# Last Reviewed & Updated: September 1, 2023

Covered under the Personal information Protection and Electronic Documents Act (PIPEDA), the Concussion Legacy Foundation Canada is regulated under this federal legislation, in terms of the collection, storage and trading of donors' personal information with any and all other organizations.

The Concussion Legacy Foundation Canada will conduct itself, in all areas of ongoing business in a manner which will protect all personal information collected, stored and used in its business activities in a manner consistent with the mandate of PIPEDA.

The Concussion Legacy Foundation Canada complies with Canada's Anti-Spam Legislation (CASL) which limits on-line commercial messages.

The Concussion Legacy Foundation Canada complies with Quebec Law 25, which enforces enhanced data protection and privacy for Quebec Residents.

### **Privacy Policy**

# **Protection of personal information**

As a Registered Charity in Canada, we will maintain your right to privacy. When you share with us your personal information, contact us in any way – whether through the mail, via the telephone, connecting to our web site, supporting our organization through donations, being a part of our volunteer base, or engaging in any of our programs, our commitment is to the protection of your personal information and your right to privacy. 

The Concussion Legacy Foundation Canada has developed a plan in compliance with the National Standard of Canada covered within applicable legislation, based on the 10 Privacy Principles contained within the Canadian Standards Association Model Code for the Projection of Personal information.

The collection or transfer of your personal information is our responsibility when it is obtained by the Concussion Legacy Foundation Canada. We accept this responsibility whenever we, or an agency on our behalf, handles your personal information. Dur plan to secure your personal information from disclosure includes the appointment of a senior staff being assigned the responsibility for compliance to PIPEDA and Law 25. We will, under this plan audit and maintain our privacy policy, our information systems and train all personnel accordingly. At any time, anyone having personal information in our possession may, according to our procedures, request and gain access to their own information for purposes of review.

### Identification of purposes of collection of information

We will identify the purpose for the collection of personal information, at or before the time the information is collected. The Concussion Legacy Foundation Canada methods of collection can include:

- Telephone/email
- Employment application forms
- Correspondence
- Public surveys
- Donations
- Registrations
- Program engagements

# Knowledge and consent

We will never collect your personal information without your knowledge and prior consent. The knowledge and consent of the individual are required for the collection, use, and/or disclosure of personal information. The Concussion Legacy Foundation Canada utilizes express consent wherever possible, and in all cases, when the personal information is considered sensitive.

Subject to legal requirements, the Concussion Legacy Foundation Canada understands and will comply with your right to withdraw your consent to the collection, use or disclosure of personal information at any time.

# Limiting the collection of information

Only that personal information which we have acknowledged as required for operational purposes will be collected by our organization. The Concussion Legacy Foundation Canada collects personal information through the ongoing activities of its programs and projects. The Concussion Legacy Foundation Canada will limit its collection to information that is necessary for purposes it identifies or that are obvious in the circumstance. The Concussion Legacy Foundation Canada will collect the information in a manner that does not coerce or deceive the individual.

### Limiting use, disclosure and retention of collected information

Personal information will be retained as long as it is required to satisfy the intended purpose, and in compliance with any laws surrounding information retention. If all identified purposes for the use of personal information collected have been exhausted, we will destroy the information or render it unidentifiable to any specific person. It does not rent, sell or trade its mailing or other member lists.

All purposes for which we intend to use your personal information will be disclosed to you and should we identify a new situation requiring the use of your information, we will contact you prior to information being used with a view to gaining your consent.

# **Accuracy of your personal information**

The Concussion Legacy Foundation makes every effort to ensure that the personal information in its custody or control is accurate, complete and up-to-date for the purposes for which it will be used or disclosed.

## Safeguards for your personal information

All means possible are used to protect and guard personal information on file with the Concussion Legacy Foundation Canada. Access to information is limited to those with a "need to know", all employees and volunteers in the employ of the Concussion Legacy Foundation Canada and the Concussion Legacy Foundation are trained on the issue of privacy – its meaning and importance, and as well, all files whether "soft" (meaning electronic) or "hard" (meaning paper) are maintained in locked filing cabinets in secure locations. Our Executive Director will screen and verify access to personal information.

The Concussion Legacy Foundation Canada works closely with our global chapters in the United States, Australia, and UK. In order to provide the best services and programs possible, the Concussion Legacy Foundation Canada collaborates with our global chapters when possible. In these instances, data may be shared with employees overseeing and operating these programs. All programs offered under the Patient and Caregiver Services umbrella (CLF HelpLine, Mentorship, Support Groups) are operated collaboratively between the Canadian and United States entities. As such, program directors, managers, and coordinators will have access to personal information on an as needed basis to service requests and operate programs.

To reinforce a culture of privacy protection, Concussion Legacy Foundation Canada and Concussion Legacy Foundation staff and volunteers are required to sign a confidentiality agreement as a requirement of employment or volunteerism. Any material which contains personal or confidential information will be destroyed in accordance with industry standards prior to its disposal.

### Cookies & web beacons

The Concussion Legacy Foundation Canada uses Google's Analytics tool as a third-party tool to collect geographic, device, and anonymous user data to identify areas of improvement for the website and as a tool for future development. This data is based on IP addresses and does not include any personal information such as names, emails, phone numbers, or mailing addresses.

As of August 2023, the Concussion Legacy Foundation Canada has integrated Google signals, which are session data from sites and apps that Google associates with users who have signed in to their Google accounts, and who have turned on Ads Personalization. This is done through the use of cookies. Cookies are small data files that are served by our platform and stored on your device.

You can refuse consent to, customize, or <u>opt-out of the use of Google Analytics via this Opt-Out browser add-on by Google</u>.

## Openness of our privacy policy and procedures

At the Concussion Legacy Foundation Canada, transparency is of the utmost importance. Our policies and procedures are documented and open to all individuals. We will endeavour to communicate our Privacy Policy and Procedures, to the best of our ability, to all those individuals providing us with their personal information.

# Right to access personal information

At any time, you are entitled to view your personal information on file with the Concussion Legacy Foundation Canada. Upon receiving a request from you, we will advise you of the purpose for which it was collected, the disposition of the information and, if it has been disposed, how we did this.

In order to access your any personal information, we may have on you, please send your written request to the Concussion Legacy Foundation Canada's Executive Director at 4 Parkman Place, Westmount QC, H3Y 2L5. We will only allow access to personal information we have on file for that person who is requesting access upon receipt of this written request.

# Your right to challenge

We are very committed to transparency and openness. Our Executive Director can be contacted at any time should you be concerned about our not complying with our stated Privacy Policy. Your comments are always appreciated in our endeavour towards continuous improvement.

Executive Director Email: info@concussionfoundation.ca