

## **Privacy Statement**

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### **Last Updated: November 16, 2021**

*We may make changes to this Privacy Statement from time to time. When we make changes to this Privacy Statement, we will change the “last updated” date at the top of this Privacy Statement. If possible, we will post notices of significant changes on our website before they take place. Your continued use of our services or website after any changes are made signifies your agreement with the terms of the revised Privacy Statement.*

### **Personal Information**

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"Personal Information" means information about an identifiable individual, including any information about you or that can be used to identify you. Protecting your privacy and the confidentiality of your Personal Information is of utmost importance to Toronto Police Widows and Orphans Fund (TPWOF). You can be confident that we are committed to protecting your Personal Information including your name, date of birth, gender, employment start and status, contact information, and personal health information.

### **How We Collect Information**

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We will only collect Personal Information that is relevant and consistent to and consistent with the purposes of the collection. Whenever practical, we will collect the required Personal Information directly from you, verbally, in completed applications and forms, through our website and through other means of correspondence such as the telephone, fax, mail or email. We may automatically collect technical data about your equipment and browsing history when you use our website. We may collect Personal Information about you from the Toronto Police Services in the course of our normal application and dues collection activities.

### **We Will Obtain Your Consent**

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We collect, use or disclose your Personal Information with your knowledge and consent. Your consent may be express or it may be implied, and you may give it to us verbally, electronically or in writing. You may withdraw your consent to collect, use or disclose your Personal Information at any time subject to legal and contractual restrictions and by providing us with reasonable notice. Withdrawals of consent cannot be retroactive. We will let you know if your withdrawal of consent could have any consequences, such as our not being able to provide you with products or services.

## **How We Use Personal Information**

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We may use your Personal Information to:

- Verify your identity
- Understand your needs
- Determine your eligibility for products and services
- Provide you with the full range of products and services you are eligible for
- Complete requested transactions
- Respond to any special needs or inquiries you may have
- Communicate with you in a timely and efficient manner
- Detect and prevent fraud
- Disclose or share your Personal Information when required, as described in this privacy statement
- Provide, administer and protect our website
- Comply with regulatory, statutory, contractual, or other legal requirements
- For other purposes that we have told you about and for which you have given us your consent.

We will only use or disclose Personal Information for the purposes for which it was collected, unless we have your consent to use it for a different purpose or if we are required by law. If we want to use or disclose your Personal Information for a new purpose, we will advise you of this purpose in writing and obtain your consent.

Providing us with your Personal Information is always your choice. However, your decision to withhold particular details may limit or prevent us from providing the products or services you have requested. The withholding of information may also impact how a claim is processed.

## **Sharing Your Information**

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Your Personal Information is not shared with other organizations except as necessary when processing membership applications. We may share Personal Information with the parties set out below for the following purposes:

- Toronto Police Services in order to deduct our dues from your pay
- Your employer, to confirm your employment status

- Outside service providers, as described in more detail below
- Professional advisors, such as lawyers, auditors, bankers and insurers who provide us with legal, accounting, auditing, banking and insurance services.

Your Personal Information may be stored or processed in jurisdictions outside of Canada and therefore may be subject to access requests according to the laws in those jurisdictions. Prior to our contracting with any outside provider, a nondisclosure agreement or similar agreement shall be executed with such provider, with confidentiality obligations at least as restrictive as those contained herein.

In addition, we may disclose Personal Information as otherwise permitted or required by law. The TPWOF requires all third parties to respect the security of your Personal Information and to treat it in accordance with applicable legal requirements.

## **Disclosures to Other Third Parties**

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The TPWOF will not disclose Personal Information about you to other third parties that may include your spouse, power of attorney, brokers and financial advisors, without current, written consent from you in a form acceptable to TPWOF.

## **Outside Service Suppliers**

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We may use service providers to perform specialized services on our behalf such as printing, research, marketing, mail distribution, application development, web hosting, system maintenance and administration or data processing. Our service providers may at times be responsible for processing or handling Personal Information. They are provided only the information necessary to perform the services. In addition, we require them to protect the information in a manner that is consistent with our privacy policies and security practices. TPWOF makes all third-party service providers aware of the importance of maintaining the privacy and security of Personal Information. All third-party service providers are required to enter into contractual agreements with us that prevent them from using your Personal Information for their own purposes and require them to use your Personal Information only for specific purposes in accordance with our instructions and all applicable legal requirements.

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## **How We Will Protect Your Personal Information**

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TPWOF makes all employees aware of the importance of maintaining the privacy and security of Personal Information. All TPWOF employees must sign a confidentiality agreement. We will take reasonable steps to keep Personal Information protected against loss, theft, snooping, hacking or unauthorized collection, use or disclosure. We use security safeguards appropriate to the sensitivity of the information. Our methods of protection include physical, administrative and technological safeguards, along with appropriate processes, to protect Personal Information from unauthorized access or use.

While we are committed to protecting your Personal Information, our security practices and measures cannot guarantee absolute security of Personal Information and we cannot ensure or warrant the security of any information you provide to us. You can reduce risk to your own Personal Information by following best practices.

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## **We Will Limit How Long We Keep Information**

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We will keep your Personal Information only as long as it is necessary to achieve the purposes for which it was collected or for such longer period as may be required by law, our regulators or our insurers. We securely destroy Personal Information so that reconstruction is not reasonably possible to prevent unauthorized parties from gaining access to Personal Information.

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## **Your Right to Access Your Personal Information**

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You have the right to ask whether we hold any Personal Information about you and to have access to that information. You also have the right to know how we collected your Personal Information, how we are using it, and to whom it may have been disclosed. If you believe any of the Personal Information, we have collected about you is incorrect or incomplete, you have the right to ask us to change it. If you show that your Personal Information is inaccurate or incomplete, we will make the necessary changes. Please contact the Privacy Officer at [chiefprivacyofficer@tpwof.ca](mailto:chiefprivacyofficer@tpwof.ca).

## **How to Register Complaints**

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You may challenge the accuracy and completeness of the Personal Information or our compliance with this privacy statement by contacting our Privacy Officer at [chiefprivacyofficer@tpwof.ca](mailto:chiefprivacyofficer@tpwof.ca). You may also register a complaint by accessing our complaints process at [complaints@TPWOF.ca](mailto:complaints@TPWOF.ca). We will explain our complaint procedure to you and investigate all complaints. If a complaint is justified, we will take all appropriate steps to set the situation right, including changing our policies and practices if necessary. We will also let you know what other complaint procedures may be available to you.

Privacy Officer, President and CEO

Toronto Police Widows & Orphans Fund

Suite 200, 2075 Kennedy Road, Toronto ON M1T 3V3

Email: [sylvi.karr@tpwof.ca](mailto:sylvi.karr@tpwof.ca)