



DOWNIE WENJACK Respects Your Right to Privacy

Your privacy and security are important to us. DOWNIE WENJACK respects your right to privacy and is committed to protecting the personal information you provide to us. We use the information collected through our website to facilitate donation collection and processing, to provide tax receipts, to process online account registrations and to communicate relevant news and updates. DOWNIE WENJACK does not trade, license, rent or sell your personal information in any manner.

Privacy Statement and Summary

DOWNIE WENJACK works carefully to ensure that your personal information is kept safe and secure throughout the transaction process and otherwise while in our custody or under our control. DOWNIE WENJACK is committed to protecting and safeguarding the privacy and security of the personal information provided to us by our donors and registered charities in compliance with the Personal Information Protection and Electronic Documents Act (Canada) (PIPEDA). By making a donation, requesting information, or registering for an account on our website, you are giving DOWNIE WENJACK permission to collect some of your personal information and to contact you by way of the information provided for the purposes outlined in this Privacy Policy. This Privacy Policy explains what information we collect and why we collect it, how we use that information, how the confidentiality of this information is protected, and how you can find out what personal information is recorded.

Downie Wenjack offers customizable donation tools to charities to assist with their fundraising efforts. This Privacy Policy also applies as set out below to personal information collected by Downie Wenjack for charities using these customized donation tools.

General Privacy Practices

Downie Wenjack observes the following privacy practices from its direct-to-donor site where visitors can donate or fundraise for any Canadian Registered Charity:

- DOWNIE WENJACK collects information only for specified purposes.
- We only require that you provide the necessary amount of personal information to provide any service, as required by law or by the Canada Revenue Agency (CRA).
- We may ask you for more information about yourself to help us provide you with more personalized information and services, but in such cases, you are not obligated to provide such information.
- Personal information gathered by DOWNIE WENJACK is held in the strictest confidence and is protected by industry standard best practices.

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- In certain instances, Donors are able to restrict the amount of information shared with the charities they support. In doing so, DOWNIE WENJACK may not be able to provide certain services that require personal information. DOWNIE WENJACK will inform you of the implications of opting out.

Downie Wenjack' makes the following accommodations to the above for charities using its customizable fundraising tools:

- In using Downie Wenjack' customizable fundraising tools, charities may require you to provide additional information in order to make a donation, obtain an event ticket, or fundraise for the charity
- Where the fundraising tool implemented by a charity does not include an Anonymity option permitting you to elect what information is shared with the charity, Downie Wenjack will provide all information that is collected to the charity

Charities using Downie Wenjack' customizable fundraising tools are required to agree to this Privacy Policy in its entirety.

What is Personal Information?

Personal information is defined as any information about an identifiable individual including information that can be used to recognize, identify or contact a specific individual, whether it concerns an email address, where an individual lives, or which interests, causes and organizations he or she supports. Personal information does not include most business contact information such as the name, title, business address, or business telephone or fax number or business email address of an employee of an organization, and certain publicly available information.

Changes to this Privacy Policy

DOWNIE WENJACK regularly reviews its privacy practices and updates its Privacy Policy as required. We recommend that you check this Privacy Policy periodically so that you are aware of any changes. The Privacy Policy posted at any time or from time to time via this website shall be deemed to be the Privacy Policy then in effect.

Links to Third Party Sites

This website may offer links to other third party websites. You should be aware that operators of linked websites may also collect your personal information (including information generated through the use of cookies) when you link to their websites. DOWNIE WENJACK is not responsible for how

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such third parties collect, use or disclose your personal information, so it is important to familiarize yourself with their privacy policies before providing them with your personal information.

Privacy Principles

DOWNIE WENJACK is committed to the following 11 privacy principles under PIPEDA:

1. Accountability

- DOWNIE WENJACK is responsible for personal information in our custody or under our control and we have designated a Privacy Official who is accountable for DOWNIE WENJACK' compliance with PIPEDA. There are other individuals within DOWNIE WENJACK who are responsible for day to day collection and management of personal information.
- DOWNIE WENJACK has policies and procedures in place to implement and comply with this Privacy Policy, including procedures relating to the collection, handling, disclosure, storage and destruction of personal information.
- DOWNIE WENJACK is responsible for personal information transferred by us to, or accessed by, third parties, if any, for processing on our behalf. DOWNIE WENJACK uses contractual means to provide an appropriate level of protection for such transferred information. Third parties entering into a business relationship with DOWNIE WENJACK are required to adhere to these privacy principles, this Privacy Policy, PIPEDA and any other applicable law dealing with the protection of personal information.

2. Identifying Purposes

DOWNIE WENJACK collects and uses personal information for the following purposes:

- To provide tax receipts when users make an online donation, or use other services such as Fundraising Pages or Gift Cards.
- To allow users to create or register for a DOWNIE WENJACK account and to manage those accounts.
- To administer pre-authorized recurring donations.
- To generate statistics and aggregate reports for internal and external use.
- To communicate directly with users, including through DOWNIE WENJACK service news and updates, charitable promotions, charitable stories we think will be of interest to you, or other forms of communications.
- To provide client support and help.
- For charities using Downie Wenjack' customized fundraising tools.

3. Consent to use your personal information

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- DOWNIE WENJACK collects personal information about you only when you voluntarily provide it or otherwise only with your consent as required by PIPEDA or by other applicable law.
- By visiting and using this website, the visitor agrees to the Privacy Policy and the terms of use linked to [here](#). If you do not agree to the Privacy Policy, do not use this Website or provide personal information to DOWNIE WENJACK.
- We will not, as a condition of the supply of our service, require you to consent to the collection, use or disclosure of information beyond that required to fulfill the explicitly specified and legitimate purposes for which the information is being provided.
- A user may withdraw his or her consent to use his or her personal information at any time, subject to any legal or contractual restrictions. If you wish to withdraw your consent, please contact the Privacy Official of DOWNIE WENJACK as described below. We will inform you of the implications of withdrawing consent.
- If you do not wish to receive marketing communications from us or participate in more personalized information and services, you may unsubscribe by following the directions provided with the communication.

4. Limiting Collection

DOWNIE WENJACK limits the collection of personal information to that which is reasonably necessary for the identified purpose. The types of information DOWNIE WENJACK collects can be summarized as follows:

1. **Personal Information provided to DOWNIE WENJACK:** DOWNIE WENJACK collects certain personal information directly from individuals who interact with our website or otherwise with us, including the following:
 - Contact information (such as name, address, e-mail address and telephone number);
 - Financial and billing information (such as credit card number/expiration date, broker and financial advisor information); and
 - Donation history (such as amount donated and charities donated to);
 - Tax receipt information; and
 - Account username and password information.
2. **Non-Personal Information:** When donors, volunteers, charities and other organizations access the secure section of our website, anonymous, non-personal information about their visit is automatically collected. This information may include the date of the visit, how the visitor uses the website, the length of the visit, what pages the visitor viewed, the type of browser and operating system being used, and the domain name of the visitor's Internet service provider. DOWNIE WENJACK may also collect statistics that describe how our visitors use our site. This information might include the average donation amount, the geographic breakdown of donations by area, what times of the day have the heaviest traffic, and which type of charity receives the most gifts. This information, collected in the aggregate, allows DOWNIE

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WENJACK to better serve donors and charities. None of these statistics reveal any personally-identifiable or individual information and DOWNIE WENJACK does not use any of this information to identify individuals. In certain cases, for the purposes of fraud detection and mitigation, IP addresses are collected in order to protect Downie Wenjack against possible illegal activities.

3. **Cookie-based Information:** When our clients, donors, volunteers, and other constituents access the secure section of our website, a small text file called a “cookie” is sent from our web server to their web browser and is stored on their computer. Cookies allow us to recognize users while he or she is logged into the DOWNIE WENJACK website. Cookies expire when the browser window is closed. Session Cookies employed by DOWNIE WENJACK are strictly used to perform the function that the user intended, such as keeping the user logged into the service in a secure fashion and processing transactions and gathering donations into a Gift Basket. Some browsers can be set to reject all cookies. If you choose to modify your browser in this manner, some pages of this website may not function properly.

5. Limiting Use, Disclosure and Retention

- DOWNIE WENJACK does not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as permitted or required by law.
- DOWNIE WENJACK does not disclose credit card account information provided by users except to the appropriate banking institutions or payment processing provider in order to process a credit or debit authorization for payment, or to resolve a dispute.
- DOWNIE WENJACK may have to disclose personal information to satisfy a law, regulation or government request, or to satisfy a subpoena, search warrant or legitimate court order.
- DOWNIE WENJACK may share personal information with third parties engaged to assist us in providing our services. Such third parties are contractually bound to protect your personal information as explained above under “Accountability”.
- DOWNIE WENJACK reserves the right to disclose and/or transfer personal information to a third party in the event of a proposed or actual purchase, sale, lease, merger, amalgamation or any other type of acquisition, disposal, transfer, conveyance or financing of all or any portion of DOWNIE WENJACK in order for you to continue to receive the same services from the third party.
- DOWNIE WENJACK retains personal information only as long as is necessary for the fulfillment of those purposes for which it was collected or as required by law, and your consent to such purposes(s) remains valid after termination of our relationship with you.

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6. Accuracy

DOWNIE WENJACK takes reasonable effort to keep personal information accurate, complete and as up to date as is necessary for the purposes that is being used. Individuals are permitted to check on the accuracy of their personal information and may make, or request, modifications or corrections, if necessary. DOWNIE WENJACK depends on individuals and organizations to help it in maintaining the completeness, accuracy, and timeliness of the information collected. You must log-in to your DOWNIE WENJACK online account to update, modify, correct or delete your personal information.

7. Safeguards

- DOWNIE WENJACK makes commercially reasonable efforts to protect personal information from loss, theft, unauthorized access, copying, use, modification, disclosure and destruction by establishing and maintaining appropriate security safeguards appropriate to the sensitivity level of the information.
- All DOWNIE WENJACK staff members are made aware of the need to maintain strict confidentiality of all personal information.
- DOWNIE WENJACK uses Transport Layer Security (TLS) technology to help ensure the safety and security of online donations. TLS technology enables encryption (scrambling) of sensitive information, including passwords and credit card numbers, during your online transactions.
- DOWNIE WENJACK has thorough security standards to protect our systems and personal information against unauthorized access and use. This includes the security protections required by PCI compliance as well as specific procedures to keep donation information secure, private and in Canada.

8. Openness

DOWNIE WENJACK makes information about our policies and practices related to the management of personal information readily available to users of our service and the general public. Our Privacy Policy, which informs users of the type of information we collect, what it is used for, and to whom the information may be disclosed, is posted on our website. Additional information about our privacy policies and practices can be obtained from our Privacy Official as described below.

9. Individual Access

Upon request DOWNIE WENJACK will:

- . Inform users of the existence and use of their personal information.
- i. Inform users whether their personal information has been disclosed to any authorized third parties.

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- ii. Provide users with access to their personal information in our custody or under our control subject to legal restrictions.

Requests are to be directed to:
Privacy Official
PO Box 749
Ohsweken, ON N0A 1M0

Or send an e-mail to staff@downiewenjack.ca

DOWNIE WENJACK will make every effort to respond to requests for access to personal information in a reasonable and timely manner.

10. Challenging Compliance

Any question, request, or concerns regarding DOWNIE WENJACK' compliance with respect to the Privacy Policy or about our privacy practices may be directed to the Privacy Official as described above.

Canada's Anti Spam Legislation (CASL)

Where CASL applies to DOWNIE WENJACK' communications with users, donors or volunteers, DOWNIE WENJACK is committed to complying with CASL and in particular the provisions setting out the requirements for sending commercial electronic messages.

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