



## USE OF PERSONAL INFORMATION FOR FUNDRAISING PROCEDURE

**PURPOSE** The purpose of this document is to provide instructions to members of the University community on how to collect, use, retain, disclose, and dispose of Personal Information for purposes of fundraising in compliance with the University’s Access to Information and Protection of Privacy Policy (“Access and Privacy Policy”).

**Part A**

**What to do if you wish to collect Personal Information for fundraising purposes**

**1. Provide notice to an individual when you are collecting their Personal Information**

If you wish to collect Personal Information on behalf of the University for fundraising purposes, you may do so if the information is reasonably necessary for the purpose of fundraising and you provide the following collection notice (whether over the phone or in writing):

Brock University protects your privacy and your Personal Information. The Personal Information [requested on this form/we are gathering] is collected under the authority of *The Brock University Act, 1964*, section 3, and in accordance with the *Freedom of Information and Protection of Privacy Act* (“FIPPA”). The information will be used to [specify purpose for collecting the Personal Information - e.g. for raising funds to support X]. Direct any questions about this collection to the [contact position], of the [your department] at Brock University at (905) 688-5550, ext. [XXXX] or see [www.brocku.ca/\[your departmental website\]](http://www.brocku.ca/[your departmental website])

## PART B

### When you may use Personal Information for fundraising

#### 1. Provide various forms of notice to the individual

If you wish to use Personal Information in alumni Records for fundraising purposes, you must provide notice to the alumni of their rights as follows:

- a. **When you first contact the individual:** when you first contact an alumnus for fundraising purposes, you must let the individual know that they have a right to request that their Personal Information no longer be used for fundraising purposes.

Sample wording: Brock University respects your privacy. Under the *Freedom of Information and Protection of Privacy Act (FIPPA)*, you have a right to request that your Personal Information cease to be used for fundraising purposes. Please let us know if you no longer wish to be contacted by Brock for fundraising purposes.

- b. **Periodic notice:** You must give notice periodically and in the course of fundraising notify the alumnus of his or her right to request that his or her Personal Information no longer be used or disclosed for fundraising purposes.
- c. **Published notice:** You must publish a notice, periodically and in a manner that is likely to come to the attention of individuals who may be solicited for fundraising, of the individual's right to request that his or her Personal Information no longer be used or disclosed for fundraising purposes. For example, you may include the notice in Brock's Surgite publication newsletter to alumni.

#### 2. Abide by request to cease use

If an alumnus asks that the University ceases using their Personal Information for fundraising purposes, you must comply with the alumni's request.

## PART C

### When you may disclose alumni's Personal Information for

#### 1. Requirements for disclosing Personal Information to a third party

If you have provided alumni with the notices set out in Part B above, you may disclose Personal Information in the University's alumni Records for the purpose of the University's fundraising activities if the University and the

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third party who receives the information enter into a written agreement and the Personal Information is reasonably necessary for the fundraising activities.

**2. What must be in the written agreement**

A written agreement with a third party who you wish to disclose Personal Information to must:

- Ensure the notice requirements set out in Part B above are satisfied;
- Require that the Personal Information be disclosed to the individual to whom it relates upon his or her request; and
- Require the person receiving the information to cease using the Personal Information of any individual who requests the information not to be used.

**3. Confidentiality & Privacy Undertaking**

If you wish to disclose alumni's Personal Information to a third party for fundraising purposes, contact the Manager, Privacy & Records Management to establish if disclosure presents a level of risk that requires the signing of Brock's Confidentiality & Privacy Undertaking template.

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