

YMCA of Windsor and Essex County Data Management Policy



The YMCA is committed to protecting personal information, by following responsible information handling practices in keeping with privacy laws. The YMCA uses modern information and communication technologies to support our YMCA activities. Our Privacy Statement covers the YMCA and our website.

Anonymous Access

People can access our website home page and browse our site without disclosing their personal data.

We log access to our site by IP address in order to protect against and detect illegal 'hacking' activities. IP addresses are also logged and linked to information submitted in the secure registration areas of our site to protect us from fraudulent or malicious use of these features.

We collect personal information about clients / members via our website only if they volunteer it.

Services and links of our Website

Our website enables the public to communicate with us.

YMCA of Windsor - Essex assumes no responsibility for the information practices of sites members are able to access through our site. We encourage visitors to review each site's privacy policy before disclosing any personally identifiable information.

Accountability

YMCA of Windsor - Essex is responsible for Personal Information under its control. We have designated a staff person who is accountable for YMCA compliance with established privacy principles. Please contact:

Name: Betty Green

Title : Director of Finance

Phone: (519) 256-7330 Ext. 256

Email: betty_green@ymca.ca

Purposes

The YMCA shall identify the purposes for collecting Personal Information before or at the time Personal Information is collected.

The YMCA needs to collect, use and disclose some information about its participants, members, donors, parents/guardians, staff and volunteers, in order to conduct its operations, and deliver YMCA programs and services to the communities it serves.

YMCA of Windsor and Essex County Data Management Policy



The YMCA's purposes for collecting Personal Information are:

- To establish and maintain responsible relationships with its participants, members, donors, parents/guardians, staff and volunteers;
- To manage, develop, and enhance YMCA operations, programs and services;
- To acknowledge gifts, issue tax receipts, and other administrative requirements including information requests;
- To process and collect fees for service;
- To assess participant needs;
- To determine program, service, employment or volunteer eligibility;
- To provide safe and secure YMCA environments;
- To collect data for statistical purposes;
- To better understand the changing needs of communities we serve;
- To communicate a range of programs, services, and philanthropic opportunities that benefit people we serve;
- To meet legal, regulatory, and contractual requirements.

Consent

The knowledge and consent of an individual is required for the collection, use, or disclosure of Personal Information, except where not required or permitted by law.

In obtaining consent, staff and volunteers shall advise participants, members, donors, parents, staff and volunteers of identified purposes for which Personal Information will be used or disclosed.

YMCA of Windsor-Essex takes into account the sensitivity of the Personal Information when determining what form of consent is appropriate for the circumstances.

The YMCA will generally seek express consent when the information is likely to be considered sensitive. Express consent is required from an individual when dealing with more sensitive information, such as personal financial and medical data. For most YMCA employment and community service programs, the YMCA is obligated by its contract with the government to obtain express written consent from a participant to collect, use and disclose their Personal Information.

The YMCA considers implied consent generally to be appropriate when the information is less sensitive in nature. In general the following actions by an individual constitute implied consent for YMCA of Windsor - Essex to collect, use and disclose Personal Information for the purposes identified to the individual: registration for YMCA programs and services, completion of a donation pledge form, acceptance of employment and benefits enrolment by an employer, and acceptance of a volunteer position or student placement.

The YMCA obtains consents and permission slips for children and youth to participate in a number of YMCA programs and services. For children under 12 years of age, the

YMCA of Windsor and Essex County Data Management Policy



YMCA will obtain permission from a parent or legal guardian to collect and use personally identifiable information about a child.

Individuals may at any time withdraw their consent to the YMCA's use or disclosure of their Personal Information, subject to certain service, legal or contractual restrictions. Contact YMCA of Windsor - Essex through the address or email address listed under Accountability.

Limiting Collection

The YMCA shall limit the collection of Personal Information to that which is necessary for the purposes identified by YMCA of Windsor - Essex. Information shall be collected by fair and lawful means.

When collecting Personal Information, staff and volunteers will usually collect it directly from the individuals about whom the Personal Information pertains.

Personal Information may be collected from other sources with prior consent from the individual, for example, from prior employers, personal references or from third parties having the right to disclose the information.

Limiting Use, Disclosure, and Retention

YMCA of Windsor - Essex shall 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 required by law. Personal Information shall be retained only as long as necessary for the fulfillment of those purposes.

YMCA of Windsor - Essex has developed and implemented policies and procedures to govern the storage and destruction of Personal Information.

Accuracy

Personal Information shall be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

Safeguards

YMCA of Windsor - Essex shall protect Personal Information by security safeguards appropriate to the sensitivity of the information.

Staff are educated and trained to protect Personal Information in their control against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security safeguards.

Openness

YMCA of Windsor - Essex shall make readily available to individuals, information about its procedures and practices relating to the management of Personal Information.

YMCA of Windsor and Essex County Data Management Policy



Individual Access

YMCA of Windsor - Essex shall upon request inform an individual of the existence, use, and disclosure of his or her Personal Information and shall give the individual access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Upon an individual's written request to the address listed in the Accountability section, we will provide information about the existence, use, and disclosure of an individual's Personal Information and access to the information.

If an individual believes that the Personal Information held by the YMCA is inaccurate or incomplete, he or she has the right to challenge the accuracy and completeness of the information, and to provide a written request for amendment of such information to the address listed in the Accountability section of this policy.

Upon an individual's written request to the address listed in the Accountability section we will provide an account of the third parties to which his or her Personal Information has been disclosed. When it is not possible to provide a list of the organizations to which Personal Information has actually been disclosed, the YMCA will provide an individual with a list of organizations to which the YMCA may have disclosed information.

In a written request, please provide name, address and telephone number, and the location where YMCA service was received.

Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated person accountable for YMCA Compliance.

Individuals may contact YMCA of Windsor - Essex regarding compliance with these principles at the address listed in the Accountability section of this policy.

Privacy Questions

If you are aware of any inaccuracy or changes in the Personal Information which we hold about you, please contact a YMCA staff member.

If you have questions or if you do not wish to receive further information or contact from the YMCA, contact: Betty Green

If you have a complaint or concern about YMCA's information handling practices, we encourage you to talk to us.

In most cases, discussing your concern with a Program Manager for your YMCA program or service, will address your concern.

YMCA of Windsor and Essex County Data Management Policy



If the problem is not resolved to your satisfaction, you can contact Betty Green (see contact information above). You will be asked to provide the following information in writing:

Your name, address or fax number where you prefer to be reached;
Nature of your complaint, relevant details, and what you would like us to do;
Name of the YMCA staff with whom you have already discussed the issue.

The YMCA will investigate and assist with resolving your concern.