



The Historica-Dominion Institute Privacy Statement **WE VALUE YOUR PRIVACY**

Any personal information gathered by The Historica-Dominion Institute (“HDI”, “we”) will only be used by HDI, its affiliates, or any organization authorized by HDI, in a manner consistent with the implementation of policies and procedures in the Personal Information Protection and Electronic Documents Act (PIPEDA). HDI will conduct itself, in all areas of ongoing business and operations in a manner which will protect all personal information collected, stored and used in such activities in a manner consistent with the mandate of PIPEDA.

1. Objective and scope of policy

HDI is committed to respecting your privacy and has prepared this Policy Statement to inform you of our policy and practices concerning the collection, use and disclosure of your personal information. This Policy Statement governs personal information collected from and about individuals who are or may become customers and those other individuals or partners with whom we work. It does not govern personal information that HDI collects from and about our employees, the protection of which is governed by other HDI policies.

This Policy Statement also governs how HDI treats personal information in connection with your use of an HDI web site. Using contractual or other arrangements, HDI shall ensure that agents, contractors or third party service providers, who may receive personal information in the course of providing services to HDI as part of our delivery of products and services, protect that personal information in a manner consistent with the principles articulated in this Policy Statement.

In the event of questions about: (i) access to your personal information; (ii) HDI's collection, use, management or disclosure of personal information; or (iii) this Policy Statement; please contact:

The Historica-Dominion Institute
2 Carlton Street, East Mezzanine
Toronto, ON M5B 1J3
Attn: Privacy Officer
privacy@historica-dominion.ca

2. Protection of personal information

The collection or transfer of your personal information is our responsibility when it is obtained through our National Office, The Canadian Encyclopedia, the Encounters With Canada program, or our Fundraising Campaign Office. We accept this responsibility whenever we, or an agency on our behalf, handle your personal information. Our plan to secure your personal information from disclosure includes a member of the staff at the National Office being assigned the responsibility for HDI compliance to PIPEDA. We will, under this plan audit and maintain our privacy policy, our information systems and train all personnel accordingly. At any time, anyone having personal information in our possession may, according to our procedures, request and gain access to their own information for purposes of review.



3. Identification of purposes of collection of information

We will identify the purpose for the collection of personal information, before we collect your personal information. HDI will use a “collection purpose” statement on documents and materials distributed by programs and offices when collecting any information which may be used to identify an individual

4. Knowledge and consent

We will never collect your personal information without your knowledge and prior consent. Depending on the timing and/or purpose of the collection of information we may employ one of two methods of collection; one being an express consent option which requires you to provide information in a written manner indicating the purpose and your voluntary agreement to provide this information; or, a second option whereby you are required to notify us to opt-out of the collection or use of your personal information. The opt-out option will be used for the collection of information of a less-sensitive nature, allowing for a sufficient period of time for the individual to exercise their right to disallow their consent.

In recognition of the donor dollars required to fund our programs, and the cost of providing express consent forms in all of our fundraising materials, HDI will, for fundraising purposes, operate under the “opt-out method” as the method of consent. Subject to legal requirements, HDI understands and will comply with your right to withdraw your consent to the collection, use or disclosure of personal information at any time. HDI maintains an internal do-not-call list that applies to all our fundraising activities.

5. Personal information from minors

If HDI knowingly collects any personal information from any person under the age of majority in his/her province or territory of residence, then HDI requests the permission of a parent or legal guardian. Without the express permission of a parent or legal guardian, HDI does not use such information.

6. Limiting the collection of information

Only that personal information which we have acknowledged as required for operational or programing purposes will be collected by our organization. Each individual will choose what information to share with HDI and for what purposes we may use this information. We only collect information fairly and lawfully, and directly from individuals. Each person has the right to provide as much or as little personal information as you choose to share. In certain circumstances personal information can be collected, used, or disclosed without the knowledge and consent of the individual. For example, legal, medical, or security reasons may make it impossible or impractical to see consent. Seeking consent may be impossible or inappropriate when the individual is a minor, seriously ill, or mentally incapacitated. In addition, if HDI does not have a direct relationship with the individual, it may not always be able to seek consent. For example, seeking consent may be impractical for a charity or a direct marketing firm that wishes to acquire a mailing list from another organization. In such cases, the organization providing the list would be expected to obtain consent before disclosing personal information.

7. Limiting use, disclosure and retention of collected information

Personal information will be retained as long as it is required to satisfy the intended purpose, and in compliance with any laws surrounding information retention. If all identified purposes for the use of personal information collected have been exhausted, we will destroy the information or render it



unidentifiable to any specific person. All purposes for which we intend to use your personal information will be disclosed to you and should we identify a new situation requiring the use of your information, we will contact you prior to information being used with a view to gaining your consent.

8. Accuracy of your personal information

Aside from third party fund-raising lists, practically all personal information that we collect comes directly from individuals themselves, for example; on our donations forms or subscription request forms, in telephone conversations, through donor correspondence, registration in a contest or program or a transaction through our online store. Unless we are advised differently, we will generally assume this information to be accurate and complete. Although we do not regularly or routinely update personal information which has been provided to us, we do ensure opportunities exist for individuals to update their own personal information on an ongoing basis.

9. Visiting HDI web sites and the use of cookies

With respect to its web sites, HDI collects information from site visitors through the use of cookies. "Cookies" are files or pieces of information that may be stored in your computer's hard drive when you visit any of our web sites. Cookies are also used to remember that you may have already provided personal information to us and as a result, they help speed up your future activities when accessing any of our web sites. The cookies are persistent cookies and reside on your Internet browser for six (6) months. HDI does not share personal information obtained through cookies with any third parties that do not agree to use such information solely for the purposes of providing services to HDI and under the instruction of HDI and, with respect to that information, to act in a manner consistent with the relevant principles articulated in this Policy Statement.

Most Internet browsers are initially set to accept cookies. If you do not wish to accept cookies, you can set yours to refuse cookies or to alert you when cookies are being sent. Please refer to your software manual or Internet provider for instructions.

In some instances, you may have received a unique Client ID and created a password in order to use the secure portions of an HDI web site. You are requested not to divulge your Client ID or password to anyone other than HDI personnel (e.g. Customer Service assistance, if provided) and then only for the purpose of permitting them to provide service to you.

In addition to personal information you provide and cookies, HDI may collect other information about your visits to our web sites. For example, we may collect information about your computer, such as your IP address (a number assigned to your computer whenever you surf the World Wide Web); the type of Internet browser you are using; the type of computer operating system you are using; or the domain name of the web site from which you linked to our Websites. This information will not be linked to your personal information and will only be collected in the aggregate in connection with all the users of our Websites for planning, forecasting and/or evaluation purposes.

HDI has no control over the content of third party web sites that may be identified on the HDI web site or, if applicable, accessed through hyperlinks.



10. Safeguards for your personal information

All means possible are used to protect and guard personal information on file with HDI. Access to information is limited to those with a “need to know”, all employees and volunteers in the employ of HDI are trained on the issue of privacy – its meaning and importance, and as well, all files whether “soft” (meaning electronic) or “hard” (meaning paper) are maintained in secure locations. Our Privacy Officer will screen and verify access to personal information. Any and all suppliers contracted by HDI are required to acknowledge their compliance to PIPEDA.

11. Openness of our privacy policy and procedures

Transparency is a way of operating for HDI. Our policies and procedures are documented and open to all individuals. We will endeavour to communicate this Policy Statement and all related procedures, to the best of our ability, to all those individuals providing us with their personal information.

12. Right to access personal information

At any time, you are entitled to view your personal information on file with HDI. Upon receiving a request from you, we will advise you of the purpose for which it was collected, the disposition of the information and, if it has been disposed, how we did this. In order to access your personal information we may have on you, please send your written request to HDI’s Privacy Officer at our National Office, The Historica-Dominion Institute, 2 Carlton Street, East Mezzanine, Toronto, ON M5B 1J3. Please be sure to include as many details as possible to facilitate the processing of your request in a timely manner.

13. Your right to challenge

Our Privacy Officer can be contacted at any time should you be concerned about our not complying with our stated Privacy Policy. Your comments are always appreciated.

14. Amendment of HDI Practices and This Policy

This statement is in effect as of January 1, 2011. HDI will from time to time review and revise its privacy practices and this Policy Statement. In the event of any amendment, an appropriate notice will be posted on HDI web sites. Policy changes will apply to the information collected from the date of posting of the revised Policy Statement to HDI’s web site as well as to existing information held by HDI.