

YES Privacy Policy



Approved by the Board of Directors, November 29, 2021

Compliant with: ***Personal Information Protection and Electronic Documents Act (PIPEDA)***

Using Canadian Standard Association's Model Code for the Protection of Personal Information.

Reflects the Employment Ontario Privacy Tip Sheet.

Introduction

Protecting the privacy of an individual's personal information is very important to YES¹. All employees will treat personal information² with the utmost respect, and in accordance with this Privacy Policy which reflects current privacy legislation. This policy applies to the personal information of clients, employees, members of the Board of Directors, other volunteers, employers, individual donors and visitors to the YES website.

Openness

1. Through the implementation of this privacy policy YES aims to:
 - Ensure awareness of information policies and practices
 - Get informed consent from the individual
 - Establish the relevance and necessity of the information collected
 - Establish the uses of the information, and the plan to destroy it
 - Identify the person who is responsible for protecting the information
 - Maintain accuracy and completeness of records³

Limiting Collection

2. To ensure fair information practices when collecting personal information YES employees will ensure that they are collecting only the required personal information and keeping it in a secure location.

Awareness

3. The YES privacy policy will be posted in a publicly frequented part of the building and on the YES website. The policy will also be explained when personal information is being collected and a copy of the policy provided on request.

¹ Privacy of information refers to the right of the individual to determine when, how and to what extent they will share personal information about themselves.

² Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as: age, name, ID numbers, income, ethnic origin, blood type, opinions, evaluations, comments, social status, disciplinary actions, employee files, credit records, loan records, medical records, existence of a dispute between a consumer and a merchant, intentions (for example, to acquire goods or services, or change jobs). Personal information does not include the name, title, business address or telephone number of an employee of an organization. Personal Information Protection and Electronic Documents Act, Privacy Commissioner of Canada, December 2000.

³ Fair information principles outlined in Privacy Impact Assessment. A User's Guide. Management Board Secretariat. Government of Ontario, June 2001.

Consent

4. Personal information will be collected, used and disclosed with the consent of the individual. The nature of that consent will be appropriate to the sensitivity of the information being collected.
5. YES clients are required to complete consent forms, and releases under certain circumstances.
6. YES volunteers are required to complete consent forms.
7. Implied consent is given by Board members, employers and individual donors when agreeing to provide the information.

Identifying Purposes and Limiting Use

8. At the time of collecting personal information the use and disclosure of the information will be made clear.
9. YES uses personal information for the following purposes:
 - a) In order to provide services
 - b) Contact information for communication with individuals, including information about YES, updates, invitations and fundraising appeals
 - c) Name, address, profession/vocation, date of birth, phone number, e-mail address of the current members of the Board of Directors for legal purposes and for reporting to Revenue Canada, funders and others
 - d) Names of the current members of the Board of Directors are listed on the YES website and Annual Report for public information and in other reports as required.
 - e) In conjunction with the above purposes, YES may disclose personal information of clients to referring agencies, education and training organizations, other community services associated with YES, and program funder representatives for the sole purpose of assisting the client to find employment, training or education.
10. YES may use comments submitted by users about the YES services for promotional or funding purposes. YES will seek written permission of the user before publishing personal identifying information in association with the comments.

Disclosure

11. YES does not disclose information to others outside the organization, or sell, trade, or rent individual personal information to others.

Accountability

12. The Privacy Officer is responsible for ensuring that hardcopy personal information will be maintained in a secure location in a locked cabinet and protected against theft, unauthorized access, disclosure without consent, copying and modification. YES also employs other

organizational (employee policies), technological (passwords) and physical (restricted access) measures to ensure that personal information is properly safeguarded. The level of safeguards used is appropriate to the sensitivity of the information. The Privacy Officer may, from time to time, designate an employee as the person responsible for implementing the terms of this policy.

13. Consent for use or disclosure of personal information may be withdrawn, by contacting the YES Privacy Officer. YES will explain the ramifications of that withdrawal of consent which may affect the ability of YES to provide the services being requested or make it impossible for a person to continue with certain volunteer activities.

14. The YES Privacy Officer may be contacted at:

Youth Employment Services YES -555 Richmond Street West, #711, Toronto, ON M5V 3B1 (416) 504-5516

Safeguards

15. Hardcopy documents containing client, employee and other stakeholder personal information will be kept in locked filing cabinets.

16. Internet e-mail is vulnerable to interception and forging. YES strives to ensure confidentiality in e-mail communication concerning client services and volunteer opportunities. Nevertheless, absent the use of encryption, the Internet is not a secure medium and privacy cannot be ensured. YES is not responsible for any damages suffered as a result of the electronic transmission of confidential information that is made to YES, or that YES is expressly or implicitly authorized to use, or for any errors or any changes made to any transmitted information.

Challenging

17. Complaints or inquiries about YES policies and practices relating to the handling of personal information should be directed at the YES Privacy Officer.

Accuracy

18. YES will use reasonable efforts to maintain individual personal information in an accurate, complete and up-to date manner.

Individual Access

19. Employees, members of the Board of Directors, other volunteers, clients, employers and individual donors may have access to their individual personal information held by YES at any time, given reasonable notice, to check for accuracy and completeness, and to change or challenge if necessary.

Retention

20. Individual personal information about members of the Board of Directors, other volunteers, employers and individual donors will be retained for a minimum of one year.

21. Individual personal information about clients will be retained for a minimum of seven years.

22. Annually after the required retention periods have passed, documents that are no longer current and contain personal information will be destroyed.
23. Documents containing personal information will be shredded when destroyed, not placed in a recycling bin.

Donor Information

We collect donor and member contact information (e.g., name, address, phone number, e-mail address) and information about donor/member history (e.g., history of giving; year membership was first obtained). YES, does not trade or sell any of its donor information. A list of donors is published in the YES Annual Report donors may remain anonymous if they wish.

Websites:

YES collects two basic types of information on the YES websites, personally identifiable information which is submitted by the user and information about the users interaction with the websites using digital markers such as cookies and web beacons. YES collects personally identifiable information when it is provided to YES by the user participating in certain activities that require response, registration or donations.

When a user visits a YES websites, YES also automatically logs information about the visit. The information collected about each visit includes, but is not limited to:

- The current Internet protocol (IP) address and the type of computer operating system of the user (e.g. Microsoft Windows or Mac OS)
- The type of browser (e.g. Firefox or Internet Explorer)
- The referring website that brought the user to the website
- the UDID (for mobile devices)
- The domain name of the user's Internet Service Provider
- The users activities while visiting the Website (e.g. which Web pages were viewed)

YES and its service providers use this information to analyze the performance and effectiveness of the website, for technical reasons to facilitate navigation through our website and to present personalized content.

YES also uses technical methods for tracking purposes, including clear gifs (also known as web beacons) in HTML emails that YES sends to determine whether a user has opened those emails and/or clicked on links in those emails. YES uses this information to analyze the performance and effectiveness of emails.

Changes to this Privacy Policy:

YES may at any time, without notice to anyone and in its sole discretion, amend this policy from time to time.