



Donor Privacy Guidelines

(Stella's Circle Community Services Inc. and Stella's Circle Foundation Inc.)

Our Commitment

Stella's Circle is committed to protecting the privacy of its donors. The organization also has a Privacy Policy specific to staff, volunteers and participants. A Privacy Committee provides guidance on privacy and confidentiality at Stella's Circle.

Stella's Circle is guided by the **Personal Information Protection and Electronic Documents Act**, which is based on the Canadian Standards Association's Model for the Protection of Personal Information, the Canadian Centre for Philanthropy's Ethical Fundraising and Financial Accountability Code and the Canada Revenue Agency.

Guiding Principles

1. Stella's Circle is accountable for your personal information

Stella's Circle is responsible for all personal donor information in our possession. Personal information is any information that serves to distinguish, identify or contact a specific individual. Information that is publicly accessible is not considered personal information (e.g. telephone directory). Stella's Circle holds donor's personal information in strict confidence.

2. We collect, use and disclose personal information only for certain purposes that we identify to you.

Stella's Circle captures, uses or discloses personal information from donors to:

- administer your donation;
- respond to your information requests;
- understand its donor base profile;
- send you literature about Stella's Circle programs (unless you indicate you do not want to receive such information);
- invite you to recognition and information sessions;
- comply with any legal and/or regulatory requirements; and,
- thank you for your support.

We obtain personal information about you lawfully and fairly. Personal information is collected from you directly unless you authorize us to collect it from elsewhere.

Personal information is used only for the purpose for which it was collected. Personal information is only used for specifically identified or reasonable purposes and only authorized individuals within Stella's Circle who have valid reasons have access to that

personal information. All staff are required to sign a privacy and confidentiality statement and to abide by Stella's Circle privacy and confidentiality policies at all times.

Where we choose to have certain services provided by third party providers, such as data processing, we select the service providers carefully. We take all reasonable precautions to ensure that the service provider protects your personal information.

3. We obtain your consent

Stella's Circle collects, uses or discloses your personal information only with your permission. Your permission may be expressed orally, in writing or may be implied, and you may give it to us orally, electronically or in writing.

You will be given opportunities to opt out of receiving communication materials from us or you may choose to opt out at any time by contacting us at info@StellasCircle.ca or 709-738-8390.

4. We limit the collection of your personal information.

Stella's Circle will limit its collection of personal information to what is required for the purposes identified by us. We obtain personal information about you lawfully and fairly.

5. We limit the use, disclosure and retention of personal information.

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with your consent or as required by law. Personal information will be retained only as long as necessary for fulfillment of those purposes. When we destroy personal information, we will use safeguards to prevent unauthorized parties from gaining access to that information during the process. Stella's Circle does not trade, rent or sell any personal information to third parties.

The Stella's Circle web site contains online forms that allow visitors to make a donation. The personal and credit card information provided on these forms is used only to process these donations. Online donations to Stella's Circle is processed through a third party. The security and privacy policies of this third party are available by clicking on the third party links on the online donation form web page.

Stella's Circle keeps personal information only as long as it is required for the reasons it was collected. When your personal information is no longer required, the information is either physically destroyed or deleted.

6. Accuracy of your personal information

Stella's Circle is committed to maintaining accurate, complete and up-to-date personal information as is necessary for the purposes for which it is to be used.

To change or modify any personal information previously provided to Stella's Circle contact us at: 142 Military Road, St. John's, NL A1C 2E6 or send an email to info@StellasCircle.ca, or call us at 709-738-8390.

7. We safeguard your personal information

Your personal information is protected with security safeguards appropriate to the sensitivity of the information. Access to your personal information is restricted to authorized individuals within Stella's Circle who have valid reasons to access your personal information.

We maintain appropriate technical and organizational safeguards to protect your personal information against loss, theft, unauthorized access, disclosure, copying, use or modification. These safeguards include passwords that change on a regular basis, restriction of employee access to files on a "need to know" basis, confidentiality oaths signed by all employees, locking up personal information and never leaving it unattended, firewalls, anti-virus, strong passwords and software solutions for technical security.

We use password protocols and secure websites to protect the personal information we receive when an online donation is made. Our software is routinely updated to maximize protection of such information.

8. We will be open about our privacy practices

Stella's Circle will make readily available to you specific information about our policies and practices relating to the management of personal information. You may request a print version of our Privacy Statement by contacting Stella's Circle at 142 Military Road, St. John's, NL A1C 2E6 or send an email to info@StellasCircle.ca, or call us at 709-738-8390.

9. We allow you to access your personal information

You may ask us whether we hold any personal information about you. You can see that information and ensure that it's accurate by contacting Stella's Circle at 142 Military Road, St. John's, NL A1C 2E6 or send an email to info@StellasCircle.ca, or call us at 709-738-8390.

10. You may register a complaint

You may register a privacy-related complaint by contacting us at 142 Military Road, St. John's, NL A1C 2E6 or send an email to info@StellasCircle.ca, or call us at 709-738-8390.

We will investigate all complaints. If a complaint identifies a gap in compliance, we will take appropriate steps to remedy the situation, including changing our policies and practices if necessary.

Contacting Stella's Circle

Stella's Circle
142 Military Road
St. John's, NL
A1C 2E6
info@StellasCircle.ca
709-738-8390