
PRIVACY POLICY

This Privacy Policy sets forth the online data collection, usage policies and practices that apply to the (A.C.C.E.S.) Accessible Community Counselling and Employment Service (“**ACCES**” or “**we**” or “**our**”), its website (the “**Site**”) and e-ACCES Online Platform (the “**Online Platform**”) available on our Site which is owned or controlled by ACCES. Each time you visit the Site and/or the Online Platform or provide us with Personal Information, you are, by doing so, accepting the terms and practices described in this Privacy Policy. You agree that by using ACCES you are expressly and affirmatively consenting to ACCES’ use and disclosure of the Personal Information that you provide as described below in this Privacy Policy. “**Personal Information**” refers to information about you that is personally identifiable and that is not otherwise publicly available, like your name, address, email address or phone number.

1. Scope of the Privacy Policy

This Privacy Policy applies to Personal Information that we collect or use through the Site and/or the Online Platform.

ACCES is not responsible for the privacy policies or practices of ad networks and other third party websites linked to the Site or the Online Platform or those who gain unauthorized access to your Personal Information from our Site and/or the Online Platform. We encourage you to carefully read the privacy policies of third party websites that you link in through our Site.

2. Information we collect

We collect Personal Information about you when you use the Site and/or the Online Platform. We collect Personal Information directly from you such as your name, address, contact email and telephone number, employment history, country of origin, and immigration status.

We may also collect the following Personal Information in relation to fundraising and donations in support of the employment and other services that we provide:

- Donation information such as date of gift, amount of gift, the campaign you contributed to, and name of your spouse or partner if it was a joint gift;
- Financial information such as your payment methods and preferences, billing and banking information including credit card number and expiry date or chequing account transit numbers. Online financial transactions, such as donations and event registrations, are processed using secure web transactions;

We also automatically collect anonymous, non-personal information about your use and interaction with the Site and/or the Online Platform, including demographic information, and information about computer or mobile device used.

3. How we use information

We use the Personal Information we collect about you to deliver the services we offer, respond to you, and operate and improve our Site and/or the Online Platform. Our services include informational and service-related communications related to employment and fundraising to support our services.

Following are the limited purposes for which we may use the Personal Information that we collect from you with regards to our services, the Site and/or the Online Platform:

- To respond to requests for services and information;
- To inform you about activities, our services, special events, and volunteer opportunities;
- To assist in developing new programs, events, and services;
- To allow users to create and register for the Online Platform and manage their registration on the Online Platform;
- For internal research purposes;
- To provide client support and help;
- For public education purposes;
- For advocacy purposes;
- To provide newsletters, emails, information and updates.

We may also use Personal Information that we receive from you in relation to our fundraising and donation activities as follows:

- To fundraise;
- To process donations and issue tax receipts;
- To administer pre-authorized recurring donations;
- To provide donation recipients with summary or aggregate information about our donations, programs and services;
- To develop advertising based on donor preferences;

Personal Information you share in public areas of the Site and/or the Online Platform or make visible in the Online Platform may be accessed, used, and stored by others around the world. We strive to provide a safe environment by attempting to limit access to our database to legitimate users, but we cannot guarantee that unauthorized parties will not gain access.

4. How we share information

We do not sell, rent or otherwise disclose Personal Information collected by our Site to third parties in the ordinary course of business for their direct marketing purposes.

We share your Personal Information with third parties who help us deliver our services to you. These third parties may not use your Personal Information for any other purpose.

5. Accountability

The collection or transfer of Personal Information is the responsibility of ACCES. Accountability for ACCES' policies to protect Personal Information rests with the Board of Directors. Responsibility for operationalizing these policies rests with ACCES' Privacy Officer.

- ACCES is responsible for Personal Information in our custody or under our control and we have designated a Privacy Officer who is accountable for ACCES' compliance with the applicable privacy laws. There are other individuals within ACCES who are responsible for the day to day collection and management of Personal Information.
- ACCES has policies and procedures in place to implement and comply with this Privacy Policy, including procedures relating to the collection, handling, disclosure, storage and destruction of Personal Information.
- ACCES is responsible for Personal Information transferred by us to, or accessed by, third parties, if any, for processing on our behalf.
- ACCES uses contractual means to provide an appropriate level of protection for such transferred information. Third parties entering into a business relationship with ACCES are required to adhere to the Privacy Policy, the applicable privacy laws and any other applicable law dealing with the protection of Personal Information.

At any time an individual wishes to withdraw their consent to the collection, use or disclosure of Personal Information, a telephone call to the head office of ACCES and/or an email to our Privacy Officer of this decision will be sufficient to remove Personal Information from the database. On a best effort basis, this action shall be taken within a guideline of 15 days of receiving a request and will be confirmed with a letter advising of the removal of the requested Personal Information. Our Privacy Officer's contact information can be found at the end of this Policy.

6. Limiting Collection

ACCES limits the collection of Personal Information to that which is reasonably necessary for the identified purpose. The types of Personal Information ACCES collects can be summarized as follows:

- a. **Personal Information provided to ACCES:** ACCES collects certain Personal Information directly from individuals who interact with our Site and/or our Online Platform or otherwise directly from you in relation to our services and/or fundraising and donation activities.
- b. **Non-Personal Information:** ACCES may automatically collect information from your browser or device when you use the Site, such as the frequency and duration of your visits to the Site, and the type of device you are visiting from. Websites use cookies and other tracking tools for a variety of reasons, including to improve the user's website experience. None of these statistics reveal any personally-identifiable or individual information and ACCES does not use any of this information to identify individuals.
- c. **Cookie-based Information:** When our users, donors, volunteers, and other constituents access the Site and/or the Online Platform, a small text file called a "cookie" is sent from our web server to their web browser and is stored on their computer. Cookies allow us to recognize users while he or she is logged into the ACCES website. Cookies expire when the browser window is closed. Session cookies employed by ACCES are strictly used to perform the function that the user intended, such as keeping the user logged into the service in a secure fashion and processing transactions. Some browsers can be set to reject all cookies. If you choose to modify your browser in this manner, some pages of the Site and/or the Online Platform may not function properly.

7. Limiting Use, Disclosure and Retention

Only that Personal Information which has been acknowledged as required for operational purposes will be collected by ACCES.

- Our Privacy Officer is responsible for ensuring that the collection of Personal Information is limited to what is required for each specified purpose.
- ACCES is committed to receiving and storing only that Personal Information which is voluntarily supplied by the individual owning the Personal Information with their full knowledge and consent of the purpose for which it is being supplied.
- ACCES' Privacy Officer will undertake to have a review of all Personal Information collected throughout the Site and/or the Online Platform, based on

the Personal Information determined to be required for the identified purposes. This review will be conducted on an annual basis, at a minimum.

- Where Personal Information has been collected that is no longer required to fulfill its specified purpose, the Personal Information will be rendered anonymous, deleted, or destroyed in a secure, non-reversible way in order to prevent further access or use of the information.
- Records confirming the destruction, deletion or alteration of Personal Information are maintained in the offices of the Privacy Officer in an effort to ensure accurate response to any inquiries or access requests about Personal Information that may have been rendered anonymous, deleted or destroyed and the date upon which this might have occurred.

8. Accuracy

Personal Information must be as accurate, complete, and up-to-date as possible in order to properly satisfy the purposes for which it is to be used.

9. Safeguards

All means possible are used to protect and safeguard Personal Information on file with ACCES.

- ACCES' Privacy Officer annually reviews the safeguards in use within the organization and its affiliates to physically protect Personal Information in paper and electronic form.
- ACCES maintains standards for ensuring the privacy of Personal Information through physical safeguards. At staff meetings, employees are reminded about the need to protect the confidentiality of Personal Information.
- In collaboration with ACCES' Privacy Officer, other senior management team members will assign access to information rights, based on their staff's need to know Personal Information to perform their functions at ACCES. A listing of which staff has access to what information, electronic or paper, is maintained by the Privacy Officer and updated quarterly.

10. Openness

ACCES makes information about our policies and practices related to the management of Personal Information readily available to users of our services and the general public. Our Privacy Policy, which informs users of the type of Personal Information we collect, what it is used for, and to whom the Personal Information may be disclosed, is posted on our website. Additional information about our

privacy policies and practices can be obtained from our Privacy Officer as described herein.

11. Individual Access

At any time, individuals are entitled to view their Personal Information on file with ACCES. Individuals who wish to review the Personal Information ACCES retains on them may do so at any time. By contacting ACCES' Privacy Officer at the Toronto Office, access to the personal file will be granted within 15 days of receiving the individuals' written request.

In consideration of workload responsibilities, the Privacy Officer may delegate to the Manager accountable for retaining this information, to be present at the time of viewing the file.

In responding to a formal written access request, a standard and through process will be undertaken to uphold the ACCES privacy principles in this Privacy Policy.

Requests for Personal Information can be directed to the Privacy Officer at the contact information found at the end of this Policy. ACCES will make every effort to respond to requests for access to Personal Information in a reasonable and timely manner.

12. Challenging Compliance

The goal of ACCES is to be the agency of choice in providing services to individuals requiring assistance with assimilation into the workforce and community at large and as such ACCES is very committed to transparency and openness.

ACCES assures each individual that our Privacy Officer will acknowledge the receipt of a complaint or a concern within 3 days of receiving such.

If further investigation is required, our Privacy Officer will investigate and communicate with the complainant within the standard of 15 days. The communication will, where warranted, indicate corrective action taken.

Individuals who are not satisfied with the responses of ACCES have the right, and are encouraged, to contact the Office of the Privacy Commissioner directly.

13. Contact Our Privacy Officer

Should you have any questions or concerns regarding the privacy of your Personal Information or our Privacy Policy, please contact our Privacy Officer at:

E-mail: yarad@acesemployment.ca

Mail: 100-489 College Street, Toronto, ON M6G 1A5