

Privacy Policy

1. PURPOSE

This Privacy Policy outlines Women Building Futures' commitment to the responsible handling of personal information in compliance with applicable legislation.

2. SCOPE

This policy applies to all personal information collected, used, stored, protected and disclosed by Women Building Futures across all programs, services, communications, and technologies. It governs the actions of employees, contractors, volunteers, and anyone acting on behalf of the organization in relation to personal information.

3. DEFINITIONS

"Applicable Privacy Laws and Legislations" – Refers to privacy legislations applicable to WBF as per provincial and/or federal privacy laws and jurisdictions where WBF operates and conducts business. Examples of such legislations are *ATIA*, *POPA*, *PIPA*, *FIPPA* and/or *PIPEDA*.

"Organization" – Women Building Futures Society (WBF).

"Clients" – Individuals or organizations who engage with or receives services from Women Building Futures.

"Personal Information" – Information about an identifiable client, including but not limited to an individual's name, birth date, physical description, medical history, home address, gender, marital or family status, an identifying number, financial, educational and employment history information, and visual images such as photographs and videotape where individuals may be identified.

"Privacy Officer" – The designated individual within Women Building Futures responsible for overseeing compliance with privacy legislation, developing and implementing policies and procedures related to privacy, and responding to inquiries, access requests, and concerns about personal information

“Privacy Commissioner” – The independent authority who oversees and enforces privacy legislation, investigates complaints, and promotes awareness and education on privacy rights and obligations. In Alberta, this role is held by the Office of the Information and Privacy Commissioner or OIPC.

“ATIA” – Access to Information Act (Alberta) – ATIA establishes rights for persons to access records, as defined in the ATIA, that are in the custody or control of public bodies subject to limited and specific exceptions; this new legislation along with POPA replaced FOIP or Freedom of Information and Protection of Privacy Act in 2025.

“POPA” – Protection of Privacy Act (Alberta) – POPA establishes privacy rights for Albertans concerning personal information. It also permits public bodies to collect, use or disclose personal information in new ways, including for data matching and to create non-personal data; this new legislation along with ATIA replaced FOIP or Freedom of Information and Protection of Privacy Act in 2025.

“FOIP” – Freedom of Information and Protection of Privacy Act (Alberta) – In Alberta, this legislation was replaced with AITA and POPA legislations in June 2025.

“PIPA” – Personal Information Protection Act (Alberta) – Legislation regulating how private sector organizations manage personal information in Alberta.

“FIPPA” – Freedom of Information and Protection of Privacy Act (Ontario) – Ontario’s provincial law that governs how public institutions handle personal information and public records.

“PIPEDA” – Personal Information Protection and Electronic Documents Act (Federal) – Canada’s federal privacy law for private-sector organizations engaged in commercial activities.

4. POLICY STATEMENT

Women Building Futures Society (WBF) recognizes the importance of privacy and acknowledges the sensitivity of personal information received in the course of WBF operations and activities. WBF is fully committed to meeting its obligation to maintain the confidentiality of WBF clients’ information and its obligations concerning the personal information of all individuals that WBF collects, uses, discloses, protects and/or disposes of while conducting its business. This policy has been developed with the commitment of meeting those obligations in mind.

Alongside this Policy, WBF has prepared a Privacy Statement (refer to **Appendix A**), which will be accessible to WBF clients and visitors to the website to obtain consent.

5. POLICY

The Canadian (Federal) *Personal Information Protection and Electronic Documents Act (PIPEDA)* sets out the rules for the collection, use, protection and disclosure of personal information in the course of commercial activities and applies to private sector businesses, as well as not-for-profit and charitable organizations across Canada where no provincial privacy legislation exists. The provinces of Quebec, British Columbia, and Alberta, have their own provincial privacy legislation which are widely regarded as very similar to *PIPEDA*.

As a registered not-for-profit organization and charity that operates in Canada, WBF is accountable to *PIPEDA* given that the organization handles personal information in multiple provinces that crosses provincial borders. WBF acknowledges the importance of privacy and is therefore committed to complying with the federal legislation, as well as provincial privacy legislation (when applicable) in each jurisdiction in which it operates, including in Alberta.

This policy establishes the governing principles of WBF as it relates to the protection of privacy and identifiable information in the organization to meet those requirements and standards. Further, as WBF works closely with the Government of Alberta, WBF has also developed this policy to be in compliance with the protection of privacy sections under the *ATIA* and *POPA*.

WBF collects, uses, discloses, protects and disposes of personal information directly from individuals and clients that wish to participate in WBF activities and services. By engaging with WBF and prior to sharing their personal information, individuals will be asked to confirm their consent to sharing their personal information – this will ensure clients have a full understanding how their personal information will be collected, used, disclosed, protected and disposed of. When a third party is used to support WBF operations, these third-party contractors are bound by law to use this information entrusted in them consistent with provincial and federal privacy laws.

Collection, Consent, Use, and Disclosure of Personal Information

(a) Collection

WBF collects personal information in accordance with the provisions of applicable privacy laws and legislations. WBF collects personal information only for purposes that are necessary for WBF to enable the support and provision of services to its clients. Before or at the time of collection of personal information, clients will be asked for consent.

WBF requires information to:

- Understand, access and assist WBF clients with ongoing needs
- Verify WBF client's identity
- Ensure information is accurate and up to date

- Provide educational and other services, including evaluating and processing admission applications, and as part of client's contractual (employment) relationship with WBFF
- Inform clients and prospective clients about new offerings, programs and/or prospective employment opportunities
- Comply with legal and governmental requirements
- Other reasonable purposes (including archival and research) consistent with the objectives of WBFF and compliant with the related privacy legislation

The types of personal information that WBFF may collect about an individual include, but are not limited to the following:

- Name
- Home address
- Telephone number
- Email address
- Date of birth
- Gender
- Social Insurance Number (SIN)
- Driver's License Information
- Marital Status and family information (as applicable)
- Indigenous status (as applicable)
- Income and financial information, employment information, billing and account information
- Other information incidental to providing services which may be collected in accordance with the provisions of applicable privacy laws and legislations.

Disposal

In all cases, collection of personal information will be limited to only information WBFF requires to fulfil its obligations to its clients. Information that is no longer necessary will be appropriately disposed of. WBFF and its personnel are committed to disposing of personal information consistent with provincial and federal privacy laws.

As per the WBFF Information Management Policy (TBA), the retention schedule for all personal information held by WBFF will be adhered to, ensuring any personal information is appropriately disposed of upon:

- Expiry of the amount of time WBFF is required to maintain it, or
- WBFF no longer requires personal information to fulfil its obligations

(b) Consent

WBF will request either written or express oral consent from an individual, which may be given in person or over the telephone once their identity is authenticated.

There are certain extenuating circumstances where WBF is required or permitted by law, to collect, use and disclose personal information without consent. Such circumstances are described and listed in the applicable privacy laws and legislations.

Consent may be given in the following ways:

- Initial contact with WBF. When individuals reach out to WBF either by phone, email or through the general WBF Website, WBF may determine that consent for the collection, use and disclosure of limited personal information (i.e. name, phone number and email) has been implied to initiate individuals/WBF interactions. When additional personal information is required, consent will be sought
- Client Portal. Clients will be asked to consent to sharing their personal information prior to proceeding with entering their personal information in the WBF Client Portal Web access
- Admission and file processing. Consent is confirmed (verbal interaction) and recorded to allow for this necessary process to determine client's suitability for WBF program or service

Withdrawing consent

On giving reasonable notice to WBF, an individual may at any time withdraw or vary their consent to the collection, use, or disclosure by WBF of their personal information subject to the exceptions detailed in applicable privacy laws and legislations. If WBF receives notice to withdraw or vary an individual's consent, WBF will inform the individual of the likely consequences of withdrawing or varying their consent, unless the likely consequences of withdrawing or varying consent would be reasonably obvious to the individual.

(c) Use

WBF will use personal information to provide services to clients and to administer WBF business.

WBF will use personal information only for purposes that are reasonable and to the extent the use of the personal information is reasonable for meeting the purposes for which the personal information is used.

With an individual's permission, WBF may send clients information about WBF other services, or about upcoming events and new programs WBF may have to offer. An individual may at any time withdraw consent by notifying us, and WBF will not send any further materials.

(d) Disclosure

WBFF will not disclose or sell personal information or business contact information to any third party to enable them to market their products or services.

Personal information will only be disclosed if it is reasonable, necessary or beneficial to the provision of services to WBFF clients or to the extent it is reasonable for meeting the purposes for which the information is disclosed. Information may be disclosed to the following sources:

- WBFF staff and agents who use the information for the reasonable business purpose of providing an individual with client services
- To a third party WBFF contract to provide administrative and other services to the organization. These third-party contractors are bound by law not to use this information in a way that would be inconsistent with the privacy laws of Alberta
- Professionals working with us such as WBFF accountants, lawyers, or other service professionals
- Archival and Research institutions

Compliance

This policy will be reviewed on an annual basis in relation to any changes to privacy legislation that apply to WBFF or application of incident learnings. All revisions to this policy require approval of the Board of Directors before implementation.

Organizational onboarding and offboarding procedures related to WBFF staff, volunteers, Board of Directors, and agents will ensure levels of authorized access to personal information under WBFF's care are maintained and safeguarding is upheld and are consistent with the confidentiality clauses of their respective agreements.

WBFF will provide - at onboarding, and biennial thereafter - training for all WBFF employees, agents, and the Board of Directors to maintain understanding and awareness of the requirements, best practices and expectations for protection of privacy and handling of personal information at WBFF.

Any actions by employees and agents found to be non-compliant with this Policy or federal or provincial privacy legislation may result in disciplinary action, up to and including termination with cause, or removal from the Board of Directors.

Protection (Safeguarding Information)

WBFF recognizes its obligations to protect confidential information of WBFF clients. WBFF further recognizes its obligations to protect personal information in WBFF custody or control. WBFF has

therefore made arrangements to secure against the unauthorized access, collection, use, disclosure, copying, modification, disposal, or destruction of personal information in accordance with applicable federal and provincial privacy laws.

Access

Requesting access to personal information. Applicable privacy laws and legislations dictate that every organization that collects personal information about an individual gives that individual access to the personal information that they have in their custody or control upon request subject to the exceptions outlined in applicable privacy laws and legislations. Furthermore, applicable privacy laws and legislations require that the organization must state the purposes for which the personal information has been and is being used and the circumstances and names of all persons to whom this personal information has been and is being disclosed to. If WBF, in response to a request, refuses to provide information about the purposes for which the personal information has been and is being used by WBF and the names of the persons to whom and the circumstances in which the personal information has been and is being disclosed, WBF will inform the individual of the name of the person who can answer the individual's questions on behalf of WBF about the refusal and that the individual may ask for a review as outlined in applicable privacy laws and legislations.

Any individual may request access to their personal information by directing a written request to WBF's Privacy Officer, as identified below. WBF will respond to written requests in the time allowed under applicable privacy laws and legislations. Furthermore, WBF are permitted by law to charge a reasonable fee for retrieval and copying of personal information; notification of the amount to be communicated prior to us completing the request. If the fee is going to be extensive due to a large volume of information, a deposit may be required in advance of receiving the information.

Denial of access to personal information

There are two sets of specific circumstances where an individual may be denied access to her/his personal information.

First, the following list describes circumstances where WBF may refuse access:

- The information is protected by any legal privilege
- The disclosure of the information would reveal confidential information that is of a commercial nature, and it is not unreasonable to withhold that information
- The information was collected for an investigation or legal proceeding
- The disclosure of the information might result in that type of information no longer being provided to the organization when it is reasonable that that type of information would be provided

- The information was collected by a mediator or arbitrator or was created in the conduct of a mediation or arbitration for which the mediator or arbitrator was appointed to act under an agreement, under an enactment, or by a court
- The information relates to or may be used in the exercise of prosecutorial discretion

Secondly, the following list describes circumstances where WB&F must refuse access:

- The disclosure of the information could reasonably be expected to threaten the life or security of another individual
- The information would reveal personal information about another individual and the personal information cannot be reasonably severed from a copy of the record
- The information would reveal the identity of an individual who has in confidence provided an opinion about another individual and the individual providing the opinion does not consent to disclosure of his or her identity and the information cannot reasonably be severed from a copy of the record.

Revisions to Personal Information

WB&F make every reasonable effort to ensure that personal information is accurate and complete. WB&F relies on individuals to notify us if there is a change to their personal information that may affect their relationship with WB&F organization. If a client becomes aware of an error in their personal information, the client should make WB&F aware of the error as soon as feasible.

Applicable privacy laws and legislations permit individuals to submit written requests to organizations to correct errors or omissions about the individual in the personal information that is in the custody or under the control of the organization. If WB&F receives a written request to correct an error or omission, WB&F will, as soon as reasonably possible, correct the personal information and, if reasonable to do so, send correction notifications to any other organizations to whom WB&F disclosed the incorrect information. WB&F may make a determination to not make the correction requested. If WB&F makes a determination to not make the correction, WB&F will annotate the personal information under its control with the correction that was requested but not made.

WB&F will notify the individual who submitted the written request of the action taken by WB&F, of the name of the person who can answer any question about the request for correction on behalf of WB&F, and that the individual may ask for a review of the decision under applicable privacy laws and legislations.

Information Regarding Website Practices and Cookies

Cookies are an essential part of how the internet works today, and they allow Web servers to recognize the client's computer's browser when the client returns. When clients enter WB: F site, a cookie is set on client's hard drive so that WB: F site can be easily located by client's browser on future visits. Although the information is stored on a client's hard drive, a cookie can never look at the contents of client's hard drive or deliver information on client's hard drive to others. When clients visit WB: F site, WB: F may collect and store information about client's visit.

If clients wish to opt-out, or have the cookies removed, clients can simply delete them from their browsing history. Clients may choose not to accept cookies by changing user preferences on Client's browser.

Links to External Sites

Links to external Websites are provided for as a convenience and WB: F assumes no responsibility or liability for such linked sites. These other sites may send their own cookies to clients, collect data or solicit personal information. Clients should check the privacy policy of any Website they visit.

Communications by Email

E-mail is not a secure or confidential method of communicating confidential and personal information with WB: F. WB: F will not use e-mail to send personal or confidential information unless clients expressly authorize this form of communication and accept all the inherent risks associated with this type of communication.

Canada's Anti-Spam Legislation ("CASL")

WB: F complies with CASL and WB: F is committed to making sure clients only receive the electronic messages they want from WB: F. WB: F will never send unsolicited electronic messages in connection with the marketing of WB: F, its services or products.

WB: F may send electronic messages to clients who have signed up to join WB: F electronic messages list. WB: F occasionally sends electronic messages to members of mailing lists shared with WB: F from other organizations who have received client's opt-in consent, WB: F may occasionally contact clients to expressly notify clients about updates to WB: F Website or new products or services offered by WB: F, or to deliver targeted information that may be of interest to clients.

No matter how a client joins WB: F list or opts-in to consent to receive communications, at the bottom of all WB: F electronic messages, clients will find a clear, easy way to unsubscribe.

For more information about WBFF anti-spam policy or if you have questions or a complaint related to CASL, please contact WBFF Privacy Officer as set out in the “Contact Information & Resources” section of this Privacy Policy.

Changes to Privacy Policy

WBFF may review and change WBFF Privacy Policy from time to time in order to update WBFF privacy commitment to clients in keeping with current privacy laws.

Breach Reporting

Should WBFF become aware of a potential breach of privacy involving identifiable information, the organization will take the following steps to respond swiftly and responsibly:

- (A) The Privacy Officer will promptly initiate a preliminary internal investigation to assess the nature, scope, and impact of the breach. This includes identifying the type of information exposed, how the breach occurred, and whether the breach is ongoing. The investigation also determines whether any immediate containment actions are necessary to prevent further exposure
- (B) If the investigation concludes that a breach of privacy has indeed occurred, the Privacy Officer will contact the affected individuals directly and without undue delay. The notification will include:
 - a. A summary of the breach and what information/parties were involved
 - b. Steps WBFF has taken or is taking to mitigate the impact
 - c. Any recommended actions the individual should take (e.g., monitoring accounts, changing passwords)
 - d. Contact details for further inquiries or concerns
- (C) The Privacy Officer will determine and, if necessary, will file a formal self-report to the Office of the Information and Privacy Commissioner (OIPC) or any other applicable oversight body as per applicable privacy laws and legislations. The report will detail:
 - a. The circumstances surrounding the breach
 - b. Timeline of events
 - c. Mitigation strategies implemented
 - d. Communications with the impacted individual
 - e. Steps being taken to prevent future incidents
- (D) Following the OIPC’s (or equivalent as per applicable privacy laws and legislations) review, if applicable, WBFF will fully cooperate with any follow-up actions or requests for additional information. All recommendations provided by the OIPC will be carefully evaluated, findings presented to the Board of Directors, and recommendations implemented to reinforce WBFF’s data protection standards and prevent recurrence. This may include updating internal privacy policies and procedures, enhancing staff training, or modifying systems and technologies.

Contact Information & Resources

Questions with respect to WB: F policies concerning the handling of personal information, or if a client wishes to request access to, or correction of, their personal information under WB: F care and control, please contact WB: F Privacy Officer at:

Women Building Futures Society

CONFIDENTIAL

Attention: WB: F Privacy Officer

10326 – 107 Street

Edmonton, Alberta, T5J 1K2

Telephone 1-780-452-1200

Email: admin@womenbuildingfutures.com

If anyone is dissatisfied with WB: F's handling of personal information, they may contact WB: F Privacy Officer in writing, setting out the reasons for concern. If, after WB: F Privacy Officer has reviewed and responded to concerns, the individual remains dissatisfied, they may wish to contact the Privacy Commissioner (Alberta only) at:

Office of the Information and Privacy Commissioner of Alberta

410, 9925-109th Street

Edmonton, Alberta, T5K 2J8

Telephone: (780) 422-6860

Website: <http://www.oipc.ab.ca>

For other provincial and/or federal privacy officer, please refer to the applicable privacy laws and legislations.

6. FREQUENCY OF REVIEW

This Privacy Policy and Privacy Statement shall be reviewed by WB: F's Privacy Officer annually, or as required by changes in legislation, organizational practices, or risk assessments. Updates will be recommended to the Governance Committee of the Board of Directors, communicated to all staff and published on MyWB: F portal.