POLICY 06

Privacy, Data Protection and Cybersecurity

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Purpose and scope

This policy covers applicant, participant, donor, volunteer and partner information collected through forms, email, websites, learning tools and other services.

Collection, use and choices

State what information is collected, why it is needed, who receives it, where it is processed, how long it is retained and how people can ask for access or correction. Collect only what the activity requires. Collect sensitive information only when necessary and lawful.

Use meaningful consent where applicable. Keep optional media, testimonial, promotional and group-chat choices separate from admission. Review applicable privacy laws for each activity, including PIPEDA where information is handled in the course of commercial activity.

Access, suppliers and retention

Use individual accounts, multifactor authentication for administrators, minimum necessary permissions, controlled exports and secure sharing. Revoke access promptly when a role ends. Assess supplier privacy terms, cross-border processing and agreements before adoption.

Set retention by record category. Log suspected breaches promptly, contain exposure, assess whether notice or reporting is legally required, and record decisions and corrective action.

AI processing

Review approved purpose, hosting, retention, training use, subprocessors and deletion before allowing participant data in an AI system. Keep confidential material out of unapproved tools and document access revocation and incident handling.

Records and review

The responsible lead keeps the records needed to demonstrate implementation, including relevant approvals, training, checks, incidents and corrective actions. Review this policy at least annually and after a material incident, change in law or funding, or significant program expansion. Refer material changes to the authority designated by Potter's House.

Standards for AI-assisted work

Use approved tools for a defined learning or operational purpose. A person reviews AI-assisted work, checks substantive claims against reliable sources and decides what to use. Protect private information, disclose material AI use and provide an accessible alternative where needed. Record the purpose, tool and permissions, privacy checks, verification, incidents and follow-up.

Official references

Office of the Privacy Commissioner of Canada - PIPEDA and non-profits