

Privacy Policy

BridgeWay Family Centre (BridgeWay) is a charitable organization that has been serving families in Peel for over thirty years. With the help of our partners and funders and through the participation of parents and caregivers we help build stronger families. We do this by providing education and support to pregnant women as they learn about healthy pregnancy, infant care, child development and parenting, by delivering enriching programs and early learning experiences for children up to 6 years of age and by providing supports for their families.

POLICY

Our Privacy Commitment to You

BridgeWay is committed to keeping your personal information accurate, confidential, secure and private. When you visit our website, contact us, participate in one of our programs, attend an event, or make a donation to support our activities, we are committed to protecting your privacy rights and your personal information. BridgeWay's privacy policy is based upon the 10 Privacy Principles contained within the Canadian Standards Association (CSA) Model Privacy Code for the Protection of Personal Information and reflects the requirements of applicable legislation including the Freedom of Information and Protection of Privacy Act (FIPPA). This privacy policy describes the principles that BridgeWay will use to protect the privacy of your personal information in its possession. It addresses the reasons why such information is collected, how it is used, how its confidentiality is protected and outlines your rights with respect to this information. This privacy policy is applicable to our members, clients, community partners, donors, potential supporters, volunteers and employees. Personal information is defined as any factual or subjective information, recorded or not, about an identifiable individual. Examples are age, name, source of income, home addresses and telephone numbers. Personal information does not include the name, title, or business address or telephone number of an employee of an organization.

BridgeWay's Privacy Principles

1. Accountability

BridgeWay is responsible for the protection of your personal information collected through our office(s), program activities and website. Individuals will be asked to review and sign a consent form before any personal information is released to third parties for the purpose of providing enhanced services or otherwise.

We use third parties to assist with payment processing, to provide technical support and solutions, and to host and manage our website. Our service providers are given the information they need to perform their designated functions, and are not authorized to use or disclose personal information for their own marketing or other purposes.

The BridgeWay manager designated as BridgeWay's Privacy Officer has overall responsibility for the protection of personal information and for BridgeWay's compliance with this privacy policy.

Lynn Rozon, Senior Manager Privacy Officer BridgeWay Family Centre 1801 Lakeshore Road West, Unit 101 Mississauga, ON L5J 1J6

Phone: (905) 822-1114 X30; Email: lynnrozon@bridgewaycentre.ca

BridgeWay's Privacy Officer Responsibilities include

- Documentation of uses of personal information
- Training employees in correct practices
- Compliance monitoring
- Reporting and dispute resolution

2. Identifying Purposes

BridgeWay will provide a statement to explain the purpose(s) for the collection of your personal information wherever possible, before we ask you to disclose it. We collect personal data when you make use of or register for our programs and services, in order to better meet your program, service and information needs. We also use and disclose data, which does not identify individuals, for statistical purposes to assess, develop and improve BridgeWay's programs and services. We also collect personal information in order to refer you to enhanced services, or to satisfy legal, funder and regulatory obligations. We do not sell personal information we collect. We will not disclose your personal information to anyone else without your prior knowledge or consent, except when required by a government body or agency, or as permitted by law. If you supply us with your contact information, you may hear from us about important information concerning BridgeWay's program or service for which you are registered. You may also hear from us about other BridgeWay programs and services that may interest and benefit you or we may ask you for feedback about the services you have already received as part of our quality assurance commitment. In addition, we may provide you with information on the ways you can support us and the work that we do. If you do not wish to receive information about other BridgeWay programs, services or opportunities, please call (905) 822-1114 X30 or email info@bridgewaycentre.ca.

Using our Website

You can access our website home page and browse our site without disclosing your personal data. Any personal information that site visitors voluntarily choose to provide in order to donate, receive free electronic newsletters, participate in periodic polls and surveys and/or to complete any of our online application forms IS NOT shared with third parties unless stated otherwise. BridgeWay will ensure all personal information is secured and remains confidential.

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BridgeWay's Use of Cookies

A cookie is a small text file containing a unique identification number that is transferred from a website to the hard drive of your computer so that the website may identify separate visitors to the site and track users' activities on the website. A cookie will not let a website know any personally identifiable information about you, such as your real name and address. BridgeWay uses cookies only to keep track of how many people visit BridgeWay's website and how frequently each page is visited. Each individual movement of any user cannot be tracked while on BridgeWay's site. Cookies are only used to track page popularity for statistical purposes and to improve the quality of the site and meet your needs. (For more information on cookies, please check your browser's settings.)

Links on our Website

Because BridgeWay wants your website experience to be informational and resourceful, our Website also provides a number of links to third party sites. BridgeWay assumes no responsibility for the information practices of sites you are able to access through our site. We encourage you to review each site's privacy policy before disclosing any personally identifiable information.

3. Consent & Disclosure

The only personal information that BridgeWay collects is with your knowledge and consent. You can choose not to disclose any personal information we may ask you to provide. However, a decision to withhold some personal information can result in our inability to provide you with some of our services. Further, you can withdraw your consent to the collection, use or disclosure of your personal information at any time, subject to any legal requirements and reasonable notice.

4. Limiting Collection

The amount and type of information that BridgeWay collects is limited only to that which is necessary to fulfill the purposes identified. BridgeWay will ask for the information it requires directly from the individual. Personal information will be collected using procedures which are fair, transparent and lawful. You can choose to disclose as much or as little personal information as you are comfortable with. As noted in Principle 3, a decision to withhold some personal information can prevent us from providing you with some of our services.

5. Limiting Use, Disclosure and Retention

BridgeWay will use your personal information only for the purposes for which it was collected.

Your information will not be disclosed without your knowledge and consent, unless permitted or required by law. Your personal information will be retained only as long as necessary to fulfill the purposes for which it was collected, and in compliance with any laws surrounding

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information retention. If all identified purposes for the use of your personal information have been exhausted, we will destroy the information or render it unidentifiable.

6. Accuracy

In order to ensure the reliable delivery of services and information, your personal information will be kept accurate, complete and up to date. We assume that the information that you provide to us is accurate. If at any time your personal information changes, we hope to be informed of it immediately. If you contact us with a request, we will take appropriate steps to update or correct the personal information in our possession that you have previously provided to us.

7. Safeguards

BridgeWay employs a number of safeguards to protect your personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Such safeguards include physical measures, for example, locked filing cabinets, restricted access to offices, limiting access on a "need to know" basis, and use of passwords and encryption. Procedures for implementing these measures are communicated to all employees to ensure compliance with this principle.

8. Openness

BridgeWay has easily understandable and readily available specific information about its policies relating to the management of personal information. Our policy is available at all times on BridgeWay's website, www.bridgewaycentre.ca, in the footer under "Privacy Policy".

9. Individual Access

You have the right to access your Personal Information that is in our custody or under our control. The request must be in writing and directed to the Privacy Officer who will assist with all reasonable access requests. A fee may be charged for retrieval and copying of your Personal Information. If the retrieval or copying related to your request requires a fee, we will notify you of the fee prior to proceeding.

In certain exceptional circumstances, we may not be able to provide access to certain Personal Information. Such access will only be restricted in accordance with applicable privacy legislation. Circumstances where we may not provide access include the following:

• where access may disclose Personal Information about another individual

If access cannot be provided, we will give you written notice of the reasons for refusal. If access has been provided, and Personal Information is demonstrated to be inaccurate or incomplete, we will correct the Personal Information as required. Where appropriate, we will transmit the corrected Personal Information to other parties having access to the Personal Information in question.

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Upon request, we will inform you if we hold any personal information about you and provide you with access to this information. If we have any personal information about you, we will also tell you for what purposes it is used for, if applicable. You have a right to update any personal information that we hold on you. Should you wish to see the full contents of your information that is on file, you must make a formal written request and mail or email it to:

Lynn Rozon, Senior Manager Privacy Officer BridgeWay Family Centre 1801 Lakeshore Road West, Unit 101 Mississauga, ON L5J 1J6

Phone: (905) 822-1114 X30; Email: lynnrozon@bridgewaycentre.ca

We will respond to you within thirty (30) days after receipt of your written request or will notify you if a longer period is required by us in order to fully address your request, provided that an extension of thirty (30) day period is permitted by applicable privacy laws.

10. Challenging Compliance

If, for any reason, you are concerned about our compliance with our privacy policy, you may contact our Privacy Officer in writing, by phone or by email:

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BridgeWay has policies and procedures to receive, investigate and respond to individuals' complaints and questions.

If you are not satisfied with the way BridgeWay has responded to a complaint, you can contact the Privacy Commissioner of Canada.

This privacy policy may be updated from time to time. Notice of changes to this privacy policy that affect you will be posted at bridgewaycentre.ca.

This policy was last revised March 28, 2017.

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