



DATA PROTECTION POLICY

Our Commitment

IMPACT is committed to protecting the privacy of personal information collected from its staff, consultants, donors, beneficiaries, and all other stakeholders. We value and respect the trust placed in us to uphold the privacy of this information. We recognize that maintaining this trust requires transparency and accountability for how we treat this information.

IMPACT gathers and uses personal information when submitted online on our website or in person, during events and activities. We also gather and use personal information as part of our monitoring and evaluation system.

Defining Personal Information

Personal information is any information that can identify or be used to contact an individual, such as a name, address, email, or financial information. It can also include identifiable characteristics such as age, income, ethnic origin, their opinion, and more.

Data Crosses Borders

We acknowledge that while our headquarters are in Canada and Canadian privacy and anti-spam legislation applies, data crosses borders. We are a Canadian organization working with stakeholders globally, it is our responsibility to understand legislation developed by other jurisdictions and our responsibility to protect personal information of their citizens.

Our Data Protection Policy strives to be compliant with legislation in Canada, the European Union, the United States, and any countries in which we operate.

Non-Discriminatory Approach to Data

We believe in all citizens having equal control over their personal information irrespective of their country of origin. We take the same responsibility and care with personal information that has been provided to us across countries and stakeholders, whether in Canada or abroad.

Accountability

We are responsible for all personal information under our custody or control.

Consent

We will ensure that the knowledge and consent of the individual is obtained for the collection and use of personal information.

May 20th, 2020

Limiting Collection and Use

We will ensure that the collection of personal information will be limited to that which is necessary for the purposes identified by the organization. We will collect information by fair and lawful means. Personal information shall not be used or disclosed for purposes other than those for which it was collected.

Retention

Personal information will be retained only as long as necessary to fulfill the intended purpose. This means we will only keep personal information as long as our relationship with the individuals is ongoing, or as needed for statistical purposes. In certain cases such financial records, IMPACT must retain certain personal information as per the timelines indicated by the Canadian Revenue Agency or other legal requirements.

IMPACT will respect the request of any individual who wishes to have their personal information removed from our databases (right to be forgotten), subject to legal requirements.

Access to Data

IMPACT will respect the request of individuals and make available access to existence, use, and disclosure of their personal information. IMPACT will ensure that the personal information is accurate and complete, and will update it if requested.

Security of Information

IMPACT is committed to protecting the security of personal information. Information is retained in secure software and filing cabinets. IMPACT limits the number of people with access to personal information—and only for its intended use. We implement the following methods of security:

- physical measures such as locked filing cabinets;
- organizational measures such as limiting access on a "need to know" basis;
- technological measures such as passwords, encryption and audits.

Privacy Officer

The Communications Director has been designated as IMPACT's Privacy Officer and has the following responsibilities:

- Ensures IMPACT's Data Protection Policy and any corresponding procedures are in line with Canadian and international legislation.
- Coordinates IMPACT's Data Mapping and cyber monitoring.
- Reports to the Executive and Heads of Departments on any gaps in procedures or IT system that could lead to a data breach.
- Coordinates data protection training for staff.
- Approves e-newsletters and other promotional mailings, in line with the Anti-Spam Compliance Procedures, and maintains the integrity of the subscriber list.
- Leads response to data breach or cyber incident.

- Maintains the Data Breach and Cyber Incident Log.
- In consultation with staff members, leads a risk assessment when there is a data breach of personal information and manages reporting to regulators and individuals as needed.

Complaints Process

Any person who has a complaint about IMPACT's data protection practices, may file a complaint in writing to the Privacy Officer at info@impacttransform.org. If the person is not satisfied with the response of the Privacy Officer and the subsequent action the organization has taken, the complaint will be forwarded to the Executive Director.

Data Breach Notification

When there is a data breach of *personal information*, IMPACT undertakes a risk assessment to determine the type of data and harm to the individual. If the assessment identifies a significant risk of harm (financial and reputational), IMPACT strives to contact the individuals impacted, country regulators where the individuals are located, and any additional third parties that can provide support (such as credit card companies or banks).

When there is a data breach of *personal information*, but the risk to individuals is low—IMPACT reports the breach to country regulators only, as required by legislation.

A data breach is reported as soon as possible after being identified, and IMPACT strives to report within 72 hours at most.

Data Breach Log

IMPACT maintains a record of all data breaches and cyber incidents as part of its security incidents log on KoboToolbox. The records provide information about each incident, data affected, and resolution. The Privacy Officer is responsible for maintaining the log. Records are kept for a minimum of two years in accordance with Canadian legislation.

Privacy Policy

IMPACT's Privacy Policy is available online: <https://impacttransform.org/en/privacy-policy/> and provides details about what personal information we collect and how we use it. It also provides information about what type of information we collect about visitors to our website.

Our Privacy Policy is part of our Data Protection Policy.

Anti-Spam Compliance Procedures

IMPACT's anti-spam procedures apply to "commercial electronic messages" sent on behalf of the organization or by one of employees promoting our work or encouraging the sale of goods and/or services.

Anti-spam procedures do not apply to emails that are unsolicited about providing services, quotations, or hiring service providers. They also do not apply to emails with the primary purpose of raising funds.

Anti-spam procedures do apply to social media.

Consent

Commercial electronic messages are only sent to recipients who have provided consent.

- **Explicit Consent:** a positive indication to receive messages from IMPACT. This consent does not expire and is valid until the individual withdraws consent. Explicit consent may be provided verbally or in writing.
- **Implicit consent:** means pre-existing business relationships, disclosure of personal information (like provision of a business card). Implicit consent is valid for two years, or only six months for a simple inquiry. IMPACT is phasing out implicit consent as of May 2018.

IMPACT respects the right of individuals who do not wish to be contacted. Individuals may opt out of receiving emails from us at any time by clicking "Unsubscribe" at the bottom of any email we send.

The Privacy Officer is responsible for approving e-newsletters and other mailing in line with Anti-Spam Compliance Procedures, and ensuring the integrity of subscriber lists.