

<b>Section:</b> GOVERNANCE PROCESSES	<b>Policy Number:</b> G 7.10
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	<b>Date Approved:</b> January 2026
<b>Policy Attachment(s):</b>	<b>Date Reviewed:</b> January 2026

Birchway Niagara is committed to protecting the privacy of the information of its employees, clients, and other stakeholders. 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 individuals and organizations choose to share with us. During the course of our client service and associated operational activities, we frequently gather and use 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. Our privacy practices are designed to achieve this.

#### DEFINITION:

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 or beliefs, as well as facts about, or related to, the individual. Exceptions: business contact information and certain publicly available information, such as names, addresses, email addresses and telephone numbers as published in public directories, are not considered personal information. Where an individual uses their home contact information as business contact information as well, we consider that the contact information provided is business contact information.

#### PRACTICES:

Personal information gathered by our organization is kept confidential. Our personnel 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. Safeguards are in place to 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 ensure the integrity of this information is maintained and to prevent its being lost or destroyed.

We collect, use and disclose personal information only for purposes that a reasonable person would consider appropriate in light of the circumstances, i.e. Birchway Holiday Mailing List. We routinely offer individuals we deal with the opportunity to opt not to have their information shared for purposes beyond those for which it was explicitly collected, and we adhere to the Donor Bill of Rights <https://afpglobal.org/donor-bill-rights>

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***Website and Electronic Commerce***

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. Our software is routinely updated to maximize the protection of such information.

***Updating Of Private Policy***

We regularly review our privacy practices for our various activities and update our policy. Please visit our website regularly for the latest information on our current practices.

***Contact Information***

Questions, concerns or complaints relating to Birchway Niagara's privacy policy on the treatment of personal information should be e-mailed to [info@birchway.ca](mailto:info@birchway.ca)