



## Privacy Policy

**Board Approval date: December 8, 2021**

**Next Review: December 2024**

### 1. Purpose

- 1.1. Rainbow Resource Centre values the trust of clients, stakeholders and donors and recognizes that maintaining this trust requires accountability in how it collects and uses personal information.
- 1.2. This policy outlines how personal information is collected, used and secured.

### 2. Definitions

- 2.1. Rainbow Resource Centre Inc. is referred to as “the Centre”.
- 2.2. “The Board” refers to the Rainbow Resource Centre Board of Directors
- 2.3. “Personal information” is any information that can be used to distinguish, identify or contact a specific individual, except business contact information that is publicly available.
- 2.4. “PHIA” refers to the Personal Health Information Act of Manitoba.
- 2.5. “FIPPA” Freedom of Information and Protection of Privacy Act of Manitoba.

### 3. Policy

- 3.1. The Centre collects personal information for the purposes of:
  - Receiving communication from the Centre
  - Completing a transaction
  - Building strong relationships
  - Meeting service expectations
  - Complying with procedures required by law
- 3.2. The Centre collects personal information:
  - Directly from individuals
  - Through our website
  - Through third-party platforms to accept donations, provide communication support and compile and analyze analytics.
- 3.3. Explicit consent is required to be obtained by lawful means from individuals at the time of collection, prior to the use or disclosure of the personal information. By providing personal information to the Centre, individuals are consenting to the use of the information for the purposes identified in this policy.
  - The Centre does not sell or trade personal information and does not “rent” out mailing lists
  - The Centre will only disclose information about an individual for whom it applies with the expressed consent of that individual, or, unless lawfully required.
  - The Centre’s website uses cookies



- 3.4. Personal information collected from counselling clients is managed in accordance with PHIA & FIPPA. Centre counsellors are regulated by professional licensing bodies and further details about privacy and confidentiality are outlined in the Centre's "Counselling Policy".
- 3.5. Individuals who participate in the optional services hosted by a third-party platform are subjected to that platforms' terms of use and privacy policy agreements. The centre is not liable for any information freely shared on these optional platforms.
- 3.6. We strive to adhere to the principals of Canadian privacy legislation.

#### **4. Procedure**

- 4.1. All Centre staff, Board and volunteers sign a Confidentiality Agreement
- 4.2. Information is stored in a controlled, secure environment, protected from unauthorized access.
- 4.3. Those who are authorized to access personal information only do so based on their need to deal with the information for the reason(s) it was obtained.
- 4.4. The Centre uses password protocols and encryption to protect personal information that is received and/or provided through the internet.
- 4.5. Stakeholders have the right to request a copy of or change their personal information.

#### **5. References**

- 5.1. Confidentiality Agreement
- 5.2. Counselling Policy
- 5.3. Appendix—website version

#### **6. Revision/Review**

- 6.1. This policy may be amended only by Board resolution.
- 6.2. This policy will be reviewed every 3 years by the Governance Committee.