



Privacy Policy

Strong Start® Charitable Organization is committed to protecting the privacy of the personal information of its employees, volunteers, members, children, parents/guardians, donors, partners and other stakeholders, by following responsible information handling practices in keeping with privacy laws. We value the trust of those we deal with, and of the public, and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the information that you choose to share with us.

During the course of our various projects and activities, Strong Start frequently gathers and uses personal information. Anyone from whom we collect such information should expect that it will be carefully protected and that any use of, or other dealing with this information, is subject to consent. Strong Start's privacy practices are designed to achieve this.

Strong Start uses current information and communication technologies to support our Strong Start activities. Our Privacy Policy covers Strong Start Charitable Organization and our websites.

Defining personal information

Personal information is any information that can be used to distinguish, identify or contact a specific individual. This information can include an individual's opinions, as well as facts about, or related to, the individual. Exceptions: business contact information and certain publicly available information, such as names, addresses and telephone numbers as published in telephone directories, are not considered personal information.

Information in the public domain is not subject to privacy legislation and as such is not included in this policy.

Where Strong Start employees, volunteers, members, children, parents/guardians, donors, partners and other stakeholders use home contact information as business contact information, Strong Start considers that the contact information provided is business contact information, and is not therefore subject to protection as personal information.

We consider donor and volunteer information always to be personal information, and do not disclose information without consent.



Strong Start observes the following practices when collecting, maintaining and using personal information:

Consent

An individual's consent is required regarding the collection and proposed use of personal information when information is collected. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from an individual's action or inaction. An individual's consent is required before confidential information is released to outside parties. The type of consent is related to nature of the information collected and its intended purpose.

We collect personal data as part of our operational practices, such as program and volunteer registration, training, and events, in order to better meet your program, service and information needs. We also use and disclose data, which does not identify individuals, for evaluation purposes to develop and enhance Strong Start programs and services.

Limited Collection

The collection of personal information is limited to that which is relevant and necessary to our programs and fundraising efforts. Strong Start shall not make unwarranted or intrusive inquiries into a donor or prospect's gift history or personal life. Strong Start attributes all data that it collects.

Limited Use, Disclosure and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Additional consent will be requested in order to provide stories to media, research and other public relations work. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

Accuracy

Personal information shall be as complete, accurate and up-to-date as possible. Personal information that is collected, used and disclosed by Strong Start is provided by individuals and is updated by Strong Start when requested by the individual. If an individual's personal information requires amendment, they may contact Strong Start using the contact information



provided at the end of this Privacy Policy. Donors are encouraged to review, correct and update personal information.

Security Safeguards & Confidentiality

Personal information gathered by Strong Start shall be kept in confidence. Strong Start personnel shall be authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained.

Appropriate physical and electronic measures shall be used to ensure personal information is secure. Access to donor and volunteer records shall be limited to those who require such information to fulfil their job responsibilities. Special protection shall be given to all records pertaining to anonymous donors. The confidentiality of donor and volunteer records shall continue after the relationship with the individual has ended.

Donors who request that their name and/or the amount of the gift not be publicly released shall remain anonymous.

Strong Start maintains physical, electronic and administrative safeguards that are appropriate to the type of personal information we obtain from you. Strong Start staff and volunteers with access to personal data are required to respect the confidentiality of personal information and handle it responsibly.

Openness

Upon request, individuals shall be provided with the information on their personal participant, donor, staff and/or volunteer record.

Further information on privacy and your rights in regard to your personal information may be found on the website of the Privacy Commissioner of Canada at www.priv.gc.ca.

Ongoing Relevancy

Strong Start regularly reviews its policies and procedures to ensure we remain current with changing laws.



Cookies

Strong Start's websites use persistent cookies within visiting browsers to enable the functions of the website and for tracking performance. Specifically, cookies are used the following ways:

- Preserving and expiring visitor sessions on the site (e.g. preserving data between steps of a process; and ending the session after a period of inactivity)
- Storing font size preferences on the site
- Enabling web analytic tools (such as Google Analytics – see below)

Cookies are used anonymously and without storing Personally Identifiable Information (PII). Visitors that wish to opt-out of cookies should review the help documentation for their browser software to decline or selectively decline cookies. Note that declining cookies may adversely impact site performance.

Strong Start's websites may contain links to other websites owned and operated by third parties. While we attempt to ensure that these organizations adhere to similar privacy policies, we are not responsible for the content or privacy practices of such websites. It is highly recommended that you review the privacy policies of other sites prior to providing any personal information on those sites.

Google Analytics

This website uses [Google Analytics](#) to track performance. Google Analytics uses [persistent cookies](#) to track visitor sessions, visitors across multiple sessions, and referral sources to our sites. We also track the performance of promotional links to our site using Google Analytics. In compliance with the [Google Analytics Terms of Service](#), at no time is personally identifiable information (PII) passed to Google Analytics. Note that Google Analytics stores its data within the United States of America and is subject to US laws. We use this data to understand site performance to serve you better. Those wishing to opt out of Google Analytics data collection should use the [Google Analytics Opt-out Browser Add-on](#).



Learning more about Strong Start's Privacy Policy

The most up-to-date version of this Privacy Policy is available on Strong Start's website www.strongstart.ca. This policy is also available in hardcopy at the Strong Start provincial office, a copy of which can be requested by contacting:

Strong Start® Charitable Organization
20 Crestview Place
Kitchener, ON N2B 0A2

Phone: (519) 743-9578
Fax: (519) 744-1997
Email: info@strongstart.ca

Concerns about personal information held by Strong Start

If individuals have a concern related to Strong Start's Privacy Policy, they can contact the Executive Director in writing using the above contact information. If the Executive Director is unable to resolve the concern, or if there are further questions, individuals may contact the Privacy Commissioner of Canada at www.privcom.gc.ca or at:

112 Kent Street
Ottawa, ON K1A 1H3

Phone: (613) 995-8210
Toll free: 1-800-282-1376
Fax: (613) 947-6850
Email: info@privcom.gc.ca

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