

FOCUS ON THE FAMILY (CANADA) ASSOCIATION PRIVACY CODE

OUR COMMITMENT

In this Privacy Code, "we", "us", "our", "ours" and Focus on the Family Canada means Focus on the Family (Canada) Association, and "you" means (and "your" refers to) anyone who provides personal information to us.

We have adopted this Focus on the Family (Canada) Association Privacy Code (this "Privacy Code") to explain how we will meet our responsibilities with respect to the information you provide to us. This Privacy Code applies to both individuals and organizations, from whom we collect personal information.

The principles that form the basis of this Privacy Code are interrelated and Focus on the Family Canada adheres to all of the principles as a whole. Each principle should be read in conjunction with the accompanying commentary. As permitted by the *Personal Information Protection and Electronic Documents Act* ("PIPEDA"), the commentary in this Privacy Code has been drafted to reflect privacy issues specific to Focus on the Family Canada.

Focus on the Family Canada will continue to review this Privacy Code to make sure that it remains current with exceptions, changing technologies, industry standards and applicable laws.

Scope and Application

This Privacy Code applies to personal information, in any form, collected, used or disclosed by Focus on the Family Canada in the course of commercial activities. It will not typically apply to information directly regarding Focus on the Family Canada's corporate clients. However, such information may be protected by other Focus on the Family Canada policies and through contractual arrangements.

This Privacy Code does not impose any limits on the collection, use or disclosure of the following information by Focus on the Family Canada:

- information about an individual that is publicly available and is specified by regulation pursuant to PIPEDA;
- non-personally identifiable information; and
- the name, title, business address or telephone number of an employee of an organization, where collection, use or disclosure of such information is solely for the purpose of communicating with the person about his or her employment, business or profession.

The application of this Privacy Code is subject to the requirements and provisions of PIPEDA, and any other applicable legislation or regulation. If you reside in British Columbia, Alberta or Québec, then the substantially similar provincial privacy law of your province will apply to our handling of your personal information, rather than PIPEDA. In that case, reference in this Privacy Code to PIPEDA shall be deemed to include your province's substantially similar privacy law.

Any personal information which we collect via our websites is subject to the Focus on the Family Canada [Website Privacy Policy](#). This Privacy Code does not apply to employee and volunteer personal information. That information is covered by the Focus on the Family Canada Privacy Policy for Employees and Volunteers.

Definitions

collection: The act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

consent: Voluntary agreement for the collection, use and disclosure of personal information for defined purposes. The form of consent we seek may vary, depending upon the circumstances and the type of personal information. In determining the form of consent, we take into account the sensitivity of the personal information and your reasonable expectations. Consent may be provided directly by you, or by your authorized representative, in accordance with applicable law.

disclosure: Making personal information available to a third party.

employee: An employee of, or an independent contractor to, Focus on the Family Canada. The inclusion of independent contractors within the definition of "employee" is for convenience of reference only, and should in no manner imply that such independent contractors are our employees within the meaning of employment legislation or are in an employee-employer relationship with us.

personal information: Information about an identifiable individual, but does not include information that is used for the purpose of communicating or facilitating communication with an individual in relation to their employment, business or profession, such as the individual's name, position name or title, work address, work telephone number, work fax number or work electronic address.

third party: An individual or organization outside of Focus on the Family Canada.

use: The treatment, handling, and management of personal information by and within Focus on the Family Canada or by a third party with the knowledge and approval of Focus on the Family Canada.

we: Means (and "us", "our", and "ours" refer to) Focus on the Family Canada.

you: Means (and "your" refers to) the user of our services and products, and your successors, heirs, administrators, executors and assigns (as the case may be).

Principle 1 - Accountability

Focus on the Family Canada is responsible for personal information under its control and shall designate one or more persons who are accountable for Focus on the Family Canada's compliance with the following principles.

Focus on the Family Canada is responsible for all personal information under its control and has designated the Focus on the Family Canada Privacy Officer to oversee privacy compliance. Other individuals within Focus on the Family Canada may be delegated to act on behalf of the

Focus on the Family Canada Privacy Officer or to take responsibility for the day to day management of personal information. Focus on the Family Canada trains and communicates with employees about Focus on the Family Canada's privacy practices, including this Privacy Code. Our Board of Directors maintains ultimately accountability for, and oversight of, our privacy practices.

As appropriate, Focus on the Family Canada implements privacy policies and procedures to properly enforce this Privacy Code and Focus on the Family Canada uses contractual or other means to provide a comparable level of privacy protection while personal information is being processed or used by a third party.

Principle 2 - Identifying Purposes for Collection of Personal Information

Focus on the Family Canada shall identify the purposes for which personal information is collected at or before the time the information is collected.

Focus on the Family Canada collects personal information from individuals for the following purposes:

- to provide you with information, products, or services that you request from us, including resource materials and other related materials that are available through our websites, such as prayer requests and to connect you with counselling services that you have requested;
- to provide you with notices about your subscriptions, including expiration and renewal notices;
- to contact you about special events, promotions and fundraising and other similar matters which are directly or indirectly beneficial to us, including to provide information about how donated funds are used and to thank and publicly recognize our donors and other stakeholders;
- to carry out our obligations and enforce our rights arising from any contracts with you, including for billing and collection or to comply with legal or regulatory requirements, such as reporting charitable donations to the Canada Revenue Agency;
- to notify you about changes to any products or services we offer or provide;
- to improve our products or services, marketing, or customer relationships and experiences;
- to allow you to participate in interactive features, social media, or similar programs, including, without limitation, to request prayers or counselling;
- to measure or understand the effectiveness of the advertising we serve to you and others, and to deliver relevant advertising to you;
- to authenticate your identity, such as when you sign into your account;
- in any other way we may describe when you provide the information; and

- for any other purpose with your consent, or as required or permitted by law.

Further reference to “**identified purposes**” mean the purposes identified in this Principle.

Focus on the Family Canada specifies the identified purposes to individuals, orally, electronically or in writing, at or before the time personal information is collected. Persons collecting personal information may explain the identified purposes or refer individuals to a designated person within Focus on the Family Canada who can explain these identified purposes.

Focus on the Family Canada's internet servers may passively and automatically collect certain information about website visitors' traffic patterns, which may be linked to their Internet Protocol (IP) addresses (which are unique internet “addresses” assigned to all internet users by their internet service providers). Server logs may record statistical information, such as visitors' IP addresses, type of operating systems, time and duration of visit, pages requested, and identify categories of visitors by items such as domains and browser types. These statistics are generally collected and used on an aggregate basis.

The Focus on the Family Canada website may use “cookies”. Cookies are small text files offered to your computer by servers in order to keep track of your browser as you navigate a website. Cookies may be stored on your hard drive, or in temporary (cache) memory, in which case they are deleted when you shut down your browser or turn off your computer. We may use cookies to record session information, such as your browsing habits and past activity, to enable us to provide you with improved services such as customized webpage content. You can disable cookies using your internet browser's settings. Please consult your browser's help function for information on how to disable cookies.

For more information about how we collect and use personal information from our websites, please see the Focus on the Family Canada [Website Privacy Policy](#).

Principle 3 - Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of an individual are required for the collection, use, or disclosure of personal information, except where inappropriate. In certain circumstances personal information can be collected, used or disclosed without the knowledge and consent of the individual.

We generally collect, use, retain and disclose your personal information only with your knowledge and consent. We may depart from this general consent principle only in accordance with the limited exceptions set forth in applicable laws, including where we:

- reasonably expect that obtaining consent would compromise an investigation or proceeding;
- act in the case of an emergency that threatens a person's life, health or personal security;
- collect or pay a debt;
- obtain legal advice; and

- need to deal with an anticipated breach of law.

Your consent may be express or implied and may be given through an authorized representative such as a lawyer or agent you have authorized to provide consent on your behalf. If you are under the legal age, your consent may be obtained from a parent or guardian. When you provide personal information to us about a third party, you represent to us (and acknowledge that we are relying on same) that you have obtained that third party's consent to our collection, use and disclosure of their personal information in accordance with this Privacy Code.

Express consent may be given orally, in writing or electronically. For example, oral consent could be given over the telephone when information is being collected; electronically when submitting an agreement, application or other information; or in writing when signing an agreement or application. Consent may be implied by us if the purpose for the collection of the information would be reasonably obvious to you and is given voluntarily by you for that purpose. Consent may also be implied where we notify you that we intend to collect, use or disclose information and you do not decline our intended action within a reasonable period of time. The manner in which we obtain consent for the collection of personal information will vary with the sensitivity of the information being collected.

In obtaining your consent, whether express or implied, we will explain the purposes for which we will manage your personal information. We will not depart from these original and stated purposes unless you provide further consent or unless otherwise required or permitted by law.

You may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. You may contact us for more information regarding the implications of withdrawing consent.

Principle 4 - Limiting Collection of Personal Information

Focus on the Family Canada shall limit the collection of personal information to that which is necessary for the purposes identified by Focus on the Family Canada. Focus on the Family Canada shall collect personal information by fair and lawful means.

Focus on the Family Canada will only collect personal information that is necessary for the purposes identified in this Privacy Code.

Principle 5 - Limiting Use, Disclosure, and Retention of Personal Information

Focus on the Family Canada shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Focus on the Family Canada shall retain personal information only as long as necessary for the fulfillment of those purposes.

Focus on the Family Canada will not disclose personal information for purposes other than those purposes for which it was collected, except with the consent of the individual or as required or permitted by law. Focus on the Family Canada may disclose an individual's personal information:

- when we have your consent, whether express or implied;

- to your authorized representatives;
- to third party agents or suppliers engaged by Focus on the Family Canada to perform functions on our behalf;
- if and when Focus on the Family Canada is involved in a corporate reorganization or Focus on the Family Canada sells or leases all or part of its business;
- to meet legal and regulatory requirements; and
- where required or permitted by law.

In such circumstances, Focus on the Family Canada will not disclose more information than is required for the purpose for which the information is being disclosed. Focus on the Family Canada will also, whenever it is reasonable and practicable to do so, enter privacy agreements with third parties with whom Focus on the Family Canada shares personal information.

We and Focus on the Family (United States) may transfer personal information between each other, according to our policies, procedures and practices, except where prohibited by law. Focus on the Family (United States) will only use or disclose your personal information for the purposes which are set out in this Privacy Code or as necessary to carry out duties on our behalf.

Focus on the Family Canada will retain personal information for a period of time only as long as it remains necessary or relevant for the identified purposes or as required or permitted by law. Depending on the circumstances, where personal information has been used to make a decision about an individual, Focus on the Family Canada shall retain, for a period of time that is reasonably sufficient to allow for access by the individual, either the actual information or the rationale for making such decision.

Only our employees who require access for legitimate reasons or whose duties reasonably so require, are granted access to personal information.

Focus on the Family Canada maintains reasonable controls, schedules and practices for personal information management retention and destruction. Personal information that is no longer necessary or relevant for the identified purposes or is required by law to be retained is destroyed, erased or made anonymous, as appropriate in the circumstances.

Principle 6 - Accuracy of Personal Information

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

Focus on the Family Canada makes reasonable efforts to ensure that personal information it collects, uses or discloses is as accurate, complete and up-to-date as necessary for the purposes for which it is to be used. If an individual finds any errors in Focus on the Family Canada's personal information holdings, Focus on the Family Canada should be informed and will make the appropriate corrections. Focus on the Family Canada will convey these corrections to any third party that Focus on the Family Canada may have misinformed. For

personal information that remains in dispute, Focus on the Family Canada will make note in its records of an individual's opinion as to accuracy of the relevant personal information.

Principle 7 - Security Safeguards

Focus on the Family Canada shall protect personal information by security safeguards appropriate to the sensitivity of the information.

Focus on the Family Canada protects personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, through appropriate security measures, regardless of the format in which it is held. Focus on the Family Canada protects personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the personal information and the purposes for which it is to be used.

All of Focus on the Family Canada's employees with access to personal information are required to respect the confidentiality of that personal information.

We may engage service providers to assist us with fulfilling the purposes for which personal information has been collected, used and disclosed, and, in some instances, these service providers may be located outside Canada. We only select service providers that protect personal information in a manner that is comparable to the protection we provide under our own privacy policies. However, personal information may be subject to, and accessed under, the laws of the countries in which our service providers operate. If you have any questions about our transfer of personal information to our service providers outside Canada, or if you would like to learn more about our privacy policies in that regard, please contact the Focus on the Family Canada Privacy Officer at the contact information provided below.

Principle 8 - Openness Concerning Policies and Procedures

Focus on the Family Canada shall make readily available to individuals specific information about its policies and procedures relating to the management of personal information.

Individuals should forward questions or concerns regarding Focus on the Family Canada's policies and procedures relating to the management of personal information to the Focus on the Family Canada Privacy Officer.

Focus on the Family Canada is open about the policies, procedures and practices it uses to protect your personal information. Information about these policies, procedures and practices will be made available to you either electronically or in writing. To ensure the integrity of our security procedures and business methods, we may refuse to publically disclose certain information.

We will make the following information available:

- the name, title and address of the person accountable for the policies, procedures and practices and to whom complaints or inquiries can be provided;
- a description of the type of personal information held by us, including a general account of its use;

- a copy of any brochures or other information that explain the policies, procedures and practices; and
- an explanation of what personal information is made available to related organizations.

Principle 9 – Access to Personal Information

Upon request, Focus on the Family Canada shall inform an individual of the existence, use, and disclosure of his or her personal information and shall give the individual access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

An individual may access any personal information that Focus on the Family Canada has concerning them by sending a written request to the Focus on the Family Canada Privacy Officer. Focus on the Family Canada may advise an individual in advance if there is a minimal charge to conduct a search of our records and will respond within 30 days, or advise that the request for access is subject to an extension as authorized by PIPEDA.

In order to protect the privacy of individuals, individuals may be required to provide sufficient identification in order to permit Focus on the Family Canada to account for the existence, use and disclosure of certain personal information and to authorize access to such information. Any such information will only be used for this purpose.

Focus on the Family Canada may not be able to provide personal information to an individual if doing so would violate the privacy of a third party or if certain personal information is subject to legal privilege, contains information proprietary to Focus on the Family Canada or a third party, is too costly to retrieve, or cannot be disclosed for other legal reasons. If Focus on the Family Canada is unable to provide access to all or part of an individual's personal information, we will explain our reasons for such a decision.

Where an individual has been provided with access to their personal information, they shall be able to challenge the accuracy and completeness of their personal information and have it amended as appropriate.

Personal information that is disclosed to third parties by us will be subject to the general laws applicable in the jurisdiction in which the third party conducts business. As a result, and in certain limited situations, we may not be legally permitted to account for certain collections, uses or disclosures of personal information. In most circumstances, however, we shall provide an account of the collection, use and disclosure of personal information and, where reasonably possible, we shall state the source of the personal information. In providing an account of disclosure, we shall provide a list of organizations to which we may have disclosed your personal information when it is not possible to provide an actual list.

Principle 10 - Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for Focus on the Family Canada's compliance with the Focus on the Family Canada Privacy Code.

All questions or concerns regarding Focus on the Family Canada's privacy practices should be directed to the Focus on the Family Canada Privacy Officer.

We will, on request, provide you with information regarding our complaint response procedure.

Focus on the Family Canada will investigate all complaints concerning compliance with this Privacy Code and if a complaint is found to be justified, Focus on the Family Canada shall take the appropriate measures to resolve the complaint including, if necessary, amending its privacy policies and procedures. Focus on the Family Canada shall inform an individual of the outcome of an investigation regarding his or her complaint.

Additional Information

For more information regarding this Privacy Code, please contact the Focus on the Family Canada Privacy Officer at:

Focus on the Family (Canada) Association
19946 - 80A Avenue
Langley, BC V2Y 0J8
Attention: The Privacy Officer
Email: privacyofficer@fotf.ca

and/or via our toll-free number:

1.800.661.9800

Please also visit the Office of the Privacy Commissioner of Canada's internet web site at <https://www.priv.gc.ca/en/>.

Last Revised: April 10, 2019