

Title of Policy:	Privacy Policy and Procedures
Policy Type:	Governance
Approval Date:	February 29, 2024
Approved by:	Nova Scotia Nature Trust Board of Directors
Next Review:	February 2027
Review History	Created December 17, 2009

1.0 POLICY

The Nova Scotia Nature Trust (the Nature Trust) recognizes the importance of privacy and sensitivity to personal information. The Nature Trust is committed to collecting, using, and disclosing personal information responsibly and only to the extent necessary for the services provided by the Nature Trust. To ensure transparency and accountability, the Nature Trust has developed procedures in accordance with the ten principles of the Canadian Standards Association Model Code for the Protection of Personal Information. In this respect, the Nature Trust will only collect personally identifiable information (PII) when it is voluntarily provided, such as in association with a mailing list, land acquisition, through a donation to the Nature Trust, or for Board Members, Staff, and Volunteers. Furthermore, at no time will Nature Trust Board Members, Staff, and Volunteers ask for information that is not needed to fulfill a specific request or ask for information without a stated purpose.

All Board Members and Staff will be provided with a copy of this Privacy Policy and Procedures as part of the onboarding process and will attest to reading and understanding the Policy and agreeing to abide by it (see form attached). All Volunteers will be provided online access to the Policy and will sign a statement agreeing to protect privacy and confidentiality.

2.0 DEFINITIONS

“Personal information” is any information which can be used to identify, distinguish, or contact a specific member, donor, staff, or other contact from the Nature Trust’s records, but does NOT include the name, title, or business address or telephone number of an employee of an organization.

“Board Members, Staff and Volunteers” includes all full time, part time, and contracted employees of the Nature Trust, Board of Directors, and all volunteers.

3.0 POLICY APPLICATION

This Policy and Procedures applies to all Board Members, Staff and Volunteers.

Privacy Procedures

1.0 PROCEDURES REGARDING THE COLLECTION OF PERSONAL INFORMATION

- The Nature Trust will only collect personal information (other than for Board Members, Staff and Volunteers) when it is voluntarily provided, such as in association with a mailing list, land acquisition, or through a donation to the Nature Trust.
- The organization collects, uses, and discloses Staff personal information to administer the employer-employee relationship. This includes hiring, administering payroll and benefits programs, employment contracts, and providing references for former employees.
- The organization collects, uses, and discloses Board and Volunteer personal information to administer volunteer engagement, management, support, and reporting.
- Personal information provided to Staff, Board and Volunteers will be used for the sole purpose for which it is given and only the minimum amount of information required in meeting any involvement with the Nature Trust will be collected.
- At no time will Nature Trust Board, Staff or Volunteers ask for information that is not needed to fulfill a specific request or ask for information without a stated purpose.
- Personal information may be used for internal risk management purposes.

1.1 Permitted Uses for Personal information collected by Nature Trust Staff, Board and Volunteers

- The Nature Trust may use personal information for one or more of the following purposes:
 - Processing a membership or donation to the Nature Trust including the issuing of receipts.
 - Contacting people to renew membership, support an appeal of the Nature Trust, or to get involved in a local event or program or other volunteer activities.
 - Providing people with information updates about the Nature Trust's activities via mail or email.
 - Contacting supporters for feedback as well as for surveying requests in connection with the services and programs offered by the Nature Trust.
 - Publishing names of supporters in the Nature Trust's publications (unless a request is made by the supporter not to do so).
 - Sharing news of the Nature Trust's programs and campaigns with the media, including donor or member support (unless a request is made by the supporter not to do so).
 - Managing the employment relationship with Staff.
 - Managing the volunteer relationship with Board members and Volunteers.

2.0 PROCEDURES REGARDING THE PROTECTION OF PERSONAL INFORMATION

- The Nature Trust adheres to the ten principles for the protection of personal information found within the Personal Information Protection and Electronic Documents Act ("PIPEDA") and the Model Code for the Protection of Personal Information created and approved by the Canadian Standards Association ("CSA Code").

2.1 Accountability

- The Nature Trust will be responsible for all personal information under its control.

- The Nature Trust will have a designated individual (“Privacy Officer”) who is responsible for the day-to-day care and control of personal information.
- The Nature Trust will provide a ‘privacy statement’ on their website informing visitors how their private information will be collected, used, and stored.
- The Nature Trust will develop procedures to protect personal information including, but not limited to (see section 2.7):
 - Receipt of and response to complaints and inquiries.
 - Staff training to enforce the Nature Trust’s policy and practices with respect to personal information.
 - Developing and distributing information to Nature Trust Staff, Board and Volunteers and to the public outlining the Nature Trust’s procedures with respect to personal information.

2.2 Identifying Purposes

- The Nature Trust will use all reasonable efforts to provide information to people on how any personal information provided will be used by the Nature Trust and for what purposes.

2.3 Consent

- The Nature Trust will obtain explicit consent for all stated purposes when personal information is provided to the Nature Trust.
 - Individual consent for the use and collection of personal information will be explicitly sought during any communication with Nature Trust supporters, whether verbal or written, which involves the collection of personal information.
 - Supporters are entitled to withdraw consent for the retention and use of personal information at any time through contacting the Nature Trust’s Privacy Officer to discuss all options in this regard.
 - Consent from Staff, Board and Volunteers for use of their personal information is deemed to be implied but only to the extent necessary to administer the employment and managing relationships, volunteer engagement, as well as provide information and updates.
- The Nature Trust may periodically request written confirmation from supporters to ensure that the personal information collected and maintained by the Nature Trust is up-to-date and accurate and to establish continuing consent to the use or retention of any personal information.
- The Nature Trust will only disclose personal information without notice if required to do so by law.

2.4 Limiting Collection

- The Nature Trust will restrict the collection of personal information only to that information that is necessary for the permitted uses as noted above.

2.5 Limiting Use, Disclosure and Retention of Personal Information

- The Nature Trust will not sell, trade, lease, or barter any of the personal information collected.
- The Nature Trust will not provide any personal information to any third-party individuals or companies without their consent, unless required by law to do so.
- The Nature Trust will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the member or as required by law.
- The Nature Trust will retain personal information only for as long as it is needed and only for the fulfillment of the disclosed purposes under which it was originally collected.
- The Nature Trust may use internal records for cross-departmental purposes when in keeping with the spirit in which private information was shared (such as sending our newsletter to volunteers or sharing volunteer opportunities with event participants).

2.6 Accuracy of Personal Information

- The Nature Trust will maintain accurate, complete, and up-to-date personal information and may contact supporters to update personal information for the permitted purposes as noted above.
- Individuals may check and correct personal information by contacting the Nature Trust's Privacy Officer in a manner as set out in Section 3.0 below.

2.7 Safeguards for Personal Information

- The Nature Trust will develop and implement security mechanisms appropriate to the sensitivity and confidentiality of personal information being retained, including but not limited to:
 - Physical security measures, such as locked cabinet storage, shredding hard copy documents and restricted access to areas where personal information is stored.
 - Internal employee and volunteer security measures, including restricted computer access, staff, and volunteer confidentiality agreements; security training and best practices.
 - Technological measures including the use of complex passwords, device screen time out parameters, IT managed services, virus protection and firewalls where personal information is stored electronically.
- The Nature Trust will enter into confidentiality agreements with any third parties who may come into contact with personal information requiring third party protection of personal information.
- In entering into these confidentiality agreements, the Nature Trust will not transfer any interest in personal information but simply require that personal information delivered to third parties is maintained at a level of security equal to that provided by the Nature Trust under its *Privacy Policy*.

2.8 Openness

- The Nature Trust will make available all information about the policies and practices relating to the management of personal information to supporters who contact the Nature Trust's Privacy Officer in writing or by email to the address set out in Section 3.0.

- Should the Nature Trust be unable to provide an individual with access to all the personal information held, the reasons for the denial of such access will be provided.

2.9 Individual Access to Personal Information

- Individuals may request access to personal information held by the Nature Trust at any time.
- The Nature Trust reserves the right to confirm the identity of the person seeking access to personal information before complying with any access requests.
- Requests to access any personal information will be directed to the Nature Trust's Privacy Officer at the address set out in Section 3.0.

2.10 Challenges to Policy Compliance

- The Nature Trust's Privacy Officer will receive and respond to all information requests regarding the Nature Trust's Privacy Policy or about personal information under the Nature Trust's care and control within a timely manner.
- The Nature Trust's Privacy Officer shall respond to any challenge concerning compliance with the Privacy Policy within a timely manner.

3.0 PRIVACY OFFICER CONTACT INFORMATION

- The Nature Trust will appoint a Nature Trust Staff member as a Privacy Officer who is responsible for the day-to-day care and control of personal information, in compliance with the terms of this Privacy Policy.
- The Nature Trust's Privacy Officer may be contacted in writing or by email at the address listed below:

Nova Scotia Nature Trust
Privacy Officer
81 Prince Albert Road
Dartmouth, NS B2Y1M1
nature@nsnt.ca

4.0 PROCEDURES REGARDING SECURITY AND THE INTERNET

- The Nature Trust will take all reasonable measures to keep personal information secure however, any personal information transmitted over the Internet (e.g. through a website or via email) may not be secure unless explicitly stated as being secure.
- The Nature Trust will not accept any liability for loss, misuse, or alteration of personal information submitted via the Internet.

Nova Scotia Nature Trust

**CONFIDENTIALITY AGREEMENT AND PRIVACY POLICY AND PROCEDURES ACKNOWLEDGEMENT FORM
(for Staff and Board Members)**

I have read and understand the Nature Trust’s Privacy Policy and Procedures and agree to abide by them.

I acknowledge and accept that it is a condition of employment/volunteering with the Nova Scotia Nature Trust (the Nature Trust) that during and after my employment/volunteer role with the Nature Trust, I will not disclose to anyone any information of a confidential nature arising from operation of the business, including but not limited to, customer and supplier lists, contracts and agreements, email and other forms of internal and external communications directly or indirectly related to the Nature Trust, (whether or not protected by solicitor-client or other legal privilege), research and development, production operations and facilities, and planning activities of the company, unless such disclosure is expressly authorized by the Nature Trust or required by law.

I further acknowledge and agree that any email and other correspondence, reports, books, customer and supplier lists, employee information, price lists quotes, estimates, formulae, designs, prints, computerized programs and data, and any other material directly or indirectly related to the Nature Trust, activities are and shall be treated by me as the sole property of the Nature Trust, and are to be maintained as confidential both during and after my employment with the Nature Trust.

I hereby certify that the information set forth above is true and complete to the best of my knowledge.

Name: _____

Position/Role with the Nature Trust: _____

Signature: _____ Date: _____

Note: *This acknowledgement may be modified and combined with other policy acknowledgements in an employment contract, board agreement or other similar document.*

**CONFIDENTIALITY AGREEMENT
(for non-board volunteers)**

I acknowledge and accept that it is a condition of volunteering with the Nova Scotia Nature Trust (Nature Trust) that during and after my volunteer role with the Nature Trust, I will not disclose to anyone any information of a confidential nature arising from operation of the business, including but not limited to, customer and supplier lists, contracts and agreements, email and other forms of internal and external communications directly or indirectly related to the Nature Trust, (whether or not protected by solicitor-client or other legal privilege), research and development, production operations and facilities, and planning activities of the company, unless such disclosure is expressly authorized by the Nature Trust or required by law.

I further acknowledge and agree that any email and other correspondence, reports, books, customer and supplier lists, employee information, price lists quotes, estimates, formulae, designs, prints, computerized programs and data, and any other material directly or indirectly related to the Nature Trust, activities are and shall be treated by me as the sole property of the Nature Trust, and are to be maintained as confidential both during and after my volunteer role with the Nature Trust.

I hereby certify that the information set forth above is true and complete to the best of my knowledge.

Name: _____

Position/Role with the Nature Trust: _____

Signature: _____ Date: _____

Note: *This acknowledgement may be modified and combined with other policy acknowledgements in a volunteer agreement or other similar document.*