East, Suite 300, Toronto, ON, M4T 2T5  
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EFC has policies and procedures to receive, investigate and respond to individuals' complaints and questions.

If you are not satisfied with the way EFC has responded to a complaint, you can contact the Privacy Commissioner of Canada.

This Privacy Policy may be updated from time to time. Notice of changes to this Privacy Policy that affect you will be posted on the EFC website.

**This policy was approved by the board on April 25, 2023.**

*This Privacy Policy was developed by The Ontario Nonprofit Network. With permission from the ONN, the Board of Environment Funders has adapted this policy and approved it as a foundational document for our own organization. We are very grateful to the ONN for its leadership in developing the Privacy Policy.*

## **Appendix A - EFC Privacy Safeguards**

Environment Funders Canada uses multiple safeguards to protect personal information collected, against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification.

Current EFC safeguards:

- Encrypted file storage (Dropbox)
- Key card access to office space (Foundation House)
- Limiting file access on a “need to know” basis
- The use of passwords and use of an encrypted password document to store passwords securely