

PRIVACY POLICY - GORDON AND MARION SMITH FOUNDATION

1. Policy Purpose and Scope

- 1.1. The Gordon and Marion Smith Foundation (the "Foundation") is committed to protecting the privacy of people whose personal information is held by the Foundation through responsible management of that information.
- 1.2. The Foundation has established this Privacy Policy to ensure that any personal information provided to the Foundation by its donors ("Donor Information") is collected, used and disclosed in accordance with the British Columbia Personal Information Protection Act ("PIPA") and other applicable legislation.
- 1.3. This Privacy Policy also applies to any service providers collecting, using and disclosing Donor Information on behalf of the Foundation.
- 1.4. Donor information does not include a donor's business contact information (name, position title, address phone number, fax or email) as this information is not covered by PIPA.

2. Collecting Donor Information

- 2.1. The Foundation collects and records Donor Information provided by donors through correspondence, conversations, meetings, conferences, donations and other forms of communications.
- 2.2. The Foundation automatically collects and stores information from visitors to its website, such as a visitor's internet protocol address and domain name used, the type of browser and operating system, the date and time of visit and the web pages accessed. This automatically collected information from visitors will only be used for website management and will not be used to determine a visitor's identity unless required by for internal investigation or law enforcement purposes. The Foundation's Privacy Policy does not apply to any websites to which links are provided on the Foundation's website. The Foundation is not responsible for the privacy practices or content of external websites.
- 2.3. Donor Information will only be used by authorized staff to fulfill the purpose for which it was originally collected or for a use consistent with that purpose unless the donor's consent is obtained.

2.4. Donor Information may be used for the purpose of assisting the Foundation in:

- 2.4.1. identifying donors
- 2.4.2. assisting a donor in making a gift to the Foundation
- 2.4.3. receipting, acknowledging and stewarding the gifts of donors
- 2.4.4. contacting donors for fundraising

This is not a complete list; the Foundation may collect Donor Information for other purposes from time to time as is considered appropriate by the Foundation's Board of Directors in order to fulfill the Foundation's objectives.

3. Donor Consent

3.1. The Foundation will obtain the donor's consent to collect, use and disclose Donor Information, except in the limited circumstances listed below.

3.2. Consent can be provided verbally or in writing or can be implied where the purpose for collecting, using or obtaining the Donor Information would be considered obvious and the donor voluntarily provides the Donor Information for that purpose.

3.3. The Foundation will not share, sell or make available a donor's Donor Information with third parties without the donor's consent unless required by the Foundation:

- 3.3.1. to process the donation
- 3.3.2. for the operation of the Foundation eg. service providers for the Foundation's fundraising events or professionals providing advice to the Foundation (who will be required to comply with this Privacy Policy)
- 3.3.3. to comply with applicable laws

4. Securing Donor Information

4.1. The Foundation is required to protect Donor Information from the risks of unauthorized access, use, collection, disclosure, copying, modification or disposal.

4.2. The Foundation has adopted security measures into its day to day operating practices to protect against such risks, including:

- 4.2.1. using locked cabinets and physically securing offices where Donor Information is kept,
 - 4.2.2. Using user ID's and passwords to restrict electronic access,
 - 4.2.3. restricting access to those needing the Donor Information for Foundation purposes.
 - 4.2.4. contractually requiring service providers to provide comparable security measures.
- 4.3. As the Foundation's objective is the creation and stewardship of an endowment fund to be kept in perpetuity for the Artists for Kids Trust, Donor Information collected from a donor may be retained permanently.
- 4.4. If a donor's Donor Information is no longer needed by the Foundation for its activities or for historical records or for business or legal reasons, the Foundation will dispose of the unneeded Donor Information responsibly, ie. by shredding documents or electronically deleting stored information.

5. Accessing Donor Information

- 5.1. Donors may review the Donor Information the Foundation has collected and recorded for that donor, but that donor only.
- 5.2. Donors may also provide written permission to the Foundation to permit another individual to review the Donor Information the Foundation has recorded for that donor, but for that donor only.
- 5.3. Donors may request correction to their Donor Information to ensure its accuracy and completeness and the Foundation will correct the Donor Information as required.

6. Questions and Concerns

- 6.1. Donors having questions or concerns about the Donor Information the Foundation collects may contact the Foundation's privacy officer at (604) 903-3797 or by fax at (604) 903-3778.