

**Women in Insurance Cancer Crusade
WICC Ontario Privacy Policy**

Introduction

Women in Insurance Cancer Crusade, Ontario Chapter (WICC), is an incorporated organization that collects funds and advocates for cancer research, prevention and education.

WICC endorses and abides by applicable federal and provincial laws, codes and guidelines respecting privacy.

This Privacy Policy addresses two broad issues -- how WICC collects, uses, discloses and protects personal information; and the right of Customers to have access to personal information about themselves and, if necessary, to have the personal information corrected. Ten interrelated principles form the basis of the Privacy Policy. Each principle, along with the measures adopted by WICC to ensure implementation and compliance, is discussed below.

Why we collect personal information (the Purposes).

In order to further such charitable purposes, WICC may obtain personal information about individuals in order to identify and canvas donors, solicit and collect funds, organize fund raising events, sell merchandise, answer inquiries, generate publicity and carry out other activities that are necessary to WICC's charitable activities (the Purposes). WICC is committed to protecting such personal information.

Those individuals whose personal information is collected may include potential and existing members of WICC, donors, sponsors, people who register or attend WICC events, or purchase merchandise at events, via mail or on-line. For purposes of convenience, such persons will be referred to as "Customers" of WICC. To ensure that this commitment to Customer privacy is maintained, WICC has developed a Privacy Policy which governs its Board members, employees, volunteers, representatives and suppliers with respect to the collection, verification, confidentiality, correctness, security, protection, use and disclosure of personal information.

What is "personal information"?

Personal information is information about a Customer that identifies an individual as a Customer of WICC. It can include the individual's name, address, telephone number, email address, place of employment, and credit card information.

THE TEN PRINCIPLES

1. Accountability of WICC

WICC is responsible for personal information under its control and shall designate an individual or individuals who are accountable for WICC's compliance with the Privacy Policy.

The Privacy Officer of WICC will oversee compliance with the Privacy Policy. The Privacy Officer, working with the Board of Directors of WICC, will develop and implement procedures to ensure compliance with the Privacy Policy and to protect personal information.

2. Identifying the Purpose for Collecting Personal Information

WICC will collect, use or disclose personal information only for purposes that a reasonable person would consider appropriate in the circumstances.

WICC, Ontario Chapter Privacy Policy

WICC will take appropriate steps to identify, document and communicate the purposes for which personal information is collected before or at the time of such collection. Express consent may not be obtained if the reason for such collection would be obvious to a reasonable person.

WICC will only request personal information that is necessary for the Purposes and WICC will not sell personal information to third parties without consent.

3. Consent by the Customer

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

WICC will collect, use and disclose personal information only if appropriate consent is obtained. Such consent may be express or implied.

A Customer, on reasonable notice, may withdraw a consent previously given to WICC except where such withdrawal could breach a contractual obligation which binds the Customer or where law prohibits such a withdrawal.

4. Limiting Collection of Personal Information

The collection of personal information will be limited to that which is necessary for the Purposes identified by WICC. Information will be collected by fair and lawful means.

WICC will collect only the amount and type of personal information needed for the Purposes.

5. Limiting Use, Disclosure and Retention of Personal Information

Personal information will not be used or disclosed for purposes other than those for which the information was collected, unless a Customer gives consent to use or disclose it for another reason. WICC will retain information only so long as necessary for the identified Purposes.

As noted in Section 3 above, WICC will collect, use or disclose personal information in accordance with the Purposes.

WICC will retain personal information in accordance with policies and procedures developed for such retention and in accordance with applicable legal requirements.

6. Accuracy of Customer Information Held by WICC

Personal information shall be kept as accurate, complete, up-to-date and relevant as is necessary for the Purposes for which it is to be used.

Personal information will generally be updated only if it is necessary for the purposes for which it was collected. Where personal information is used on an ongoing basis, including information that is disclosed to third parties, WICC will make reasonable efforts to keep such information accurate and current.

WICC will rely on Customers to keep certain personal information (such as name and address changes) accurate, complete and current. Prompt notification of such changes will help WICC provide the best possible service.

7. Safeguarding Personal Information

WICC will protect personal information with safeguards appropriate to the sensitivity of the information.

WICC will appropriately protect personal information from loss or theft, and from unauthorized access, disclosure, duplication, use, modification or erasure. Safeguards vary according to the sensitivity, amount, distribution, and format of the information and the method of storage. Sensitive personal information is given the highest level of protection.

WICC may allow access to personal information to third parties for sending mailings, filling product orders, providing data processing services, accounting/audit review and for other services. These third parties are required to safeguard and not use or disclose personal information as required by law.

8. Openness with Customers

WICC will make readily available to its Customers specific information about its policies and practices relating to the management of personal information.

WICC will be open with its Customers about its policies and practices respecting the management of personal information it holds or controls. Copies of this Privacy Policy are available on request from WICC's Privacy Officer, who may be contacted as set out in Section 10 below.

9. Customer Access to Personal Information

Upon written request, a Customer will be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. A Customer shall be entitled to question the accuracy and completeness of the information and have it amended as appropriate.

Upon written request to the Privacy Officer (see Section 10) and providing suitable identification, WICC will promptly advise a Customer if it holds personal information about the Customer and will if possible and appropriate, provide details of such information, including the source, provided such disclosure is not prohibited by law. If requested, WICC will assist a Customer to prepare a request under this section. If possible and appropriate, WICC will also, upon written request, advise to whom it has or may have disclosed the personal information and how and when the information was disclosed. .

WICC will respond to each request within 30 days of receipt. In certain circumstances, it may be necessary to extend the time to properly respond, in which event the Customer will be notified about, and be given reasons for, such time extension.

WICC will normally not record when personal information is disclosed to third parties for routine purposes such as:

- advising third parties when cheques are returned NSF (no sufficient funds)
- processing credit card transactions
- providing information with respect to tax receipts
- providing information usual and necessary for general accounting and audit reviews.

**WICC, Ontario Chapter
Privacy Policy**

Should incorrect or outdated information be identified, WICC will make the appropriate changes to ensure accuracy and completeness. Upon request, the Customer will be provided with a copy of the corrected information and WICC may communicate such changes to third parties who may have received incorrect information from WICC, as well as to those who may have provided incorrect information to WICC. If a Customer should disagree on the accuracy or completeness of any personal information, the Customer's opinion will be recorded in his/her file.

10. Challenging Compliance and Handling Customers' Complaints and Questions

A Customer will be able to challenge WICC's compliance with the above principles with the person or persons who are accountable for WICC's compliance.

WICC has policies and procedures to receive, investigate and respond to Customers' complaints and questions relating to privacy and the handling of personal information.

Customers can make inquiries or lodge complaints about WICC's personal information handling policies and practices. **If a Customer wishes to communicate with WICC about its privacy policies, has any questions or is not satisfied with an answer, the Customer is encouraged to contact the individual noted below.**

Privacy Officer
Women in Insurance Cancer Crusade, Ontario Chapter
157 Adelaide St. W., Suite 170
Toronto, Ontario.
M5H 4E7
Telephone: (416) 410-6383
Email: execdirector.wicc@sympatico.ca

WICC will investigate all complaints and if it finds a complaint is justified through either the internal or external complaint review process, WICC will take appropriate corrective measures.