



PRIVACY POLICY

Kids Up Front Foundation (Calgary) (“**KUFF**”) takes privacy very seriously. KUFF is committed to protecting the confidentiality and security of Personal Information entrusted to it and ensuring that all Personal Information KUFF holds is collected, used and disclosed in compliance with all applicable federal and provincial privacy legislation, including the *Personal Information Protection Act* (Alberta) (“**Privacy Legislation**”). All Personal Information obtained from any individual is handled with the strictest confidentiality.

DEFINITION

Within this Privacy Policy, “**Personal Information**” means information about an identifiable individual. Personal Information does not include publicly available information such as business contact information which includes an individual’s name, position name or title, business telephone number, business address, business e-mail, business fax number and other similar business information; information that has been made anonymous, or aggregated information that cannot be associated with a specific individual.

SCOPE

This Privacy Policy applies to KUFF, its employees, potential or existing clients, and donors (the “**Clients**”). In addition, contractors, consultants, agents, auditors, and other third party service providers are bound to comply with this Privacy Policy and KUFF’s practices governing the protection of Personal Information and privacy.

COLLECTION OF INFORMATION

KUFF will document the purposes for which Personal Information is collected and will only collect Personal Information for the identified purposes.

KUFF will specify to the individual, orally, electronically or in writing, the identified purposes at or before the time Personal Information is collected. Upon request, persons collecting Personal Information will explain these identified purposes or refer the individual to the Privacy Officer of KUFF who will explain the purposes.

In accordance with Privacy Legislation, KUFF will identify and document any new purposes for which previously collected Personal Information may need to be used and disclosed, and obtain the consent of the individual where applicable.

KUFF will collect, use and disclose Personal Information in accordance with Privacy Legislation and will limit the amount and type of Personal Information collected to that which is necessary to fulfill identified purposes.

CONSENT

KUFF will seek consent, where required, to collect, use and disclose Personal Information when it collects the information or in accordance with Privacy Legislation. In obtaining consent, KUFF will ensure that an individual is advised of the identified purposes for which Personal Information will be used or disclosed. Purposes will be stated in a manner that can be reasonably understood. In determining the appropriate form of consent, KUFF will take into account the sensitivity of the Personal Information, the reasonable expectations of the individuals involved, and the requirements of Privacy Legislation.

An individual may withdraw his or her consent to the collection, use and disclosure of Personal Information in accordance with this Privacy Policy at any time upon reasonable notice to KUFF in writing, subject to legal or contractual restrictions. The withdrawal of the Client's consent may affect KUFF's ability to continue to provide an individual with the products and services that the individual has or would like to receive.

DISCLOSURE OF INFORMATION

Unless required by Privacy Laws or relevant tax legislation, the disclosure of Personal Information with third party sources will not occur without the written consent of the individual and disclosure of Personal Information will be limited to the amount and type of Personal Information collected to that which is necessary to fulfill the identified purpose.

KUFF will maintain a record of the third parties that Personal Information is disclosed to in accordance with this Privacy Policy.

In a very limited number of circumstances, KUFF may disclose your information to third party service providers who help KUFF administer its relationship with you in the normal course of business (e.g. to a bank for payment process, to financial bookkeepers or auditors). KUFF only shares information that is necessary for the service provider to provide KUFF with the service. KUFF service providers are contractually bound to keep your information confidential, to safeguard your information, to limit their use of your information to the purpose of rendering their service, and to destroy or return your information when it is no longer required.

RETENTION & DESTRUCTION

KUFF will keep Personal Information only as long as it remains necessary or relevant for the identified purposes or as required by law.

KUFF will maintain reasonable and systematic controls, schedules and practices for Personal Information and records retention and destruction which apply to Personal Information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information will be destroyed, erased or made anonymous. KUFF will take all reasonable steps in the disposal or destruction of Personal Information, to seek to prevent unauthorized parties from gaining access to the Personal Information, including shredding paper records and permanently deleting electronic records.

SECURITY SAFEGUARDS

KUFF will use its commercial best efforts to protect Personal Information against loss or theft, as well as unauthorized access, disclosure, use, modification or destruction, through reasonable security measures. The nature of the safeguards will vary depending on the sensitivity of information collected.

KUFF will take all reasonable steps in the disposal or destruction of Personal Information to seek to prevent unauthorized parties from gaining access to the Personal Information, including shredding paper records and permanently deleting electronic records.

ACCURACY

KUFF will employ reasonable efforts to keep Personal Information relevant to its intended use, accurate, complete and current. KUFF relies on individuals to notify it if there is a change to their Personal Information. KUFF will take reasonable steps to permit individuals to correct, amend or delete Personal Information that it demonstrated to be inaccurate or incomplete. These requests may be made in writing by contacting the Privacy Officer. KUFF will update Personal Information as and when necessary to fulfill the identified purposes or upon notification by the individual.

INDIVIDUAL ACCESS TO PERSONAL INFORMATION

Individuals have a right to access their own Personal Information that is in the custody or under the control of KUFF subject to some limited exceptions provided for in the Privacy Legislation. KUFF will grant individuals reasonable access to their Personal Information held by KUFF. KUFF will advise the individual in advance of any charges for retrieval, reproduction or delivery of the Personal Information requested.

KUFF may limit or deny access to Personal Information as permitted by applicable Privacy Legislation. KUFF will provide the reasons for denying access.

In order to safeguard Personal Information, an individual will be required to provide sufficient identification information to permit KUFF to authorize access to the Personal Information held regarding that individual. Any such identification information will be used only for this purpose.

Individuals can obtain information or seek access to their Personal Information by contacting the Privacy Officer.

CHALLENGING COMPLIANCE

KUFF will maintain procedures for addressing and responding to all inquiries or complaints from individuals about KUFF's handling of Personal Information.

KUFF's Privacy Officer in conjunction with the appropriate parties involved will investigate all complaints concerning compliance with this Privacy Policy. If a complaint is found to be justified, KUFF will take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures, or disciplinary action up to and including termination. An individual will be informed of the outcome of the investigation regarding his or her complaint.

KUFF will promptly correct or complete any Personal Information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness will be noted in the file in which the Personal Information is contained. Where appropriate, KUFF will notify third parties having access to the Personal Information in question about any amended information or the existence of any unresolved differences.

An individual that has concerns with KUFF's privacy practices should contact KUFF's Privacy Officer.

CROSS-BORDER TRANSFERS

KUFF may centralize certain aspects of its data process and administration in order to allow it to better manage its business. That centralization may result in the transfer of Personal Information from one country to another within the limits and subject to the requirements of Privacy Legislation. The countries where the information will be transferred may or may not have laws that seek to preserve privacy of the Personal Information. However, whenever Personal Information is transferred outside of the country, the Personal Information will be processed in accordance with the principals of this Policy and Privacy Legislation.

Individuals may obtain written information regarding cross-border transfers by contacting KUFF's Privacy Officer.

CONTACT INFORMATION

The contact information of the person currently designated as KUFF's Privacy Officer is:

Nicky Nash
privacycalgary@kidsupfront.com

CHANGES TO THIS POLICY

This Privacy Policy may be amended from time to time, consistent with the requirements of applicable laws or business needs. Appropriate notice will be given concerning such amendments.

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