



PRIVACY POLICY

Preamble

HeroWork Canada and its local chapters are a registered Canadian charity in good standing. Donations may be directed to the “HeroWork Program Society” and when applicable, a Canadian tax-deductible receipt will be issued by HeroWork Canada (Charitable No. 84119 8583 RR0001).

Our Commitment

HeroWork Canada recognizes the value of its relationships with potential donors, existing donors, sponsors, volunteers, and employees, and is committed to respecting and protecting their personal information. We value the trust of the public and those we deal with and recognize that maintaining this trust requires transparency and accountability in our treatment of the personal information that is entrusted to us.

To ensure balance between an individual’s right to protect his/her personal information, and our need to collect, use or disclose personal information for reasonable business purposes, HeroWork Canada complies with British Columbia’s Personal Information Protection Act (PIPA).

Since Canadian privacy legislation and PIPA are based on the 10 principles that comprise the Canadian Standards Association Model Privacy Code, our privacy policy adheres to these principles, as set out in this policy.

Definition of Personal information

Personal information means recorded information about an identifiable individual other than contact information and work product information.

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. Types of personal information collected and held by HeroWork Canada include: name, home address, email address, phone numbers, banking information and employee files.

POLICY

1. Accountability

An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization’s compliance with the following principles.

Accountability for HeroWork Canada’s compliance with privacy legislation rests with the designated Privacy Officer. The name and contact information of the Privacy Officer will be

made available to individuals through HeroWork Canada's website, its Privacy Statement or upon contacting HeroWork Canada (see last page of this document).

We are responsible for personal information in our possession, including information that has been transferred to a third party for processing. In cases where such transfers take place, we ensure that the third party has comparable privacy safeguards in place.

2. Identifying Purposes

The purposes for which personal information is collected shall be identified by HeroWork Canada when or before the information is collected.

We may collect, use, store, disclose or transfer different kinds of personal information about you which are grouped together as follows:

- (1) Identity personal information includes:
 - username and similar identifier,
 - first name, last name, title, company you work for, and in the case of individuals representing charity sponsors who engage our service, your job title, role and/or level of experience.
- (2) Contact personal information includes address, email address, telephone numbers, and emergency contact name and number.
- (3) Financial personal information includes bank account, credit card details and securities related information in the event you donate securities or mutual funds to HeroWork Canada (including our mutual fund name or security name, number of units, investment firm, account number, financial advisor name, email and phone number).
- (4) Transaction personal information includes details about payments to you (refunds) and from you (donations) and purpose of products (such as HeroWork line of clothing).
- (5) Technical personal information includes internet protocol (IP) address, your login personal information, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
- (6) Profile personal information includes your username and password, donations made by you, your interests, preferences, surveys, and feedback.
- (7) Usage personal information includes information about how you use our website and our services.
- (8) Applications for Radical Renovations which includes your first and last name, contact information, data related to your charity's financial situation and leadership capacity.

- (9) Marketing and Communications personal information includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- (10) Registration Form is completed by every new HeroWork volunteer. This form requires the volunteer's name, address, telephone number, trade, emergency name and contact information.
- (11) Volunteer Waiver for each project work that includes your first and last name. This document also gives HeroWork permission to take photographs and/or video of you, and to use these photographs and/or video with or without your name for any lawful purpose including publicity, illustration, advertising and web contact.
- (12) Safety Orientation includes the date you participated in on-site Safety Orientation sessions, received the daily Task Hazard Assessment Review, when you checked-in and checked out in order to calculate volunteer hours worked and who is on site in the event of an emergency.
- (13) First Aid Reports includes first and last name and description of your illness, injury or exposure and the treatment given.
- (14) Volunteer and/or Charity Partner Survey results if you included your first name and/or last name or contact information such as email address or telephone number. This also includes special projects like Needs Assessment Surveys which include similar information but also information related to the condition of your building.
- (15) Volunteer Recognition Events if you responded to an invitation to attend an event we will have your first and last name.

We also collect, use, and share aggregated personal information such as statistical or demographic information for any purpose. Aggregated personal information could be derived from your personal information but is not considered personal information by law as this information will not directly or indirectly reveal your identity. For example, we may aggregate your usage personal information to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated personal information with your personal information so that it can directly or indirectly identify you, we treat the combined information as personal information which will be used in accordance with this Privacy Policy.

We do not collect any special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric information). Nor do we collect any information about criminal convictions and offences.

If you provide HeroWork Canada with personal information about another individual you represent, HeroWork Canada will assume that you have obtained all the necessary consents from such person to enable us to collect, use and disclose such personal information for the purposes set forth in this Privacy Policy.

This website is not intended for children under the age of 16 and we do not knowingly collect personal information relating to children. Parents or Guardians of youth under the age of 18 are required to sign a consent from agreeing to allow their child or ward to volunteer for HeroWork. The form includes the relationship between the Parent or Guardian and does not include the name or contact information of the youth these conditions we collect information of youth.

3. Consent

The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except where inappropriate.

We use different methods to collect personal information from and about you including through:

- (1) Direct interactions. You may give us Identity, Contact, Transaction and Financial Information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:
 - (a) Sign-up for an account and update your account;
 - (b) Register to volunteer;
 - (c) Sign-up for a volunteer shift;
 - (d) Make a donation (including one-time gifts, recurring gifts, gifts of securities, and donations made to purchase items from the HeroWork clothing line) and receive a tax receipt, if applicable;
 - (e) Subscribe to our services or publications or to contact us or provide feedback;
 - (f) Request marketing to be sent to you; or
 - (g) Give us feedback or contact us.
- (2) Automated technologies or interactions. As you interact with our website, we will automatically collect technical personal information about your equipment, browsing actions and patterns. We collect this personal information by using cookies, pixels, server logs, and other similar technologies. We may also receive technical personal information about you if you visit other websites employing our cookies.
- (3) Third Parties or publicly available sources. We will receive personal information about you from various third parties as set out below:
 - (a) Technical Personal Information from:
 - (i) Analytics providers such as Google Analytics;

- (ii) Digital marketing service platforms or CRMs such as iContact, Salesforce, MailChimp, Sprout Social and Hootsuite;
 - (iii) Advertising networks such as Google AdWords DoubleClick, Facebook, and Twitter. We may use unique tracking codes in our emails and pixels on our website to allow us to share your technical information with such providers to track use of our site (including performance of our ads) and to re-target ads.
- (b) Contact, Financial and Transaction personal information from providers of technical, payment processing and delivery services. Securities or mutual fund donations are processed by a broker.

4. Limiting Collection

The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where you consent to such collection and use, such as by consenting to this Privacy Policy.
- Where needed to perform the services you are requesting.
- Where we perform donor and volunteer management services.
- Where we need to comply with a legal obligation.

HeroWork Canada will determine the minimum amount of personal information that is necessary and reasonable to fulfill the purposes identified in section 2, and collect this limited personal information by lawful means. HeroWork Canada will not intentionally mislead individuals about the purposes for which personal information is being collected.

5. Limiting 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. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

Note that we may process your personal Information for more than one lawful basis depending on the specific purpose for which we are using your personal information. Please contact us if you need details about the specific legal ground we are relying on to process your personal information where more than one ground has been set out in the table below.

Table: Purposes for Which we will use your Personal Information

PURPOSE/ACTIVITY	TYPE OF PERSONAL INFORMATION	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST	WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH FOR THESE PURPOSES?
<p>To make a donation, including one-time and monthly monetary donations, and donations of securities and mutual funds and receive a charity tax receipt, if applicable. This also includes sponsorship as well as in-kind labour and/or goods donations</p>	<ul style="list-style-type: none"> • Identity • Contact • Financial Information • Transaction 	<ul style="list-style-type: none"> • Performance contract with you (e.g., facilitating your donation in according to your directive • Necessary for our legitimate interests (to recover funds due to us) 	<ul style="list-style-type: none"> • We share your Financial personal information only with our third-party processor or broker, depending upon the donation.
			<ul style="list-style-type: none"> • We share this information, except Financial personal Information, with charity partners you have selected to benefit from your donation unless you were provided the option to remain anonymous to the charity and you selected that option when making the donation. • If you make a donation through a page created by a Team or Individual to fundraise for a charity, we share your name and email with page owner so they

PURPOSE/ACTIVITY	TYPE OF PERSONAL INFORMATION	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST	WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH FOR THESE PURPOSES?
To make a donation continued...			can thank you for your contribution; we only share your name, donation amount, and/or message to the fundraiser publicly on the platforms if you provide us explicit (verbal or written) consent to do so.
To sign-up for a volunteer or donor account and update your account.	<ul style="list-style-type: none"> • Identity • Contact 	Performance of a contract with you	<ul style="list-style-type: none"> • We do not share your personal Information for this purpose unless you provide your Financial personal Information, in which case we share this information with our third-party payment processor or Customer Relationship Management.
To enable automatic or fast donation processing for future one-time and/or recurring donations.	<ul style="list-style-type: none"> • Identity • Contact • Profile 	<ul style="list-style-type: none"> • Performance of a contract with you. • Necessary for our legitimate interests (for marketing purposes). 	<ul style="list-style-type: none"> • We do not share this information for this purpose.

PURPOSE/ACTIVITY	TYPE OF PERSONAL INFORMATION	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST	WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH FOR THESE PURPOSES?
<p>To improve the performance of our marketing programs, and to deliver relevant content and advertisements to serve you better and grow charitable giving.</p>	<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Marketing and Communications • Technical 	<ul style="list-style-type: none"> • Where your personal information is completely anonymized, we do not require a legal basis to use it as the information will no longer constitute Personal information that is regulated under privacy protection laws. 	<p>We share your personal information with a variety of third-party analytics and digital marketing service providers to assist us with these activities such as Google Analytics, SproutSocial, Google Adwords, MailChimp, Salesforce, Facebook, and other platforms.</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<ul style="list-style-type: none"> • Identity • Contact • Technical 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise). • Necessary to comply with legal obligation. 	<ul style="list-style-type: none"> • We do not share your personal information for this purpose.

Social Media

HeroWork Canada uses Facebook, Instagram, Twitter, Linked-In, and other networks to communicate with the general public about its programs, services and renovations, to acknowledge sponsors, donors and volunteers, and to share news relevant to our business.

Marketing

We strive to provide you with choices regarding certain personal information uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Personal Information to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which Services may be relevant for you.

Where Canada's Antispam Legislation (CASL) applies to HeroWork Canada's communications with users, donors, or volunteers, HeroWork Canada is committed to complying with CASL and, in particular, the provisions setting out the requirements for sending commercial electronic messages.

Note: CASL

- Getting consent to send email
- Securing our computers, devices, and networks to prevent spam
- CASL implied consent provisions may apply to charitable and non-profit organizations as well as businesses. <https://www.fightspam.gc.ca/eic/site/030.nsf/eng/00009.html>

You will receive marketing information from us if you have requested information from us or made a donation to us, and you have not opted out of receiving that marketing. You always have the option to opt out.

You can also ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, we may continue to use your personal information in order to provide you with the services you have requested from us.

Where our use of your personal information requires your consent, you can provide such consent:

- At the time we collect your personal information following the instructions provided; or
- By informing us by e-mail, post or phone using the contact details set out in this Privacy Policy; or
- By registration through our website.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

Change of Purposes

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

International Purposes

By providing us with personal information, you acknowledge and agree that your personal information may be processed in other countries, including the United States, where laws regarding processing of personal information may be less stringent than the laws in your country. Where necessary to make such transfers, we will comply with our legal and regulatory obligations in relation to the personal information. This will include putting appropriate contractual safeguards in place to ensure an adequate level of protection for the personal information. Please contact us if you want further information on the specific mechanism used by us when transferring your personal information out of Canada.

How do we Protect the Confidentiality and Security of Your Personal Information?

We are committed to keeping the personal information provided to us secure and we will take reasonable precautions to protect personal information from loss, misuse, or alteration.

We have implemented commercially reasonable information security policies, rules and technical measures that are intended to protect the personal information that we have under our control from:

- Unauthorized access;
- Improper use or disclosure;
- Unauthorized modification; and
- Unlawful destruction or accidental loss.

How Long will we Retain Your Personal Information?

We will only retain your personal information for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal information for a longer period of time in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

In some cases, you can ask us to delete your personal information; See your Legal Rights Section below, for further information.

In some circumstances we will anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your Legal Rights

The vast majority of our donors and website users are Canadians and so our Privacy Policy has been drafted to help ensure compliance with applicable Canadian Law. However, we have noted that (although we do not target our services to EU data subjects) some of our individual donors are from outside Canada, possibly from the European Economic Area (EEA). For the benefit of such users we also endeavour to provide adequate protection for the personal use of data of EU data subjects in accordance with applicable EU data protection laws and regulations, including the EU General Data Protection Regulation. Subject to certain exemptions, you have the following rights in relation to the personal information we hold about you:

(a) Your Right of Access

If you ask us, we will confirm whether we are processing your personal information and subject to, any applicable exemptions, provide you with a copy of that personal information within the timescales provided for by law. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. If you require additional copies, we may need to charge a reasonable fee.

(b) Your Right to Erasure

You can ask us to delete or remove your personal information in some circumstances such as we no longer need it or if you withdraw your consent (where applicable because that was the legal basis on which we were processing your personal information). If you are entitled to erasure and if we have shared your personal information with others, we

will take reasonable steps to inform those others where possible and where this would not involve disproportionate effort. If you ask us, where it is possible and lawful for us do to so, we will also tell you who we have shared your personal information with so that you can contact them directly.

(c) Your Right to Restrict Processing

You can ask us to “block” or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or you object to us. If you are entitled to restriction and we have shared your personal information with others, we will let them, know about the restriction where possible for us to do so. If you ask us, where possible and lawful for us to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

(d) Your Right to Personal Information Portability

You can have the right, in certain circumstances, to obtain personal information you have provided us with (in a structured, commonly used and machine readable format) and to reuses it elsewhere or to ask us to transfer this to a third party of your choice.

(e) Your Right to Object

You can ask us to stop processing your personal information, and we will do so, if we are

- Relying on our own or someone else’s legitimate interest to process your personal information, except we can demonstrate compelling legal grounds for the proceedings; and
- Processing your personal information for direct marketing.

(f) Your Rights in Relation to Automated Decision-Making and Profiling

You have the right not to be subject to a decision when it is based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

(g) Your Right to Withdraw Consent

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products, services, opportunities, or info to you. We will advise you if this is the case at the time you withdraw your consent.

5. Limiting 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. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

We may share your personal information with the parties set out above for such purposes set out in the table Purposes for Which we will use your personal information in this Policy.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow third-party service providers to use your personal information with their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

6. 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.

HeroWork Canada will use its best efforts to ensure that personal information in its custody and control is accurate, complete and up-to-date. This includes information that is used on an on-going basis, is disclosed to third parties, and is used to make decisions about an individual (such as a giving recognition category).

If you are entitled to rectification and if we have shared your personal information with others, we will let them know about the rectification where possible and where this would not involve a disproportionate effort. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with.

To request corrections to your personal information, you must notify HeroWork Canada in writing. Reasonable corrections will be made as soon as possible.

7. Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

HeroWork Canada is obligated to protect individual's personal information by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure, or disposal. Security measures have been integrated into the day-to-day operating practices of HeroWork Canada.

Through privacy training, we are making our employees aware of the importance of maintaining the confidentiality of personal information, and we exercise care in the disposal and destruction of personal information to prevent unauthorized parties from gaining access to it. All employees and volunteers having access to personal information are required to sign a Confidentiality Agreement.

Our methods of protection include physical safeguards (e.g., locking file cabinets), administrative safeguards (limiting access on a “need to know” basis) and technological safeguards (e.g., the uses of security passwords and two-factor authentication).

Third parties are expected to safeguard personal information entrusted to them in a manner consistent with the policies of HeroWork Canada and are required to sign a Confidentiality Agreement as part of all contracts. Examples of third parties include direct mailing and email marketing services or data analysis providers or software consultants.

8. Openness

An organization shall make readily available to an individual’s specific information about its policies and practices relating to the management of personal information.

HeroWork Canada will be open about its privacy policies and procedures with respect to the management of personal information and will make them readily available and understandable.

The information made available may include:

- The name or title and contact information of the Privacy Officer who is accountable for compliance with HeroWork Canada’s policies and procedures, and to whom complaints or inquiries can be forwarded to;
- Purposes for collection;
- A general description of the types of personal information held by HeroWork Canada;
- A copy of any document that explains HeroWork Canada’s policies, procedures, standards or codes;
- A general description of the types of personal information shared with third parties and who those parties are; and
- Risks of harm and other consequences related to collection, uses, disclosure and storage of personal information by HeroWork Canada.

9. Individual Access

Upon request, an individual shall be informed of the existence, use and disclosure of their personal information and be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Individuals have the right to access and review their own personal information. An individual may also provide written permission to HeroWork Canada to allow another individual to review his/her personal information, but only for that individual.

To access personal information, a written request must be sent to HeroWork Canada's Privacy Officer. A response will be provided within a reasonable length of time, but no longer than one month from the date the request was received.

For HeroWork Canada to provide an account of the existence, use and disclosure of personal information, the requesting individual will be asked to provide proof of identity and may be asked to provide additional information to aid in the search. The additional information provided will only be used for this purpose.

Upon request, HeroWork Canada, will provide specific information about third parties to whom personal information has been disclosed unless prevented from doing so by the terms of any applicable confidentiality or non-disclosure agreements.

The requested information will be made available in an understandable format. For example, where HeroWork Canada uses abbreviations or codes to record information, an explanation of those codes will be provided.

While our responses are typically provided at no cost to the individual, depending on the nature and amount of information involved, we reserve the right to charge a reasonable fee to recover the information requested by you. This fee will be estimated and provided for approval by the interested party before any work is undertaken. We will require a payment from you prior to recovering the information you have requested.

When an individual successfully demonstrates the inaccuracy or incompleteness of personal information in the control or custody of HeroWork Canada, will amend the information as required. Where appropriate, the amended information will be transmitted to third parties having access to the information in question.

10. Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual(s) accountable for the organization's compliance.

The name of HeroWork Canada's Privacy Officer will be known to staff and made available to the public on the website and other related documents.

HeroWork Canada will maintain procedures to receive and respond to complaints and inquiries about its policies and practices relating to the handling of personal information. The complaint procedures will be easily accessible and user-friendly.

Individuals who make inquiries or lodge complaints will be given information by HeroWork Canada of the existence of relevant complaint procedures.

If a complaint is found to be justified, HeroWork Canada will take appropriate measures including revision of the personal information, and if necessary, amendment of HeroWork Canada's policies and practices.

How to Contact the Privacy Officer

Harm, complaints, or access requests should be addressed to:

Privacy Officer
HeroWork Canada
Unit 209 – 3375 Whittier Avenue
Victoria, BC V8Z 3R2
privacy.officer@herowork.com

If a complainant is dissatisfied with the response from HeroWork Canada's Privacy Officer, within 30 days of receiving the response he/she may ask for a review or make a complaint in writing to the Office of the Information & Privacy Commissioner for British Columbia.

Office of the Information & Privacy Commissioner for British Columbia
PO Box 9038 Stn Prov Govt
Victoria, BC V8W 9A4