

June, 2019

Hope for Rural Children and Orphans (HORCO)

Personal Information Privacy Commitment Statement

In accordance with applicable laws, HORCO is committed to protecting the privacy of its donors, volunteers, (employees,) directors, officers and any other persons about or from whom HORCO collects personal information. HORCO embraces the principles of the Canadian Standards Association *Model Code for the Protection of Personal Information* to ensure that all personal information is properly collected, used only for the purposes for which it is collected and is disposed of in a safe and timely manner when no longer required.

Except for the above implied consent to collect, use and retain personal information, no personal information will be sold, rented, leased or otherwise made available to any person without the explicit consent of the person whose information it is. Except as otherwise required by the operation of law, every person has the right, at any time, to withdraw his or her implied or explicit consent for the use of his or her personal information for any or all previously authorized uses.

With respect to the privacy of personal information the above means that all people who have given their implied consent to use their personal information for all internal purposes of HORCO and the pronouncements of HORCO from time to time.

Other persons or organizations who act for, or on behalf of, HORCO are required to comply with the principles and the Policy and will be given restricted access to personal information solely to perform the services they may be retained to perform for HORCO.

HORCO has designated Robert Kline, to be its Privacy Officer. Any inquiry, request or concern related to privacy matters should be made in writing to him/her.

Privacy Officer Contact Information:

Address: 26-627 Wharncliffe Rd S London, Ontario N6J 2N7

Phone: 519-649-0271

Email: bob@horco.ca

Privacy Policy of HORCO

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1. Accountability

HORCO is responsible for maintaining and protecting the personal information under its control. HORCO has appointed a Privacy Officer who is responsible to ensure that HORCO complies with its privacy obligations in accordance with applicable privacy laws.

2. Identifying Purposes

HORCO collects and uses personal information for a variety of purposes including, but not limited to,

- managing payroll and benefits (not presently applicable);
- evaluating employee performance (not presently applicable);
- establishing and maintaining lists of donors.

HORCO shall identify and explain the purposes for which it collects personal information, to the person from whom the personal information is being collected, before or at the time the information is collected.

3. Consent

Consent will be obtained from the person whose personal information is collected, used and disclosed, unless obtaining the consent would be inappropriate or not required by law. Sometimes the person's consent may be implied by virtue of their support of HORCO's charitable purposes or because of the person's relationship with HORCO (e.g., volunteer). When it is appropriate, written consent will be obtained.

Written consents will be kept on file for as long as the information is reasonably necessary. A person may withdraw his or her consent at any time, subject to legal or contractual restrictions and reasonable notice. The person will be informed of reasonably foreseeable implications of the withdrawal.

4. Limiting Collection

Information collected will be limited to that required for the purpose or purposes identified by HORCO. HORCO is committed to collecting personal information in a fair, open and lawful manner.

5. Limiting Use, Disclosure and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the person or as required by law. All collected personal information shall be destroyed, erased or made anonymous as soon as the purpose for which it was collected is no longer relevant, or as permitted by the law.

6. Accuracy

Personal information shall be maintained in as accurate, complete and up-to-date a form as necessary in order to fulfill the purposes for which it was collected.

7. Safeguards

Personal information will be protected by security safeguards that are appropriate to the sensitivity of the personal information. This safeguarding could include physical measures such as locked filing cabinets and premises security, organizational measures such as restricted access to files with personal information or technological measures such as security software.

8. Openness

Information regarding the privacy policy of HORCO, as well as the personal information management, shall be available as requested. The information will include:

- Name and address of the Privacy Officer
- Means of gaining access to personal information held by HORCO
- Copy of any brochures or other information that explains HORCO's policies, standards or codes

9. Access to Personal Information

Access to personal information will be granted, where HORCO is legally required to release the information and provided that the disclosure does not violate any applicable statutes or contracts, to the person to whom the information pertains where there is an appropriate written request. The existence, use and disclosure of the personal information will be granted within a reasonable period of time. Any inaccuracy or incompleteness of personal information will be amended as required.

10. Challenging Compliance

Complaints or inquiries about the collection, use, disclosure or retention of personal information and HORCO's compliance with these ten principles should be directed to the Privacy Officer. The Privacy Officer will investigate complaints and ensure that appropriate measures are taken.

(Privacy Policy modelled after a document prepared by the Canadian Council of Christian Charities. HORCO is an Associate Member of the "4Cs".)