



Subject: *Communications*
Applies to: *Employees, Members, Public*

Approved by NTNBoard on: 2020-01-25
No: #1

Privacy Policy

1. PURPOSE

Nature Trust of New Brunswick (Nature Trust) is committed to protecting the privacy of personal information of its employees, volunteers, members, customers, donors, and other stakeholders. We value the trust of those we deal with, and of the public, and recognize that maintaining this trust requires transparency and accountability in how we treat the information that is shared with us.

Nature Trust frequently gathers and uses personal information throughout our various projects and initiatives. Personal information will be carefully protected and any use of, or other dealing with, this information is subject to consent.

2. SCOPE

2.1 This policy applies to employees, board members, and volunteers, and web and social media users.

2.2 This policy describes the organization's objectives and policies regarding the protection of personal information to ensure transparency and accountability.

2.3 Major restrictions/conditions

- Information in the public domain is not subject to privacy legislation and as such is not included in this policy. See DEFINITIONS section for more information.
- Customers and clients that use their home contact information as business contact information will be considered as business contact information not personal information and is therefore not subject to protection as personal information.
- All donor and volunteer information are considered personal information, and the Nature Trust does not disclose information about donors or volunteers without consent.

3. REFERENCES

- Nature Trust's Code of Conduct Policy
 - Nature Trust's Conflict of Interest Procedure and Standard
- Nature Trust's Website Content Policy
- [Right to Information and Protection of Privacy Act, New Brunswick](#)
- [Privacy Commissioner of Canada website](#)

- Personal Information Protection and Electronic Documents Act (PIPEDA), Canada
- Canada AdChoices Program

4. CONTACT

If you have any concerns about any information outlined in this policy, please contact our Chief Executive Officer at naturetrust@ntnb.org.

5. DEFINITIONS

Term: Personal Information

Definition: Personal information is any recorded 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.

Term: Public Domain Information

Definition: Business contact information, and certain publicly available information, such as names, addresses and telephone numbers as published in telephone directories are considered public information and therefore not subject to the same laws as personal information.

Term: Personally Identifiable Information (PII)

Definition: It is any data that could potentially identify a specific individual. Any information that can be used to distinguish one person from another and can be used for de-anonymizing anonymous data can be considered PII.

Term: Cookies

Definition: A cookie is a small data file of information offered to a user's computer by web servers to recognize the user and keep track of their preferences as they navigate the website. A pixel tags are small blocks of code on a webpage that allow websites to do things like read and place cookies.

6. RESPONSIBILITIES

Role	Responsibility
Chief Executive Officer (CEO)	They are responsible for: <ul style="list-style-type: none">• Ensuring the professional conduct of employees regarding personal information• Keeping up to date on personal information policy or legislation updates and changes
Communications and	They are responsible for:

**Engagement
Manager**

- Maintaining and updating the website and Social Media (SM) accounts.
- Ensuring website data/analytic tracking, such as cookies, and other privacy policies on the website are up to date and legally sound.

All Staff

They are responsible for:

- Ensuring that private information is protected and remains confidential
- Using private information only for the reason(s) it was collected
- Following the federal and provincial acts and legislation requirements regarding personal information
- Understanding and practicing the Nature Trust's Code of Conduct policy and procedures

7. Consent

An individual's consent is required regarding the collection and proposed use of personal information when information is collected. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from an individual's action or inaction.

NOTE: An individual's consent must be given in writing or electronically before confidential information is released to outside parties.

7.1. Collection

In response to donating to the Nature Trust, inquiring about our programs, participating in our surveys, visiting our website, engaging with us on social media, or contacting our office, Nature Trust may have collected the following personal information from you:

- Your name
- Address
- Telephone number
- Email address and/or facsimile number
- Your date of birth (optional)
- Emergency Contact Name, Relationship, and phone number (in response to event sign ups)
- Credit card or banking information (only in response to donations)
- How did you hear about this event (in response to event sign ups)
- Nature Trust social media engagements (likes, comments, shares, retweets, other interactions).

7.2. Reason for Collection

Nature Trust collects personal information to maintain our relationship with our supporters and to keep them up to date with our ongoing initiatives and programs. Regarding donations, we collect information to process donations, and confirm identities and addresses to provide accurate donation receipts. Credit card or bank account information may be collected for the convenience of the monthly and annual giving programs.

Nature Trust keeps its supporters informed of activities and donor opportunities by mailing them occasional updates and appeals for support, including the *Refuge* and Annual Reports. Individuals who do not wish us to use or disclose personal information for purposes of providing information about the activities of the Nature Trust can email the contact listed above.

Subject to any legal or statutory requirements, we will abide by the individuals' preferences. If individuals have not notified us regarding their preferences, the personal information will be considered consented to our continued use, and disclosure and retention of your information for these purposes. Individuals may contact us to withdraw or change your consent at any time. We will

honour any request you may make to have access to or review your personal information that we have obtained as referred to above.

7.3. Limited Collection

The collection of personal information is limited to that which is relevant and necessary to our programs and fundraising efforts. Nature Trust will not make unwarranted or intrusive inquiries into a donor or prospect's gift history or personal life. Nature Trust attributes all data that it collects.

8. Website

8.1. Digital Markers: Cookies

Nature Trust's website uses cookies on the website to collect data regarding user experience, user geography, as well as other accurate site traffic data to help our website run effectively. By using the Nature Trust website, users agree to our use of cookies to provide a great experience.

NOTE: We do not combine information about you from these digital markers with other information that you provide to us.

Nature Trust uses digital markers for several purposes. Specifically, they are used the following ways:

- Tracking user visits to the Nature Trust website, including new and previous visitors, and website visits per week, month, year;
- To analyze how the services are being accessed and used, and to track performance of the services;
- Tracking preferences (such as device type, direction source, language, geographical location, browser type, operating system);
- Enabling web analytic tools (such as Google Analytics).

By using this information, Nature Trust learns how individuals interact with our website or promotional communications, how we can improve the design and content of our website or promotional communications, and how to improve user experience on our website or with our promotional communications. We may use digital markers to collect information that may be used in interest-based advertising (see section 9.3. for definition). In some cases, the use of digital markers is necessary for website functionality. For example, we may use digital markers to track your web browser so that we can properly process forms and other requests that require keeping track of you between web pages.

NOTE: The Nature Trust is not responsible for any digital markers being used by third-party social channels, such as Facebook or Instagram.

We share information collected through digital markers with other companies who assist us with website analytics and digital advertising. Website analytics involves the collection of data for the purposes of measuring and reporting on website traffic and visits.

Cookies are used anonymously and without storing Personally Identifiable Information (PII). Visitors that wish to opt-out of cookies should review the help documentation for their browser software to decline or selectively decline cookies. Note that declining cookies may adversely impact site performance.

8.2. Google Analytics

Nature Trust website uses Google Analytics to track performance. Google Analytics uses persistent cookies to track visitor sessions, visitors across multiple sessions, and referral sources to our sites. The Nature Trust also tracks the performance of promotional links to our site using Google Analytics. In compliance with the Google Analytics Terms of Service, at no time is personally identifiable information (PII) passed to Google Analytics. Note that Google Analytics stores its data within the United States of America and is subject to US laws. The Nature Trust uses this data to understand site performance to serve you better. Those wishing to opt out of Google Analytics data collection should use the Google Analytics Opt-out Browser Add-on.

8.3. Interest-based Advertising/Google Adwords

The Nature Trust collects information about website user visits to our website in order to provide the user with relevant advertising on other sites participating in the Google AdWords Network. Interest-based advertising is a type of ad customization that is based on predictions about user interests generated from their visits over time and across different websites. Nature Trust collect this information using digital tags that recognize the user when they visit our website. Users may opt-out by removing or blocking Cookies deposited in their browser by Google AdWords. Users may remove or block cookies by adjusting their browser settings to clear or block cookies. Users may also visit www.youradchoices.ca to opt-out of interest-based advertising. Please note that by doing so,

Individuals may still see advertising from the Nature Trust of New Brunswick on other websites. However, this advertising will not be based on information that we collected during your visit.

9. Limited 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.

10. Accuracy

Personal information shall be as complete, accurate, and up-to-date as possible. Donors are encouraged to review, correct and update personal information.

11. Security Safeguards

Personal information gathered by Nature Trust shall be kept in confidence. Nature Trust personnel shall be authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained.

Appropriate physical and electronic measures shall be used to ensure personal information is secure. Access to donor and volunteer records shall be limited to those who require such information to fulfil their job responsibilities. Special protection shall be given to all records pertaining to anonymous donors. The confidentiality of donor and volunteer records shall continue after the relationship with the individual has ended.

12. Confidentiality

Donors who request that their name and/or the amount of the gift not be publicly released shall remain anonymous.

13. Cyber Security

Cybersecurity is the process of protecting information by preventing, detecting and responding to cyber breaches. A cyber breach is the loss of, unauthorized access to or disclosure of personal information, through a cyber-attack or an operational failure. The Nature Trust takes steps to identify, assess, and mitigate risks associated with cybersecurity. We have implemented measures designed to secure personal data from accidental loss and from unauthorized access, use, alteration, and disclosure (such as identity and access management, password rotation, access control monitoring, and leading firewall technologies). Personal data provided to us in accordance with this policy will be encrypted in transit. If a cyber breach results in the release of Personally Identifiable

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Information, the Nature Trust will report to the Privacy Commissioner of Canada and notify the affected individuals.

14. Openness

Upon request, individuals shall be given access to the information in their donor record.

Information in this Policy was written in reference to the Nature Conservancy of Canada's Privacy Policy.