VOLUNTEER MANITOBA INC
OUR PRIVACY POLICY

BACKGROUND

We want to make sure that we comply with the new legal obligations imposed by the federal government's *Personal Information Protection and Electronic Documents Act* ("***PIPEDA***") regarding the collection, use and disclosure of personal information in commercial activities. That is why we have developed this Privacy Policy.

We want you to know what principles and guidelines we have adopted for the collection, use, disclosure and retention of personal information. We have adopted as the foundation of our Privacy Policy the 10 Principles that are set out in the National Standard of Canada entitled "*Model Code for the Protection of Personal Information*" and that form part of PIPEDA by being attached as Schedule 1 to PIPEDA. Our objective is to promote responsible and transparent personal information management practices.

Against this background, the following principles guide us in the collection, use, disclosure and retention of personal information. However, privacy law can be expected to evolve in Canada as the Office of the Privacy Commissioner and the courts provide guidance as to the application of PIPEDA to specific fact situations. PIPEDA may itself be amended, and provincial privacy laws are expected to be enacted. Accordingly, since we regularly review all of our policies and procedures we may change our Privacy Policy at any time or from time to time.

SCOPE AND APPLICATION

The scope and application of our Privacy Policy is as follows:

1. The 10 Principles that form the basis of our Privacy Policy are interrelated, and we will strive to adhere to them as a whole.

2. Our Privacy Policy applies to *personal* information about our constituents, donors, sponsors, volunteers and other stakeholders that we collect, use or disclose in the course of commercial activities.

3. Our Privacy Policy applies to the *management* of personal information in any form, whether written, oral or electronic.

4. Our Privacy Policy does *not* impose any limits on our collection, use or disclosure of any of the following information:

    (a) an individual's name, address and telephone number that appears in a telephone directory that is available to the public, where the individual can refuse to have their personal information appear in such a directory;

    (b) an employee's name, title, business address or telephone number; or

(c) other information about an individual that is publicly available or that is specified by regulation pursuant to PIPEDA.

5. The application of our Privacy Policy is subject to the requirements and provisions of PIPEDA, the regulations enacted thereunder and any other applicable legislation, regulation, court order or other lawful authority.

GOVERNING PRINCIPLES

Principle 1 – Accountability

We are responsible for personal information in our possession or under our control.

1.1 Responsibility for compliance with the provisions of our Privacy Policy rests with our Privacy Officer, who can be reached by using the contact information at the end of this Privacy Policy. Other individuals within our organization may be delegated to act on behalf of our Privacy Officer or to take responsibility for the day-to-day collection and processing of personal information.

1.2 We will implement policies and procedures to give effect to our Privacy Policy, including:

(a) implementing procedures to protect personal information and to oversee our compliance with our Privacy Policy;
(b) developing information materials to explain our policies and procedures;
(c) training our employees, contractors and volunteers about our policies and procedures; and
(d) establishing procedures to receive and respond to inquiries or complaints.

Principle 2 - Identifying Purposes for Collection of Personal Information

We will strive to identify the purposes for which personal information is collected at or before the time the information is collected.

2.1 We collect personal information only for the following purposes:

(a) to identify our constituents, donors, sponsors, volunteers and other stakeholders;
(b) to establish and maintain responsible relationships with our constituents, donors, sponsors, volunteers and other stakeholders;
(c) to understand, develop and/or enhance the needs, desires, concerns or opinions of our constituents, donors, sponsors, volunteers and other stakeholders;
(d) to provide products and/or services and carry out organizational activities, all with a view to advancing the goals of our Mission Statement;
(e) to manage and develop our business and operations; and
(f) to meet legal and regulatory requirements.

2.2 When personal information that has been collected is to be used or disclosed for a purpose not previously identified, the new purpose will be identified prior to use. Unless the new purpose is permitted or required by law, consent will be required before the personal information will be used or disclosed for the new purpose.

Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of an individual are required for the collection, use or disclosure of personal information, except where inappropriate.

3.1 In obtaining consent, we will use reasonable efforts to ensure that an individual is advised of the identified purposes for which personal information is being collected and will be used or disclosed. Purposes will be stated in a manner that can be reasonably understood by that individual.

3.2 Generally, we will seek consent to use and disclose personal information at the same time as we collect the information. However, we may seek consent to use and disclose personal information after it has been collected, but before it is used or disclosed for a new purpose.

3.3 In determining the appropriate form of consent, we will take into account the sensitivity of the personal information and the reasonable expectations of the individual to whom the personal information relates.

3.4 An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Individuals may contact us for more information regarding the implications of withdrawing consent.

3.5 In certain circumstances, personal information can be collected, used or disclosed without the knowledge and consent of the individual. For example:

(a) if it is clearly in the interests of the individual and consent cannot be obtained in a timely way, such as when the individual is seriously ill or mentally incapacitated;
(b) if seeking the consent of the individual might defeat the purpose for collecting the information, such as in the investigation of a breach of an agreement or a contravention of a federal or provincial law, or that of a foreign jurisdiction;
(c) if there is an emergency where the life, health or security of an individual is threatened; or
(d) if disclosure is to a lawyer representing us, to comply with a subpoena, warrant or other court order, or is otherwise required or authorized by law.

Principle 4 - Limiting Collection of Personal Information

We will limit the collection of personal information to that which is necessary for the purposes that we have identified. We will collect personal information by fair and lawful means.

4.1 Generally, we will collect personal information from the individual to whom it relates.

4.2 We may also collect personal information from other sources including employers or personal references, or other third parties who represent that they have the right to disclose the information.

Principle 5 - Limiting Use, Disclosure, and Retention of Personal Information

We will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law. We will retain personal information only as long as necessary for the fulfillment of the purposes for which it was collected.

5.1 We may disclose an individual's personal information to:

(a) a third party that is involved in supplying that individual with our products or services or in otherwise carrying out our organizational activities;
(b) a third party that we have engaged to perform functions on our behalf, such as direct mail processing;
(c) a person who, in our reasonable judgment, is seeking the information as an agent of that individual. For example, we may provide information about an individual's donations or sponsorships to that individual's legal, accounting or financial advisors if we are satisfied that an advisor is requesting the information on behalf of that individual;
(d) a public authority or agent of a public authority if, in our reasonable judgment, it appears that there is imminent danger to life or property which could be avoided or minimized by the disclosure of the information;
(e) a third party that is affiliated with or otherwise related to or part of our organizational group;
(f) a third party where that individual has consented to such disclosure;
(g) a third party with whom we are negotiating for the purpose of them taking over some or all of our product and/or service offerings and/or other organizational activities; and
(h) a third party where such disclosure is required or permitted by law.

5.2 Only our employees, contractors, directors and volunteers with a business need to know, or whose duties or services reasonably so require, are granted access to personal information about our constituents, donors, sponsors, volunteers and other stakeholders.

5.3 We will keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where personal information has been used to make a decision about an individual, we will retain, for a period of time that is reasonably sufficient to allow for access by that individual, either the actual information or the rationale for making the decision.

5.4 We will maintain reasonable and systematic controls, schedules and practices for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information will be destroyed, erased or made anonymous.

5.5 All donors and sponsors will be recognized for their donations, sponsorships or other gifts in accordance with our Donor/Sponsor Recognition Policy unless a particular donor/sponsor wishes to remain anonymous.

Principle 6 - Accuracy of Personal Information

Personal information will be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

6.1 Personal information used by us will be sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about an individual.

6.2 We will update personal information about an individual as necessary to fulfill the identified purposes or upon notification by that individual.

Principle 7 - Security Safeguards

We will protect personal information through the use of security safeguards appropriate to the sensitivity of the information.

7.1 We will use appropriate security measures to protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, regardless of the format in which it is held.

7.2 We will protect personal information disclosed to third parties by contractual or other means stipulating the purposes for which it is to be used and the necessity to provide a comparable level of protection.

Principle 8 - Openness Concerning Policies and Procedures

We will make readily available to our constituents, donors, sponsors, volunteers and other stakeholders specific information about our policies and procedures relating to our management of personal information.

Principle 9 - Access to Personal Information

We will inform an individual of the existence, use and disclosure of his or her personal information upon request, and will give the individual access to that information. An individual will be able to challenge the accuracy and completeness of the information and request to have it amended as appropriate.

9.1 Upon request, we will provide a constituent, donor, sponsor, volunteer or other stakeholder with a reasonable opportunity to review the personal information in the individual's file. Personal information will be provided in an understandable form within a reasonable time and at minimal or no cost to the individual.

9.2 In certain situations we may not be able to provide access to all of the personal information we hold about an individual. In such a case, we will provide the reasons for denying access upon request. For example:

(a) if doing so would likely reveal personal information about another individual or could reasonably be expected to threaten the life or security of another individual;
(b) if doing so would reveal any of our confidential information;
(c) if the information is protected by solicitor-client privilege;
(d) if the information was generated in the course of a formal dispute resolution process; or
(e) if the information was collected in relation to the investigation of a breach of an agreement or a contravention of a federal or provincial law, or that of a foreign jurisdiction.

9.3 Upon request, we will provide an account of the use and disclosure of personal information and, where reasonably possible, will state the source of the information. In providing an account of disclosure, we will provide a list of organizations to which we may have disclosed personal information about the individual when it is not possible to provide an actual list.

9.4 In order to safeguard personal information, an individual may be required to provide sufficient identification information to permit us to account for the existence, use and disclosure of personal information and to authorize access to a particular file. Any such information will be used only for this purpose.

9.5 We will promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or

completeness will be noted in the individual's file. Where appropriate, we will transmit to third parties having access to the personal information in question any amended information or the existence of any unresolved differences.

9.6 Individuals can obtain information or seek access to their personal information by contacting our Privacy Officer during our office hours.

Principle 10 - Challenging Compliance

An individual will be able to address a challenge concerning compliance with the above principles to our Privacy Officer.

10.1 We will maintain procedures for addressing and responding to all inquiries or complaints from any constituent, donor, sponsor, volunteer or other stakeholder about our handling of personal information.

10.2 We will inform our constituents, donors, sponsors, volunteers and other stakeholders about the existence of these procedures as well as the availability of complaint procedures.

10.3 Our Privacy Officer may seek external advice where appropriate before providing a final response to individual complaints.

10.4 We will investigate all complaints concerning compliance with our Privacy Policy. If a complaint is found to be justified, we will take appropriate measures to resolve the complaint including, if necessary, amending our policies and procedures. An individual will be informed of the outcome of the investigation regarding his or her complaint.

ADDITIONAL INFORMATION

For more information regarding our Privacy Policy, please contact our Privacy Officer (Alanna H. F. Palmer), by:

1. telephone: (204) 477-5180 ext 234

2. mail: Suite 410 - 5 Donald Street South
Winnipeg, MB R3L 2T4

3. e-mail: vmcontact@mts.net

For a copy of PIPEDA or to contact the Privacy Commissioner of Canada, please visit the Office of the Privacy Commissioner of Canada's web site at: www.privcom.gc.ca