

OCIC PRIVACY POLICY

Approved by the Board of Directors July 2026

1.0 Statement of Philosophy and Purpose

The Ontario Council for International Cooperation (OCIC) is committed to upholding the privacy of private and identifiable information. While OCIC is not subject to the protection obligations outlined in the [Personal Information Protection and Electronic Documents Act \(PIPEDA\)](#), this policy is based upon PIPEDA's 10 Fair Information Principles and is intended to ensure the protection of personal information of our donors, prospective donors, members, partners, program participants, and all others who interact with us, in accordance with existing federal and provincial government privacy legislation including PIPEDA, and [Canada's Anti-Spam Legislation](#), and has established privacy practices for this purpose.

2.0 Definitions

Personal information as defined by PIPEDA includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form, such as: age, name, gender, marital status, education, address, telephone number, ID numbers, income, ethnic origin, blood type, opinions, evaluations, comments, social status, or disciplinary actions. It also includes employee files, credit records, loan records, medical records, the existence of a dispute between a consumer and a merchant, and intentions (for example, to acquire goods or services, or change jobs).

Provincial and federal law: Refers to the [Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. F.31](#) as administered by the Government of Ontario (where related to government, crown agencies and institutions collecting data) and the [Personal Information Protection and Electronic Documents Act, S.C. 2000, c. 5](#) as administered by the Federal Government (where related to all other activities of OCIC).

Database: Refers to the list of names, addresses, telephone numbers, and email addresses of members, partners and other individuals held by OCIC in the forms of, but not limited to, computer files, paper files, and files on hard-drives or cloud storage.

Express Consent: Means the individual signs any form containing personal information, authorizing OCIC to collect, use, and disclose the individual's personal information for the purposes set out in the application and/or forms.

Implied Consent: Means OCIC may assume that the individual consents to the information being used, retained and disclosed for the original purposes, unless notified by the individual.

Website **Cookies** are small text files placed on a person's device by websites to remember information about the person's visit, such as login credentials, shopping cart items, or site preferences. They enable a personalized, faster browsing experience by storing data, but can also track user behaviour for advertising purposes.

Ten Fair Information Principles: Refers to ten principles laid out in PIPEDA, which are intended to ensure the safety of individual personal information and include

1. Accountability
2. Identifying purpose
3. Consent
4. Limiting collection
5. Limiting use, disclosure and retention
6. Accuracy
7. Safeguards
8. Openness
9. Individual access
10. Challenging compliance

3.0 Application and Scope

The intent of this Policy is to disclose the privacy practices of OCIC including our website, ocic.on.ca, identify the roles and responsibilities of workplace parties to maintain confidentiality and protect the privacy of individuals whose personal information is collected and used by OCIC in the workplace, and to explain the process available to raise questions, concerns or complaints about the Council's handling of personal information policies and practices. This Policy applies to all OCIC staff, Board and volunteers, when they are interacting with, engaged by, or working with or for OCIC. Staff, Board and volunteers are expected to be aware of this Policy and to comply fully.

4.0 Review

As per OCIC's 5-year review policy, this Policy is to be reviewed and/or updated by the Governance Committee by 2031. Any changes must be approved by the OCIC Board of Directors.

5.0 Information Collection

OCIC collects data across various platforms, including: websites; social media sites such as, Facebook, Instagram, LinkedIn; digital advertising such as, Facebook ads, Google Adwords; communications and event platforms, such as, MailChimp, Eventbrite, Zoom, PayPal; and evaluation tools, such as Google Forms, JotForm, and Survey Monkey.

OCIC members that register on our website, individuals that sign-up to receive OCIC's eBulletin or other communications voluntarily, and individuals who register for our events or activities provide us with contact information (such as name and email address). Various optional demographic information such as age, gender, accessibility needs, dietary considerations, postal code, city, and province may be collected to help us better serve our constituents.

Individuals may visit the OCIC website without identifying themselves or providing any personal information about themselves. Contact information for our member organizations is published on the "Membership" section of our website and is accessible to the public. By joining as a member and

completing the OCIC membership form, including providing OCIC with contact information about member organizations, OCIC understands the members are giving consent to allow OCIC to publish the information about the organization, including contact information. Members may change the information that is published on the OCIC website at any time, by notifying OCIC via info@ocic.on.ca. Furthermore, by joining OCIC as a member, members are giving consent to allow OCIC to contact them regarding their membership.

Individuals may “opt out,” at any time by contacting info@ocic.on.ca if they do not wish to receive messages from OCIC or to request their data be removed from OCIC’s databases. Data will be stored as long as necessary, or until it is requested that it be removed.

Additionally, OCIC collects names, contact information, and in some cases, relevant financial information for the purpose of issuing payments, including honorariums, to contractors, guest speakers, facilitators, and program participants.

5.1 Information Provided Directly to OCIC

Information that is provided directly to OCIC by individuals, includes:

- Contact and identify information: name, email address, phone number, and mailing address
- Membership information: organization name, membership type, and membership renewal details
- Application information: name, email address, phone number, mailing address, work and volunteer history, education, names and contact information of references
- Account credentials: username and password for the member login portal
- Donation and payment information: payment card details processed through our secure payment provider (we do not store credit card numbers)
- Event registration details: dietary requirements, accessibility needs, and other preferences individuals share when registering for OCIC events
- Opportunities and event postings: information submitted when website users post a job, volunteer opportunity, or event on OCIC’s website
- Newsletter and mailing list subscriptions: name, email, and mailing list preferences
- Communications: emails, inquiries, or feedback individuals sent to OCIC

5.2 Information Collected Automatically

When visiting OCIC’s website (ocic.on.ca), we and our third-party service providers may automatically collect information, including:

- Log data: IP address (see Section 5.3 for more information), browser type and version, operating system, referring URL, pages visited, and time and date of the user’s visit
- Cookies and tracking technologies (see Section 5.4 for more information)
- Analytics data: information about how users navigate and interact with OCIC’s website, collected through tools such as Google Analytics

5.3 IP Addresses

OCIC uses website visitor IP addresses to help diagnose problems with our server, to administer our website, and for statistical metrics used to track website visitor traffic.

5.4 Cookies

Our website uses cookies to record session information and to track a user's path through our website. This enables OCIC to respond to problems with our site and to better understand usage for site improvement. Cookies inform OCIC of its website users and their website preferences, based on what those users have done and told us before. The "cookie" is placed in a user's computer and is read when the user returns to OCIC's website. Cookies let OCIC take website users to the information and features they're particularly interested in. They also let us track website users' usage of our website, so we know which parts of our site are the most popular.

OCIC uses the following types of cookies:

- Strictly necessary cookies: required for the website to function, including member login and session management
- Analytical/performance cookies: helps OCIC understand how visitors use our website (e.g. Google Analytics)
- Functionality cookies: allow OCIC's website to remember your preferences and settings

Website users can control, reject, or disable cookies through their browser settings by instructing their web browser accordingly. However, disabling certain cookies may affect the functionality of OCIC's website, including the ability to log into member accounts.

5.5 Social Media

Individuals who voluntarily submit or post any information, photographs or other content to any OCIC Facebook, Instagram, LinkedIn pages or other social networking pages/sites, should be aware that certain elements of their personal information will be automatically included in the posting, including their username and email address, and this information may be collected and used by others. OCIC has no control over and is not liable for the collection, use or disclosure of any posted user content by users of such social media networking pages. Any personal information posted, used or disclosed via such sites is not subject to this Policy.

5.6 Linking to Outside Websites

Links to third-party websites from the OCIC website are provided for the convenience of our users. OCIC's website may contain links to third-party websites, including our funders, partners, and social media platforms. OCIC has no control over, and therefore has no responsibility or liability for, the manner in which the organizations that operate such linked websites may collect, use, disclose or otherwise treat users' personal information. The inclusion of any link does not imply OCIC's endorsement of any other organization, its websites, or its products and/or services. An OCIC website user's use of any linked website is solely at their own risk.

6.0 Information Use and Sharing of Information

6.1 Information Use

OCIC uses individual personal information broadly to provide individuals with personalized service; to send relevant email alerts about upcoming events and activities; to answer individual requests; to process membership applications; to provide official documentation; for fundraising appeals, etc.

Specifically, OCIC uses personal information:

- To process and manage membership applications, renewals and member profiles
- To process donations
- To register participants for and administer OCIC programs
- To send out our e-Bulletin and opportunity updates (based on listserv subscriptions)
- To respond to inquiries and provide customer service support
- To post opportunities and events on behalf of members and other partners, as submitted through our website forms
- To operate, maintain, and improve our website and digital services
- To analyze website usage and understand how visitors engage with our content
- To comply with legal and regulatory obligations
- To fulfill any other purpose for which individuals provide personal information, or to which they consent

Additionally, OCIC may also use website user information to track visitors to our website. This lets OCIC see which of our pages and features are most popular so we can better serve our users' needs. Individuals may choose to opt out at any time, which will cease all communications from OCIC. We will not use an individual's personal information for purposes incompatible with those listed above without first obtaining consent from the individual.

6.2 Sharing Information

OCIC shares aggregated demographic information with our funders and partners, as part of our reporting requirements. This information is not linked to any personal information that can identify an individual person, unless consent from the individual has been acquired in advance (to attribute a specific story of impact or quote to an individual, for example). OCIC uses outside communication and payment platforms. These companies do not retain, share, store or use personally identifiable information for any secondary purposes beyond providing services for OCIC.

6.3 AI and Personal Information

OCIC staff, Board and volunteers are required to uphold privacy and protection of personal information, including by not sharing it with generative AI tools or any third-party service providers. OCIC will provide staff, Board and volunteers with information on acceptable and prohibited usage of generative AI tools based on organizational and third-party experience.

7.0 Access to and Correction of Personal Information

Individuals, including members and program participants, have the right to access and correct inaccuracies in the personal information OCIC has about them in our records. To do so, they should

contact OCIC. To protect individual privacy, OCIC will take reasonable steps to help verify the individual's identity before granting access or making corrections to personal information.

8.0 Privacy and Safeguards

OCIC will take all reasonable measures to protect personally identifiable information against loss or theft. Data will be stored in secured, encrypted databases and will be accessible only by select internal staff members, and as needed by interns, volunteers and other persons or organizations who act for, or on behalf of OCIC to perform services provided by OCIC. In turn, these employees, interns, volunteers and other persons or organizations who act for, or on behalf of OCIC to perform services provided by OCIC shall be made aware of the need to protect personally identifiable information.

OCIC does not sell, rent, trade or exchange personally identifiable information with any third parties outside the official operations of the organization. Exceptions would be made only to comply with the law or request by a law enforcement agency; we may release any and all collected information to the proper authorities if OCIC believes in good faith that such disclosure is necessary to protect the organization, protect an individual's or public safety, investigate fraud, or respond to a legal process.

OCIC may share individual personal information in the following limited circumstances:

8.1 Service Providers

OCIC engages trusted third-party service providers to perform functions on our behalf, including payment processing, email delivery, website hosting, and analytics. These providers are authorized to use individual personal information only as necessary to provide services to OCIC and are contractually required to protect individual personal information.

8.2 Partner Organizations

OCIC works in partnership with organizations such as the Inter-Council Network of Provincial and Regional Councils for International Cooperation (ICN), Cooperation Canada, and with Global Affairs Canada. OCIC may share aggregated or anonymized information with these partners for programming and/or reporting purposes. OCIC will not share individually identifiable personal information with partner organizations without individuals' consent.

8.3 Organizational Transactions

In the event of a merger, restructuring, or transfer of OCIC's operations, personal information may be transferred as part of that transaction, subject to equivalent privacy protections.

9.0 Security

OCIC takes reasonable technical and organizational measures to protect personal information against unauthorized access, use, alteration, or disclosure. These measures include secure server infrastructure, encrypted data transmission (HTTPS), access controls, and periodic security reviews. However, no method of transmission over the internet or electronic storage is completely secure. While OCIC strives

to use commercially acceptable means to protect personal information, we cannot guarantee absolute security.

10.0 Privacy Breach

As soon as OCIC becomes aware of a possible infringement of our Privacy Policy, we will take immediate action to contain, investigate and remediate the situation and communicate with affected parties, as required by law and our breach management practice. In the unlikely event of a data breach, we will inform users of the data compromised and to inform them what steps occur next.

Individuals may ask us to delete any and all information OCIC has about them and we will endeavour to do so quickly.

11.0 Consent

Where required by law, we rely on an individual's express or implied consent to collect, use, and disclose their personal information. By providing OCIC with personal information, for example, through usage of OCIC's website, subscribing to OCIC's listserv, social media platforms or registering for OCIC events and activities, individual consent to gather personal information is implied and individuals' consent to the terms of OCIC's Privacy Policy. This Policy shall be made publicly available on [OCIC's website](#) to all users and subscribers. OCIC may amend this Policy from time to time and changes will be posted to our website; users will be asked to review the Policy periodically. Continued use of OCIC's website, listserv, social media platforms and event/activity registrations after the date that such changes are posted will be deemed to be an individual's implied consent and agreement to the changed terms.

If OCIC intends to use personal information for a new purpose, we will obtain consent from the individual before the personal information is used or disclosed for the new purpose. Individuals may withdraw their consent at any time, subject to legal or contractual restrictions, by contacting us as described in Section 13 below. Please note that withdrawal of consent may affect our ability to provide certain services to individuals who have withdrawn consent.

12.0 Children's Privacy

OCIC's website and services are not directed to children under the age of 13. We do not knowingly collect personal information from children under 13 without verifiable parental consent.

13.0 User Rights and Contact

To review or update an individual's personal information in the possession of OCIC, or to withdraw consent for the collection, use and/or disclosure of one's personal information or name from an email or other mailing list, those individuals are asked to contact OCIC at info@ocic.on.ca.

14.0 Complaint Process

Individuals may question compliance with the above principles. Questions, concerns and complaints about privacy, confidentiality and personal information handling policies and practices of the Council should be directed to OCIC's Director of Operations or Executive Director.

Challenges to collection, use or disclosure of personal information are to be resolved within a timely manner and complainants notified of their right to seek additional information or file complaints with the [Privacy Commissioner of Canada](#). All challenges and complaints will be responded to in writing.