

## **PRIVACY POLICY**

### **OPERATION MIGRATION INC. AND OPERATION MIGRATION (USA) INC.**

Operation Migration Inc. and Operation Migration (USA) Inc. (together "OM") recognizes the importance of privacy and the sensitivity of personal information. As registered charitable corporations we take seriously our obligation to keep confidential all personal information we receive from donors, supporters, members and others. We are committed to protecting any personal information we hold. This Privacy Policy outlines how we manage your personal information and safeguard your privacy.

Operationmigration.org respects your privacy, and we want you to understand the ways in which we do and do not use the information that you transmit when you visit our Web site.

#### **Cookies and Non-Personally Identifiable Information**

To help make our site more responsive to the needs of our visitors, we invoke a standard feature found in browser software, called a "cookie", to assign each visitor a unique, random number; an anonymous user ID that resides on your computer. The cookie doesn't identify the visitor; we won't know who you are, even if we assign a cookie to your computer. A cookie can't read data off your hard drive.

Finally, Operation Migration keeps records of certain non-personally identifiable information such as the number of hits a Web page receives, IP address, and other aggregate data. We do not link this aggregate data with any personal information. Third parties that help us administer our Web sites may have access to this non-personally identifiable, aggregate data.

#### **IP Addresses**

Our Web servers automatically collect limited information about your computer's connection to the Internet, including your IP address, when you visit our sites. (Your IP address is a number that lets computers attached to the Internet know where to send you data - such as the Web pages you view.) Your IP address does not identify you personally. We use this information to deliver our Web pages to you upon request, to tailor our sites to the interests of our users and to measure traffic within our sites.

You should note that our sites include links to other Web sites whose privacy practices we don't control. Once you leave our servers (you can tell where you are by checking the URL in the location bar on your browser), use of any information you provide is governed by the privacy policy of the operator of the site you're visiting. If you provide information in the course of obtaining products or services through our site, use of any information you provide may be governed by the privacy policy of the provider of those products or services, even if it appears that you're on Operation Migration-branded pages. These parties may have privacy policies and practices that differ from ours. If you can't find the privacy policy of any of these sites via a link from the site's homepage, you should contact the site directly for more information. We encourage everyone to be proactive in understanding how his or her information is collected and used online.

#### **The OM Store**

Operation Migration knows that the confidentiality of purchase-related information is of special concern to visitors who purchase items through operationmigration.org. Operation Migration is committed to safeguarding this information. We will not share any personally identifiable information (such as your name, address or telephone number) that you provide us when you make a purchase through The OM Store with any other company, except where necessary for the vendor to fulfill the order.

#### **GuestBook Security**

All information gathered on operationmigration.org is protected for storage within an operationmigration.org controlled database. However, any information you include in a message you post to the GuestBook is available to anyone with Internet access. If you don't want people to know your email address, do not include it in any message you post publicly.

#### **A Note to Kids**

Operation Migration encourages you to get permission from your parents before sending any personal information about yourself (such as your name or your email to anyone).

## **Your Privacy Rights**

Since January 1, 2004, all organizations engaged in Canada must comply with the *Personal Information Protection and Electronic Documents Act*, (the "Act") and the Canadian Standards Association Model Code for the Protection of Personal Information, which it incorporates. These obligations extend to charitable organizations in Canada, including OM. The Act gives you rights concerning the privacy of your personal information.

OM is responsible for the personal information we collect and hold. To ensure this accountability, we have developed this Privacy Policy, and trained our personnel about our policies and practices.

## **Why Does OM Need Personal Information?**

OM keeps a database of members, donors and supporters of the good works we do. We rely on the information in the database to keep track of our membership and donors and to keep them informed of our work in the field, to issue charitable receipts to donors, to keep people informed about special offerings of goods we sell in support of funding our charitable activities, and we solicit support from those that have in the past shown interest in our work and supported our fundraising needs.

## **What personal information do we collect?**

Personal information is any information that identifies you, or by which your identity could be deduced. We collect and use your personal information because it is necessary to do so in order to inform, document donation and seek additional support. The information is relevant to accounting and invoicing, corresponding with you and often for proper documentation of tax deductible donations.

We also collect personal information about our employees in order to manage and administer their compensation and benefits.

## **How do we collect your personal information?**

We collect information only by lawful and fair means and not in an unreasonably intrusive way. Wherever possible we collect your personal information directly from you, when you purchase a membership or make a donation. You may give us your personal information verbally, in correspondence or through donation or purchase options available through our website.

Sometimes we may obtain information about you from other sources, for example, if we have obtained it from another organization that may lawfully give it to us for the uses described in this Privacy Policy.

## **Consent**

In some cases, we shall ask you to specifically consent, if we collect, use, or disclose your personal information. Normally, we ask for your express oral or written consent. Sometimes, your consent may be implied through your conduct with us. For example, when you give us your mailing address along with a donation, we assume you have consented to the use of that address to mail a receipt, a thank-you or a newsletter to you.

By disclosing your personal information to us over the telephone, electronically, in writing or in person you consent to the collection, storage and processing of your personal information by OM as stated in this Privacy Policy.

By accepting employment with OM you consent to the collection, storage and processing of your personal information by OM as stated in this Privacy Policy.

## **Use of Your Information**

We use your personal information to keep track of our membership and keep our members informed of our work in the field, to issue charitable receipts to donors, to keep people informed about special offerings of goods we sell in support of funding our charitable activities, and we solicit support from those that have in the past shown interest in our work and supported our fundraising needs, and to include you in any direct marketing activities we may undertake for events or offers that we believe will be of interest to you. If you tell us that you no longer wish to receive information about our work, or about our funding needs, we will not send any further material.

OM may disclose your personal information to some third parties that we have specially selected and approved to enable them to inform you about their products and services or to solicit support from you for their charitable activities. We will do so only in circumstances where we believe many of our members and donors will have an interest in the product, service or charitable work of such third party.

### **Disclosure of your Personal Information**

Under certain circumstances, OM will disclose your personal information:

- when we are required or authorized by law to do so, for example if a court issues a subpoena, or if Canada Revenue Agency or the Internal Revenue Service audits our charitable donation receipts;
- when you have consented to the disclosure;
- where it is necessary to establish or collect fees;
- if we engage a third party to provide administrative services to us (like computer back-up services or archival file storage) and the third party is bound by our Privacy Policy;
- if the information is already publicly known.

### **Updating Your Information**

Since we use your personal information to provide services to you, it is important that the information be accurate and up-to-date. If any of your information changes, please inform us so that we can make any necessary changes.

### **Is My Personal Information Secure?**

OM takes all reasonable precautions to ensure that your personal information is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect your information are:

- premises security;
- restricted file access to personal information;
- deploying technological safeguards like security software and firewalls to prevent hacking or unauthorized computer access;
- internal password and security policies.

### **Access to Your Personal Information**

You may ask for access to any personal information we hold about you. Summary information is available on request. More detailed requests which require archive or other retrieval costs may be subject to normal professional and disbursement fees.

### **Correcting Errors**

If OM holds information about you and you advise us that it is not accurate, complete and up-to-date, OM will take reasonable steps to correct it.

### **Can I be Denied Access to My Personal Information?**

Your rights to access your personal information are not absolute. We may deny access when:

- denial of access is required or authorized by law;
- when granting you access would have an unreasonable impact on other people's privacy;
- to protect OM's rights and property;
- where the request is frivolous or vexatious.

If we deny your request for access, or refuse a request to correct information, we shall explain why. OM does not use your Social Insurance Number as a way of identifying or organizing the information we hold upon you.

### **Communicating with Us.**

You should be aware that e-mail is not a 100% secure medium, and you should be aware of this when contacting us to send personal or confidential information. We may communicate with you by telephone, facsimile, in writing by mail and courier and by email. In each case we will take reasonable steps appropriate to the medium to protect your privacy.

**Changes to this Privacy Policy**

The Web is an evolving medium. If we need to change our privacy policy at some point in the future, we'll post the changes here. Of course, our use of information gathered while the current policy is in effect will always be consistent with the current policy, even if we change that policy later.

**Requests for Access**

If you have any questions, or wish to access your personal information, please write to our Privacy Officer, Liz Condie at:  
3-174 Mary St. Suite 101  
Port Perry, ON L9L 1B7

If you are not satisfied with our response, the Privacy Commissioner of Canada can be reached at  
112 Kent Street,  
Ottawa Ontario, K1A 1H3  
1.800.282.1376.

**Employment Inquiries**

If you apply to OM for a job, we need to consider your personal information, as part of our review process. We may retain information from candidates after a decision has been made, unless you ask us not to retain the information. If we offer you a job, which you accept, the information will be retained in accordance with our privacy procedures for employee records.

**Web Site**

Our website contains links to other sites, which are not governed by this privacy policy. On our website, like most other charity websites, we may monitor traffic patterns, site usage and related site information in order to optimize our web service. We may provide aggregated information to third parties, but these statistics do not include any identifiable personal information.