



**Little  
Brothers** Embracing  
the Elderly

# PRIVACY POLICY

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*ADOPTED* BY THE CORPORATION'S BOARD OF DIRECTORS ON OCTOBER 2, 2023

This policy is also available in French. In the event of a dispute regarding interpretation, the French version shall prevail.

**TABLE OF CONTENTS**

- 1. OVERVIEW ..... 3**
  - 1.1 PREAMBLE ..... 3
  - 1.2 OBJECTIVE..... 3
  - 1.3 SCOPE ..... 3
  - 1.4 DEFINITIONS..... 3
    - 1.4.1 *Personal information* ..... 3
    - 1.4.2 *Tacit or explicit consent* ..... 4
- 2. GUIDING PRINCIPLES ..... 4**
  - 2.1 ACCOUNTABILITY ..... **ERREUR ! SIGNET NON DEFINI.**
  - 2.2 IDENTIFYING PURPOSES FOR COLLECTING INFORMATION ..... 4
  - 2.3 CONSENT ..... 5
  - 2.4 USE AND DISCLOSURE ..... 5
  - 2.5 STORAGE ..... 5
  - 2.6 SECURITY MEASURES ..... 6
  - 2.7 TRANSPARENCY AND ACCESS TO PERSONAL INFORMATION ..... 6
  - 2.8 LODGING A COMPLAINT ABOUT NON-COMPLIANCE WITH THE PRINCIPLES ..... 6
  - 2.9 COOKIES ..... 7
- 3. RESPONSIBILITIES ..... 7**
  - 3.1 BOARD OF DIRECTORS ..... 7
  - 3.2 HUMAN RESOURCES AND INTERNAL COMMUNICATIONS COMMITTEE ..... 7
  - 3.3 GENERAL MANAGEMENT ..... 7
- 4. TABLE OF MODIFICATIONS ..... 7**
- APPENDIX 1 – TABLE OF INFORMATION COLLECTED ..... 9**
- APPENDIX 2 – TABLE OF FILE RETENTION PERIODS ..... 9**
- APPENDIX 3 – ACCESS TO DIGITAL PERSONAL INFORMATION..... 11**



## 1. OVERVIEW

### 1.1 PREAMBLE

The individuals' right to protect their personal information must be balanced with Little Brothers' legitimate need to collect, use and disclose this information for reasonable purposes related to screening and diligent monitoring of activities. The very nature of Little Brothers' activities, such as elder support, volunteering and fundraising, involves the collection, use, disclosure and retention of sensitive, personal information.

Access to information and privacy legislation, including the Private Sector Privacy Act, contains provisions to the effect that organizations must protect personal information in their possession. Not only is such protection important for individuals whose personal information is at stake, it is also important for organizations that may be held accountable or have their reputations tarnished as a result of improper access, use, retention or disclosure of personal information.

In addition to requirements for protection, the law may also give individuals the right to consult their own information, in full or in part. These individuals may also request the correction or modification of any personal information they deem to be inaccurate. Finally, the legislative provisions may grant individuals the right to lodge a complaint if they believe that the organization is not properly fulfilling its obligations under the law.

Good privacy practices are a key part of corporate governance, accountability and risk management.

### 1.2 OBJECTIVE

The purpose of this policy is to define the framework and responsibilities of each Little Brothers member in relation to the following:

- Obtaining consent from individuals with respect to the collection, use and disclosure of their personal information
- Importance of not collecting more information than is necessary to carry out activities
- Use of information only for its intended purpose
- Verification of the accuracy of the information and its retention for reasonable purposes.
- Individuals' access to their personal information
- Protection of information from improper access, use or disclosure

### 1.3 SCOPE

This policy applies to all staff, volunteers and interns of the organization, in all teams and regions.

It concerns personal information collected about Great Friends, volunteers, interns, donors, partners and staff members, and anyone else who has provided information in order to stay informed about the organization's programs.

### 1.4 DEFINITIONS

#### 1.4.1 PERSONAL INFORMATION

Personal information is defined as any information that can be used to identify an individual, such as a name, address, telephone number, medical record, criminal record, photograph or image. Such

information is confidential and, except as otherwise provided for by law, may not be disclosed without the consent of the individual in question.

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#### 1.4.2 TACIT C OR EXPLICIT CONSENT

When collecting personal information, it is necessary to explain to the individual in question the purposes for collecting this information and to obtain their prior consent.

Implied (or tacit) consent is consent that is self-evident, without being formally expressed verbally or in writing. For example, if a potential volunteer completes a registration form, they can reasonably expect their information to be collected and used as part of their involvement with the organization. In such a case, the individual voluntarily provides their personal information.

Explicit (or express) consent is sometimes required, which means that the organization must clearly notify individuals concerned (verbally or in writing) that they have the option of consenting or not and obtain their formal consent. For example, written consent must be obtained before doing criminal background checks on candidates or when using photographs in the organizations' publications. Internal consent forms are available for this purpose.

## 2. GUIDING PRINCIPLES

The organization collects personal information about donors, partners, Great Friends, volunteers, interns, employees and event attendees. This information is used for the purposes of funding, public education and awareness, service and program delivery, and to establish, maintain and manage relationships with these individuals.

### 2.1 ACCOUNTABILITY

The organization is responsible for the personal information it collects. The President and CEO is appointed to ensure compliance with the principles set out below.

The organization's responsibility extends to all information it collects and its responsibility includes all staff and volunteers who have access to it and who are therefore responsible for the personal information they collect, control or have access to in the course of their duties. In addition, they have the obligation of discretion and confidentiality, in accordance with this policy and the spirit of the law; any breach thereof may lead to disciplinary measures, up to and including the dismissal of employees and the termination of volunteer engagement, depending on circumstances.

Privacy issues are an integral part of the Code of Ethics and are integrated into orientation and training programs for new volunteers and employees.

The organization holds and collects a record of incidents.

### 2.2 IDENTIFYING PURPOSES FOR COLLECTING INFORMATION

Personal information is collected from and about individuals to ensure the effectiveness of programs or activities such as fundraising, recruiting, managing and terminating relationships with volunteers and staff members. Information may also be used to keep statistics or evaluate recruitment strategies.

[Appendix 1](#) of this document presents the types of information collected about each type of person and the intended purposes.

Proper information management ensures the availability of personal information for decision-making

and protects the rights of the organization as well as individual rights. It constitutes evidence of an individuals' personal history and evolution within the organization and can serve as a documented source of accurate information about them.

### 2.3 CONSENT

All individuals are informed of any collection, use or disclosure of their personal information and consent to it tacitly or explicitly, unless it is not appropriate to do so. To do this, the organization:

- Clearly defines what information is mandatory and essential to its processes, and what information is optional
- Describes how the collected information will be used in the course of its activities
- Is transparent about when personal information may be disclosed and whether it will be shared with other programs, external third parties, or as required by law
- Specifies whether the organization intends to verify the personal information submitted
- Ensures, as much as possible, that the information provided by individuals is complete, accurate and true
- Indicates administrative or other penalties that may apply if an individual provides false information

### 2.4 USE AND DISCLOSURE

Personal information must only be used and disclosed for the purposes for which it was collected, except with consent or as required by law. The organization retains personal information only for as long as necessary for the fulfillment of the identified purposes.

In addition, volunteers' personal information (including photographs and their biography) may be collected, used and disclosed as part of the organization's activities, such as in newsletters published on the website or social media.

The disclosure of personal information is subject to the legislation governing the organization. Thus, personal information may be disclosed:

- For the purpose for which the information was collected or for a use related to a particular need (for example, determining or verifying an individual's suitability to volunteer with the organization)
- If an individual has consented in writing to the disclosure of their personal information (for example, to communicate with the spouse, a family member or contact person of a volunteer who is injured or ill)
- If disclosure is necessary to comply with an existing federal or provincial law
- In the event that Little Brothers would like to use the personal information for a purpose other than that for which it was collected, the organization must first obtain the individual's consent

Regardless of the circumstances, the organization does not rent, sell or exchange individuals' personal information.

### 2.5 STORAGE

Personal information, references, criminal background checks, and any other such information is collected in databases. A process with a retention and disposal schedule specifies how long a record or file can be kept before it is destroyed and identifies those that need to be kept permanently. The organization retains personal and financial information for as long as necessary in accordance with relevant federal and provincial government regulations.

## 2.6 SECURITY MEASURES

Personal information is protected by security safeguards appropriate to the sensitivity of the information.

The organization puts in place and ensures adequate safeguards so that access to individuals' personal information is limited to the following persons:

- Persons authorized by the organization who require the information to perform their duties
- Persons to whom consent has been given
- Persons authorized by law

The creation and effective management of both electronic and paper files must include control mechanisms to ensure their integrity and authenticity, track their dissemination, and prevent unauthorized access and use, or inappropriate and mischievous amendment or removal.

Little Brothers makes every effort to protect against the loss, misuse and alteration of the personal information it holds. Security policies are reviewed periodically and improved as necessary.

In certain limited circumstances, it may be necessary to share certain pieces of information with service providers retained by Little Brothers. These providers must be committed to maintaining the confidentiality and security of personal information. In addition, they are prohibited from using or disclosing personal information for any purpose other than providing the services for which they have been hired.

Secure data networks protected by industry-standard firewalls and password protection systems are used. Credit card information is processed using industry-standard encryption systems and security and in compliance with Canadian commercial and banking laws. Computer and e-mail use is regulated in accordance with the organization's computer, Internet and e-mail policies.

## 2.7 TRANSPARENCY AND ACCESS TO PERSONAL INFORMATION

An organization shall make readily available to all individuals specific information about its policies and practices relating to the management of personal information.

All individuals may inquire, by making a written request to the General Management, about the existence of their personal information, how it is used, and whether it has been communicated to third parties. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Subject to legal and contractual requirements, an individual may, at any time, withhold or withdraw consent for some of the above-mentioned purposes by contacting the organization.

## 2.8 LODGING A COMPLAINT ABOUT NON-COMPLIANCE WITH THE PRINCIPLES

Any individual may lodge a complaint about non-compliance with this policy or generally accepted principles related to privacy protection by contacting the General Management at [directiongenerale@petitsfreres.ca](mailto:directiongenerale@petitsfreres.ca) or at 1-866-627-8653, ext. 1000. If, at any time, an individual wishes to remove their name from the distribution lists, they must simply contact the organization to make the request. The organization keeps a log of all incidents.

## 2.9 COOKIES

A cookie is a small piece of data sent to a WEB browser and stored on a computer. It allows the organization to improve its website by communicating information about the interests of users who visit various sections of the site. Cookies do not contain personal data and can be deleted by users at any time.

## 3. RESPONSIBILITIES

### 3.1 BOARD OF DIRECTORS

The Board is responsible for:

- Approving this policy and its subsequent amendments
- Ensuring that adequate follow-up is done by one of its committees

### 3.2 HUMAN RESOURCES AND INTERNAL COMMUNICATIONS COMMITTEE

The Human Resources and Internal Communications Committee is responsible for:

- Recommending changes to this policy to the Board
- An annual following up on the application of this policy with General Management

### 3.3 GENERAL MANAGEMENT

General Management ensures:

- That measures and controls are in place to ensure the proper collection and management of personal information
- That the Human Resource Department has all the resources required to ensure the proper application of this policy and raise issues related to this policy where appropriate

## 4. TABLE OF MODIFICATIONS

| EFFECTIVE DATE | MODIFICATIONS   | DETAILS  |
|----------------|---|--|
| 2015-02-16     | Effective date  | Adoption by the Corporation's Board of Directors |
| 2018-05-18     | Amendments submitted to CRHCI   |  |
| 2018-05-22     | Minor changes and streamlining of the policy by removing redundancies | Adoption by the Corporation's Board of Directors |
| 2020-05-21     | Minor changes   |  |
| 2020-06-22     | Changes to make wording more inclusive                                | Adoption by the Corporation's Board of Directors |

|                   |                                   |  |
|-------------------|-----------------------------------|--|
| <b>2023-10-02</b> | Amendments to comply with Law 25. | Adoption by the Corporation's Board of Directors |
|-------------------|-----------------------------------|--|





## APPENDIX 1 – TABLE OF COLLECTION OF INFORMATION

The following table presents the types of information collected on each type of person connected to the organization and the general purposes for which it is collected. All of these types of information are personal and confidential and are governed by this policy and related laws.

| TYPES OF INFORMATION COLLECTED                              | GREAT FRIENDS | VOLUNTEERS | INTERNS | DONORS | EMPLOYEES | OTHERS | CONSENT        | PURPOSE   |
|---|---------------|------------|---------|--------|-----------|--------|----------------|---|
| Names, addresses, phone numbers, email, etc.                | X             | X          | X       | X      | X         | X      | Form, tacit    | Identification, communications                  |
| Date of birth   | X             | X          | X       |        | X         |        | Form, tacit    | Identification, birthday celebration            |
| Skills, training, occupation, areas of expertise/profession |               | X          | X       |        | X         |        | Form, tacit    | Orientation, employment duties                  |
| Interests, skills, preferences                              | X             | X          | X       |        |           |        | Form, tacit    | Orientation, employment duties                  |
| External references   |               |            | X       |        | X         |        | Form, explicit | Validation of information                       |
| Criminal record   |               | X          | X       |        | X         |        | Form, explicit | Great Friends' safety                           |
| ID information (driver's license, health insurance, etc.)   |               |            | X       |        | X         |        | Form, explicit | Criminal records, insurance, bank signatures    |
| Participation in activities                                 | X             | X          | X       |        |           |        | Tacit          | Follow-up, management, statistics               |
| Participation in training offered by Little Brothers        |               | X          | X       |        | X         |        | Tacit          | Follow-up of competencies                       |
| Donor history*  |               |            |         | X      |           |        |                | Follow-up, solicitation, management, statistics |
| Follow-up notes   | X             | X          | X       | X      | X         |        |                | Follow-up, evidence on file                     |
| Photos  | X             | X          | X       | X      |           |        | Form, explicit | Communications, memento, gift                   |

**Note \*:** The amount and date of the donation, the name of the spouse, if the contribution was made as a couple; preferences on method of payment, banking information and billing data (credit card and expiry date, chequing account transition numbers, which will be destroyed once the donation is processed).

## APPENDIX 2 – TABLE OF FILE RETENTION PERIODS

|                               | <b>Contents of the file</b>  | <b>Retention period</b>                                |
|-------------------------------|--|--|
| <b>Great Friend</b>           | Evaluation sheet, copy of incident report, other miscellaneous documents   | 7 years after Great Friend's death or inactivated file |
| <b>Volunteer &amp; Intern</b> | Registration form, criminal record certificate, interview form, copy of incident report, various commitment and authorisation forms (ethics, confidentiality, etc.)  | 7 years after death or inactivated file                |
| <b>Individual donors</b>      | The amount and date of the donation, the name of the spouse, if the contribution was made as a couple; preferences on the method of payment, banking information and billing data (credit card and expiry date, chequing account transition numbers, which will be destroyed once the donation is processed) | 7 years after death or departure                       |
| <b>Employees</b>              | Curriculum vitae, copy of diplomas, interview form, new employee onboarding form, departure form, various commitment and authorization forms (ethics, confidentiality, photo release, etc.)  | 7 years after termination of employment                |

## ANNEX 3 – ACCESS TO DIGITAL PERSONAL INFORMATION

### Great Friend, volunteer and partner databases

- Full access for staff in connection with duties after basic training, password restricted
- Access for some volunteers and interns with required training, password restricted

### Donor databases

- Full access for finance staff after basic training, password restricted
- Access for certain volunteers and interns under employee supervision, restricted by a temporary password

### Employee records and payroll management tool

- Access for all employees to their personal data, password restricted
- Access for managers to employee work files
- Access for Accounting, Human Resources and the General Management to all employee information, restricted by access hierarchy and password