

## **Privacy Policy**

**Date: December 2019**

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Indspire is committed to protecting the privacy of personal information of its supporters, student scholarship and bursary applicants, award recipients and other stakeholders. Indspire values the trust of those we deal with, and of the public, and recognizes that maintaining this trust requires that we be transparent and accountable in how we treat the information that you choose to share with us.

In our quest to advance Indigenous educational achievement, we raise funds to help Indigenous learners achieve their full potential through education. To this end, we frequently gather and use personal information. Indspire complies with privacy best practices as reflected in Canada's federal *Personal Information Protection and Electronic Documents Act* and with all applicable privacy laws. The personal information of our stakeholders is always held in the strictest confidence.

### **What Personal Information do we collect?**

We collect and maintain different types of personal information about individuals with whom we interact which is relevant for purposes that a reasonable person would consider appropriate for a donor-charity relationship and for the other functions in which our organization engages. This includes:

- Contact and identification information, such as your name, address, telephone number(s) and email address;
- Donation information such as date of gift, amount of gift, appeal (the campaign you contributed to), name of spouse or partner if it was a joint gift; receipt number;
- Financial information such as your payment methods and preferences, billing and banking information (credit card number and expiry date or chequing account transfer numbers, whichever payment type you prefer to process your donation);
- Product and service-related information concerning the sale of Indspire branded merchandise that we provide to you;
- Contact information such as name, address, phone number, email addresses; academic transcripts, financial information; references; educational background; and statistical information such as age and gender;

- Education information, eligibility and application information, and/or personal financial information required to evaluate, award, and process a scholarship, bursary or award that you have applied for;
- Other personal information used for purposes that a reasonable person would consider appropriate given the circumstances.

When you visit our web site, we also collect aggregate data to better understand how our website is used, to make sure our information and dynamic content are served correctly, and to improve the performance of our site for our users, particularly the way search pages are delivered. Further information is available under the heading “Cookies”.

### **Why do we collect personal information?**

Indspire collects personal information to further its mandate of advancing Indigenous achievement through fundraising, public education and advocacy, as well as to establish, maintain and manage our relationship with you. Certain information is collected to satisfy the requirements of the Canada Revenue Agency. The main reasons we collect information from you are:

- To process donations and to conduct fundraising activities,
- To provide customer service relating to purchases, for example, processing your payment, or delivering your order;
- To evaluate, award, and process a scholarship, bursary or award for which you have applied;
- To perform program evaluations and research;
- To gain location information, feedback from programming, scholarship and bursary applications, history of interactions, other data collected for other areas identified herein;
- To inform you of and keep you up to date regarding our activities, successes, campaigns, and initiatives;
- To maintain our relationship and provide you with information about us;
- To carry out other purposes that are disclosed to you and to which you consent;
- To carry out any other purpose permitted or required by law or regulatory requirements.

### **How do we use your personal information?**

We will not, without your consent, use your personal information for any purpose other than described in this Privacy Policy, except where permitted or required by applicable law or regulatory requirements. As described above, we use your personal information for fundraising, to process donations, to evaluate, award, and process applicants’ scholarships, bursaries and awards, to respond to requests for information and to periodically keep you informed and up to date, including on Indspire’s successes in

advancing Indigenous achievement. In addition, if you choose via our website (indspire.ca) to subscribe to receive electronic communications from us, we will use your personal information to occasionally send you special offers and updates and service announcements relating to our website and activities, and to invite you to participate in surveys or contests.

### **Sharing of Personal Information**

Third party service providers may be engaged by Indspire to perform a variety of functions, including the mailing of brochures, processing your donation, filling your order, processing your scholarship or bursary, conducting research and providing technical services in maintaining our website and related computer services. These third-party providers have access to personal information if needed to inform the functions for which they are retained. However, we direct that those companies may only use such personal information for the purpose of performing their roles and may not use it for any other purpose or further disclose your personal information.

We may work with third parties for the purpose of delivering content and information to you on third party websites or platforms. For example, we may share personal information such as your name, postal address, email, or other identifier with third parties to allow them to match the personal information we hold with the information they hold, to better display information we think may be of interest to you on the third party site. This may include social media platforms including Facebook, whose Data Policy you may review at the following link

[https://www.facebook.com/full\\_data\\_use\\_policy](https://www.facebook.com/full_data_use_policy). If you would like more information on our practices in this regard or would like to ask us not to use or disclose your personal information in this manner, please contact our privacy officer using the information provided below.

Some of our third-party service providers could be located outside Canada and may be subject to the laws of the foreign jurisdiction in which they are located. As a result, this information may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to laws in those jurisdictions.

In all cases, when personal information is shared with third party service providers, Indspire will demand reasonable assurance that third parties will protect your information in conformity with our privacy practices.

We reserve the right to transfer any personal information we have in the event that we merge with or are acquired by a third party or should any such transaction be proposed. We may also use, or disclose personal information to third parties, if we have reason to believe that using or disclosing such information is necessary to: (i) conduct investigations of possible breaches of law; (ii) identify, contact, or bring legal action against someone who may be violating an agreement they have with us; (iii) investigate security breaches or cooperate with government authorities pursuant to a legal matter; or (iv) to protect our rights, safety or property.

## **How do we obtain your consent?**

When you provide us with personal information for any of the reasons described in this policy, we assume you consent to our collecting it and using it for that reason, or as allowed or required under the law.

## **Privacy Practices**

Personal information gathered by Indspire is kept in confidence. Our staff are authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained, or as may be permitted or required by law or regulatory requirements. Safeguards are in place to help ensure that the information is not disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered. We also take measures to help ensure the integrity of this information is maintained and to prevent its being lost or destroyed. We manage the personal information we collect from our offices at Six Nations of the Grand River and Toronto, both in Ontario.

Although we have taken measures to help protect any personal information that we have collected from unauthorized use, access, disclosure, misuse, alteration or destruction, no security measures can provide absolute protection. We cannot ensure or warrant the security of any information you provide to us.

We collect, use and disclose personal information only for purposes that a reasonable person would consider appropriate in light of the circumstances. Our stakeholders are given opportunities to choose how often and in what way they wish to hear from us. At any time, our supporters and other stakeholders may opt out of receiving materials or solicitations. Our supporters may also opt out of having their information used or shared for purposes beyond those for which it was collected.

## **Filming and Photography**

When you enter an Indspire event or program, you enter an area where photography, audio, and video recording may occur.

By entering the event premises, you consent to interview(s), photography, audio recording, video recording and its/their release, publication, exhibition, or reproduction to be used for news, web casts, promotional purposes, telecasts, advertising, including on websites, social media, or any other purpose by Indspire, its affiliates and representatives and persons acting at its instruction or for its benefit. Images, photos and/or videos may be used to promote Indspire events in the future, highlight the event and exhibit the capabilities of Indspire. You release Indspire, its officers and employees, and each and all persons involved from any liability connected with the taking, recording, digitizing, or publication and use of interviews, photographs, computer images, video and/or sound recordings, including the use of your image, likeness, voice, and/or comments as may be included therein.

By entering the event premises, you waive all rights you may have to any claims for payment or royalties in connection with any use, exhibition, streaming, web casting, televising, or other publication of these materials, regardless of the purpose or sponsoring of use, exhibiting, broadcasting, web casting or other publication, irrespective of whether a fee for admission or sponsorship is charged. You also waive any right to inspect or approve any photo, video, or audio recording taken by Indspire or the person or entity designated to do so by Indspire.

You have been fully informed of your consent, waiver of liability, and release before entering the event.

### **Website and Electronic Commerce**

Our website is operated by Indspire for the benefit of our supporters and other stakeholders.

All personal information, such as email addresses and financial information, collected on the Indspire website is knowingly and specifically supplied to us by the website user. We use password protocols and encryption software to protect personal and other information we receive when a product or service is requested and/or paid for online.

All personal information related to credit card information is encrypted using Secure Socket Layer (SSL) 128-bit encryption. Known as USA/Canada grade encryption, SSL 128-bit encryption is currently the strongest export-grade encryption available. Indspire does not retain credit card information after the completion of an online transaction.

### **Children**

For website users under 18 or the age of majority where you live, please be sure to obtain your parent or guardian's permission before you send any information about yourself (your name, address, email, address, etc.) to us or anyone else over the internet. We encourage parents to get involved with their children's online usage and to be aware of the activities in which they are participating. If you are the parent or guardian of a minor child that has provided us with personal information, you may contact us for the purpose of asking we delete this information.

### **Cookies**

Like many other websites, we use cookies to better understand how our website is used, to make sure our information and dynamic content are served correctly, and to improve the performance of our site for our users, particularly the way search pages are delivered. Indspire does not use cookies to retain personal information about our users, and we do not sell information about our traffic patterns. Aggregated site usage data may be provided to our sponsors and underwriters.

Your browser may give you the option to reject cookies. However, setting your browser to reject cookies generally hinders the browser's performance and may adversely affect your experience while using our website.

## **External Links**

There are links on the Indspire website that take you to other websites outside of our control. Any links provided to third party websites outside of indspire.ca are provided solely for your convenience. The operation and content of such third-party websites is beyond our control, and we do not endorse in any manner whatsoever or accept any responsibility for the content or other material that may be contained on such websites, the use of such websites, the practices of such websites, including without limitation, with respect to your personal information, or any products or services advertised on or sold through any such websites. We will not be liable under any circumstances for any damages whatsoever, direct or indirect, resulting from any use of this website or any other third- party website linked to this website.

## **Accessing and Correcting your Personal Information**

You may request access to the personal information we hold about you and request a correction to it if you believe it is inaccurate. If you have submitted personal information to us and would like to have access to it, or if you would like to have it corrected, please contact us using the contact information provided below. We will use reasonable efforts to comply with your request; however, in some cases we may not be able to allow you to access certain personal information in certain circumstances, for example if it contains personal information of other persons, or for legal reasons. We may require you to verify your identity before we allow you to access your personal information.

## **Updating of Privacy Policy Statement**

We regularly review our privacy practices for our various activities, and update our policy. Please check the Indspire website on an on-going basis for information on our most up-to-date practices. Your continued use of this site, or submission of personal information to us following the posting of changes to this policy will mean you accept those changes.

## **How do I get more information?**

If you would like more information about our privacy policies, or you would like to see exactly what personal information we have about you in our records, correct your personal information, or if you wish to “opt out” of receiving communications or register a complaint, please contact:



Cliff Fregin  
Chief Operating Officer / Privacy Officer  
Indspire

direct: 519-445-  
1.855.463.7747 X 260  
cfregin@indspire.ca

You may also contact the Privacy Commissioner of Canada for assistance:  
1.800.282.1376 or 613.995.8210  
Fax: 613.947.6850  
TTY: 613.992.9190  
112 Kent Street  
Place de Ville, Tower B, 3rd Floor  
Ottawa, Ontario, K1A 1H3