



## **Privacy Policy**

### **PURPOSE**

Protecting the privacy and confidentiality of Personal Information is an important aspect of the way that the Humane Society of Oakville, Milton & Halton (HSOMH) conducts its business. Collecting, using, and disclosing Personal Information in an appropriate, responsible, and ethical manner is fundamental to the HSOMH's daily operations. Everyone has the right to access, correct and update their own information at any time.

### **SCOPE**

The HSOMH strives to protect and respect personal non-public information of its donors, customers, employees, members, volunteers, and business partners in accordance with all applicable federal and provincial privacy legislation. This Privacy Policy informs everyone of the HSOMH's commitment to privacy and establishes the methods by which privacy is ensured. Privacy principles are applied to guide the organization in the collection, use, retention, and disclosure of Personal Information across the HSOMH. This Privacy Policy applies to all Personal Information within the HSOMH's possession and control.

This Policy is updated as needed to ensure awareness of updates to the organization's privacy practices and as the result of changes to privacy legislation. The HSOMH website will be updated with any necessary updates to this Policy.

#### **Defining Personal Information**

Personal Information is defined as any information about an identifiable individual or group, and may include but is not limited to name, address, phone number, e-mail address, gender, personnel files, driver's license numbers, credit card numbers, bank account numbers, IP address, payment records, animal and veterinary information, opinions, and personal views.

### **PROCEDURE**

#### **Limiting Collection and Identifying Purpose**

The HSOMH collects and uses Personal Information solely for the purpose of conducting business and developing an understanding of its donors, customers, members, and business partner's needs. The HSOMH asserts that Personal Information will only be collected and used for those purposes presented in this policy.





If you engage with us for adoption, animal surrender, license purchase, lost pet recovery, microchip clinics, as a donor, apply for a job or volunteer opportunity or otherwise engage with us for services we offer, we may collect information from you in several different ways, like through online and paper forms, in person, through social media or by other means.

Information we collect may include:

- Your name, address, phone number, e-mail address so that we can communicate with you.
- Your credit card information to process payments.
- Records of correspondence with us to train our staff, improve our processes and services, and address any complaints.
- Your animal and veterinary information and your opinions and personal views to determine eligibility for our services or positions or to provide you with the services agreed upon.

We may also collect information about how you use our website (through cookies) which could include details of your visits such as pages viewed and the resources that you access. Such information includes IP address, how you interact with the website, location data and other communication data to allow us to understand how you use our website and to improve your experience with us. While IP addresses will be logged to administer the site, track visitor movement, and gather demographic information, these IP addresses will not be linked to any personally identifiable information.

Our website may contain links to other sites. If you choose to visit websites outside of the HSOMH, we are not responsible for the privacy practices of these other organizations. You should review the privacy policies of these websites when visiting them.

We may contact you with information and updates on our work, products, services and how you can support us. Depending on your preferences, this may be by letter mail, email, or telephone. We will also continue to ask about your marketing preferences, to ensure that you are still happy to be contacted by us and by what means.

#### **Consent to Collection, Use and Disclosure of Personal Information**

Consent occurs and is considered given when you engage with us in any way and provide us with personal information or sign an application or other form containing your Personal Information. Consent may be received in person, by mail, by phone, by facsimile, via the internet or by other means, thereby authorizing the HSOMH to collect, use, and disclose your Personal Information for the purposes stated at the time of collection, on the form or as





indicated in the *Limiting Use, Disclosure, and Retention of your Personal Information* section of this policy. This includes consent for the OMHS to obtain or verify information from third parties (such as banks, credit bureaus, lenders, or insurance companies) in the process of assessing the eligibility of an individual, customer, client, job applicant, volunteer, or business partner.

The HSOMH is legally obligated to pursue the licensing of all dogs in Oakville that come to the attention of the Society as being unlicensed.

If the purpose for which your information was collected changes in a material way, the OMHS will notify you and collect your consent prior to using your personal information for the new purpose.

We may use your Personal Information without your consent under particular circumstances. These situations include but are not limited to investigation of fraud or if collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province or municipal by-laws.

When you visit our website, you are given the choice to opt out of having your Personal Information used at the point where the information is gathered.

If you wish to update your privacy preferences, be added or removed from any contact lists, please email [privacyofficer@hsomh.ca](mailto:privacyofficer@hsomh.ca) with your request.

#### **Limiting Use, Disclosure, and Retention of your Personal Information**

HSOMH collects Personal Information directly from the individual to which the information belongs. Individuals are entitled to know how HSOMH uses Personal Information, and we will limit the use of any Personal Information collected only to what is needed for those stated purposes.

Under no circumstances will HSOMH sell, distribute, or otherwise disclose Personal Information or contact lists to third parties for their own use. However, limited disclosure may be required as part of HSOMH fulfilling its stated business duties and day-to-day operations. This may include consultants, suppliers, or business partners of HSOMH. We enter into contracts with these service providers that require them to comply with applicable privacy laws and our contractual terms, to the extent necessary to fulfill only the work necessary relative to HSOMH.

HSOMH may share compiled demographic information with its business partners and/or advertisers, but no Personal Information that can identify any individual person shall be disclosed.





We are under obligation by law to disclose Personal Information to adhere to the requirements of an investigation of the contravention of municipal by-laws, regional or federal legislation, under the purview of the appropriate authorities.

The HSOMH will retain Personal Information only for the duration it is needed for conducting business or as required by law. Once Personal Information is no longer required, it will be destroyed in a safe and secure manner.

### **Maintaining and Safeguarding Your Personal Information**

HSOMH protects Personal Information with appropriate safeguards in keeping with the level of sensitivity of the Personal Information. We use operational procedures such as limiting access to personal information based on job duties, data and cyber security measures like encryption, physical safeguards such as locked file cabinets, and electronic precautions like complex password requirements. HSOMH maintains Personal Information through a combination of paper and electronic files. Where required by law or disaster recovery/business continuity policies, older records may be stored in a secure, offsite location.

### **Individual Access and Openness**

If you find errors of fact with your Personal Information, please notify us as soon as possible to make the appropriate corrections. In most instances, the HSOMH will grant you access to your Personal Information upon presentation of a written request and satisfactory identification. We may not be able to provide you with access to your Personal Information where the information cannot be separated from the records of others, cannot be disclosed for reasons of security or commercial confidentiality, or is protected by legal privilege. Should the HSOMH deny your request for access to your Personal Information, we will advise in writing of the reason for such a refusal. You may then challenge the decision.

### **Addressing your Questions or Concerns**

HSOMH assumes full accountability for the Personal Information within our possession and control. We have appointed a Privacy Officer to ensure that everyone at HSOMH complies with all privacy legislation and our Privacy Policy. HSOMH will investigate and address all privacy questions and concerns where appropriate and will respond to requests for access to personal information we have about you. You may be asked for a copy of your identification to allow us to verify your identity prior to fulfilment of a request for your information on file.





Any questions, concerns or complaints regarding our privacy practices or this Privacy Policy can be addressed by contacting our Privacy Officer in writing at:

Attn: HSOMH Privacy Officer  
445 Cornwall Road  
Oakville, ON L6J 7S8  
Email: [privacyofficer@hsomh.ca](mailto:privacyofficer@hsomh.ca)

*Updated May 2022*

