



Privacy Policy

This document outlines how we collect, use, disclose, store, safeguard, retain, and dispose of personal information.

REVIEW DATE

Last reviewed and approved: December 15, 2026

SCOPE

Applies to operations in Canada and, where applicable, international activities

1. Purpose

The purpose of this Privacy Policy is to ensure that the organization handles personal information in a manner that is lawful, transparent, respectful, and consistent with applicable privacy requirements and good governance practice.

2. Scope

This policy applies to all personal information collected, used, disclosed, retained, and disposed of by the organization in connection with its operations in Canada and, where applicable, its international activities.

It applies to personal information collected from donors, supporters, beneficiaries, staff, volunteers, Board Directors, applicants, contractors, service providers, partners, website users, and other individuals who interact with the organization.

3. Definitions

For the purposes of this policy, **Personal Information** means information about an identifiable individual. Personal information may include, as applicable:

- Name, address, email address, telephone number, and contact details
- Donation history, payment details, and communication preferences
- Employment, volunteer, recruitment, or governance records
- Information connected to programs, sponsorships, or case management
- Records of correspondence, complaints, inquiries, or feedback
- Technical and website usage information associated with an individual
- Any other information protected under applicable privacy law

Note: Personal information does not generally include business contact information used solely for business communications, or information that has been anonymized so that an individual cannot reasonably be identified.

4. Accountability

The organization is responsible for personal information under its control and for maintaining policies, procedures, and safeguards appropriate to the sensitivity of that information. The organization designates responsibility for privacy oversight to an appropriate senior staff member or office, who is responsible for supporting compliance with this policy, responding to privacy inquiries, and coordinating privacy-related practices.

5. Collection of Personal Information

The organization collects personal information only for purposes that are reasonable and necessary in light of its charitable purposes, operations, legal obligations, and stakeholder relationships.

The organization may collect personal information directly when individuals:

- Make a donation or pledge
- Sign up for newsletters, campaigns, or updates
- Submit forms through the website
- Apply for employment or volunteer opportunities
- Serve on the Board or a committee
- Request assistance, support, or services
- Participate in events, campaigns, surveys, or consultations
- Communicate with the organization by email, telephone, mail, social media, or otherwise
- Use the organization's website or digital platforms

The organization limits the amount and type of personal information collected to what is reasonably required for the identified purpose.

6. Purposes for Use of Personal Information

The organization may use personal information for purposes including:

- Processing donations, issuing tax receipts, and maintaining donor records
- Communicating with donors, supporters, and stakeholders about programs, appeals, campaigns, events, and impact
- Administering recurring donations and supporter accounts
- Responding to inquiries, requests, complaints, and feedback
- Delivering programs, services, sponsorships, or beneficiary support
- Assessing needs, eligibility, applications, referrals, or program participation
- Recruiting, hiring, onboarding, managing, and supporting staff and volunteers
- Supporting governance, board administration, and organizational accountability
- Conducting planning, reporting, monitoring, evaluation, and internal analysis
- Maintaining financial, legal, regulatory, and audit records
- Protecting the security and integrity of the organization's systems, operations, and website
- Complying with legal, regulatory, contractual, and reporting obligations

The organization will not use personal information for purposes unrelated to those for which it was collected except with consent, as required or permitted by law, or where otherwise appropriate under applicable legal requirements.

7. Consent

The organization seeks consent for the collection, use, and disclosure of personal information except where otherwise permitted or required by law. The form of consent may be express or implied depending on the sensitivity of the information and reasonable expectations.

Methods of Obtaining Consent:

- In writing, verbally, or electronically
- Through online forms or event registration
- Through donor transactions

Withdrawal of Consent: Individuals may withdraw consent subject to legal, contractual, or operational restrictions and reasonable notice. Withdrawal may affect our ability to provide certain services, communications, or engagement opportunities.

8. Disclosure of Personal Information

The organization **does not sell** personal information. We may disclose information only where reasonably necessary, with consent, or as required by law. Disclosures may include:

- ✓ Employees, volunteers, & Directors requiring access for duties
- ✓ Service providers (IT, auditors, legal, payment processors)
- ✓ Implementing partners for program delivery
- ✓ Financial institutions for payment administration
- ✓ Regulators & legal authorities where required by law

Note: Where we use third-party service providers, we seek to ensure that personal information disclosed to them is protected through appropriate contractual, operational, or technical measures.

9. International Activities and Cross-Border Processing



Because the organization may work with international partners, cloud systems, or service providers, personal information may be stored, processed, or accessed outside the province or country in which it was originally collected. Where this occurs, the information may be subject to the laws of the jurisdiction in which it is processed or stored.

The organization takes reasonable steps to ensure that cross-border handling of personal information is subject to appropriate safeguards and only occurs where necessary for legitimate organizational purposes.

10. Website, Cookies, and Digital Information



The organization's website may automatically collect technical information such as:

- IP address, browser type, and device type
- Referring pages, pages visited, dates and times of access
- Other analytics and usage information

We use cookies, pixels, and analytics tools to improve functionality, understand audience engagement, support digital campaigns, and enhance user experience.

User Choice: Individuals may adjust browser settings to disable certain cookies, although doing so may affect website functionality. Note that third-party tools or platforms used by the organization may collect or process information in accordance with their own policies and terms.

11. Email, Marketing, and Communications Preferences

The organization may send updates, appeals, newsletters, event invitations, receipts, and other communications to donors, supporters, and stakeholders, subject to applicable consent and anti-spam requirements. Individuals may unsubscribe from non-essential electronic communications at any time using the unsubscribe function provided or by contacting the organization.

Operational, transactional, or legally required communications may still be sent where appropriate.

12. Beneficiary, Program, and Sensitive Information

The organization recognizes that certain program-related and beneficiary-related information may be sensitive. Where the organization collects sensitive personal information, it does so only where reasonably necessary, with appropriate consent or lawful authority, and with enhanced care regarding access, storage, disclosure, and safeguarding.

Protection of Vulnerable Individuals: Access to sensitive information is limited to those who require it for authorized purposes. The organization seeks to protect the dignity, confidentiality, and wellbeing of beneficiaries and vulnerable individuals in all its information handling practices.

13. Safeguards

The organization protects personal information using safeguards appropriate to the sensitivity of the information. We employ role-based access, administrative controls, and reasonable security measures.

- Physical measures:** Locked files, secure storage areas, and controlled office access.
- Organizational measures:** Confidentiality obligations, mandatory training, restricted role-based access, and strict policy controls.
- Technological measures:** Password protection, encryption, secure servers, multi-factor authentication, backups, and access logging.
- Contractual protections:** Binding agreements with service providers and partners handling personal information on the organization's behalf.

While no method of transmission or storage is completely secure, the organization takes reasonable steps to reduce the risk of unauthorized access, loss, misuse, disclosure, alteration, or destruction.

14. Access Limitation

Access to personal information is strictly limited to individuals who require the information to perform authorized duties on behalf of the organization.

Employees, volunteers, Board Directors, contractors, and representatives are expected to maintain confidentiality and use personal information only for legitimate organizational purposes.



Confidentiality Commitment

"Need-to-know" basis only. All personnel with access to personal data are bound by strict confidentiality agreements to protect donor and beneficiary privacy.

15. Retention and Destruction



The organization retains personal information only for as long as reasonably necessary to fulfill the purposes for which it was collected, to meet legal, accounting, tax, audit, regulatory, safeguarding, insurance, or operational requirements, and to support appropriate organizational recordkeeping.



When personal information is no longer required, it is securely destroyed, deleted, anonymized, or otherwise disposed of in a manner appropriate to the sensitivity of the information and the medium in which it is stored.

16. Accuracy

The organization seeks to keep personal information as accurate, complete, and up to date as is reasonably necessary for the purposes for which it is used.



Individuals are encouraged to notify the organization of changes to their contact details or other relevant information.

17. Access and Correction Requests



Individuals may request access to personal information about them that is in the organization's custody or control, subject to any legal exceptions or limitations. Individuals may also request correction of inaccurate or incomplete personal information.

Requests for access or correction should be submitted to the organization using the contact information identified in this policy. The organization will respond within a reasonable time and may request sufficient information to verify the identity of the requester before releasing or amending records.

18. Privacy Complaints and Questions



Individuals may contact the organization with questions, concerns, or complaints about the organization's privacy practices, this policy, or the handling of personal information. The organization will review privacy concerns in a timely and appropriate manner and take steps to address issues where warranted.

 *Access and correction are core privacy rights reflected in Canadian private-sector privacy principles.*

19. Breach Response Protocol

1

Assess

Identify nature and scope of the privacy breach.

2

Contain

Take reasonable steps to mitigate harm and secure systems.

3

Investigate

Analyze the circumstances and root cause.

4

Notify

Inform individuals and regulators where required.

5

Review

Document incident and improve controls.

20. Vulnerable Persons

We exercise additional care and safeguards when collecting or using information from children or vulnerable persons in our programs, recognizing the heightened sensitivity.

21. Third-Party Links

Our website links to external sites. We are not responsible for their privacy practices. Please review their policies before providing personal information.

22. Policy Availability

This Privacy Policy is posted in a readily accessible location on our website and is available upon request to stakeholders and the public.

23. Policy Review

Reviewed at least every five years, or earlier if required by changes in law, technology, organizational activities, or privacy risk assessments.

24. Contact Information

Questions, access requests, correction requests, or privacy complaints may be directed to the organization through the contact information published on its website and privacy page.

A designated senior privacy lead/office oversees compliance and inquiries.



Get in Touch

For mailing address, email, and phone number details, please refer to our current listings online.

www.dropletsofmercy.org

25. Review and Approval



Board of Directors Approval

This Privacy Policy was last reviewed and approved by the Board of Directors on **December 15, 2026**.

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2026.12.15