

**Operation Migration Inc.  
and  
Operation Migration (USA) Inc.**

**PRIVACY POLICY**

Operation Migration Inc. and Operation Migration USA Inc (together "OM") recognizes the importance of privacy and the sensitivity of personal information. As registered charitable corporations we take seriously our obligation to keep confidential all personal information we receive from donors, supporters, members and others. We are committed to protecting any personal information we hold. This Privacy Policy outlines how we manage your personal information and safeguard your privacy.

*Your Privacy Rights*

Since January 1, 2004, all organizations engaged in Canada must comply with the *Personal Information Protection and Electronic Documents Act*, (the "Act") and the Canadian Standards Association Model Code for the Protection of Personal Information, which it incorporates. These obligations extend to charitable organizations in Canada, including OM. The Act gives you rights concerning the privacy of your personal information.

OM is responsible for the personal information we collect and hold. To ensure this accountability, we have developed this Privacy Policy, and trained our personnel about our policies and practices.

*Why Does OM Need Personal Information?*

OM keeps a database of members, donors and supporters of the good works we do. We rely on the information in the database to keep track of our membership and keep our members informed of our work in the field, to issue charitable receipts to donors, to keep people informed about special offerings of goods we sell in support of funding our charitable activities, and we solicit support from those that have in the past shown interest in our work and supported our fundraising needs.

*What personal information do we collect?*

Personal information is any information that identifies you, or by which your identity could be deduced. We collect and use your personal information because it is necessary to do so in order to inform, document donation and seek additional support. The information is relevant to accounting and invoicing, corresponding with you and often for proper documentation of tax deductible donations.

We also collect personal information about our employees in order to manage and administer their compensation and benefits.

*How do we collect your personal information?*

We collect information only by lawful and fair means and not in an unreasonably intrusive way. Wherever possible we collect your personal information directly from you, when you purchase a membership or make a donation. You may give us your personal information verbally, in correspondence or through donation or purchase options available through our website

Sometimes we may obtain information about you from other sources, for example, if we have obtained it from another organization that may lawfully give it to us for the uses described in this Privacy Policy.

*Consent*

In some cases, we shall ask you to specifically consent, if we collect, use, or disclose your personal information. Normally, we ask for your express oral or written consent. Sometimes, your consent may be implied through your conduct with us. For example, when you give us your mailing address along with a donation, we assume you have consented to the use of that address to mail a receipt, a thank-you or a newsletter to you.

By disclosing your personal information to us over the telephone, electronically, in writing or in person you consent to the collection, storage and processing of your personal information by OM as stated in this Privacy Policy.

By accepting employment with OM you consent to the collection, storage and processing of your personal information by OM as stated in this Privacy Policy.

#### Use of Your Information

We use your personal information to keep track of our membership and keep our members informed of our work in the field, to issue charitable receipts to donors, to keep people informed about special offerings of goods we sell in support of funding our charitable activities, and we solicit support from those that have in the past shown interest in our work and supported our fundraising needs, and to include you in any direct marketing activities we may undertake for events or offers that we believe will be of interest to you. If you tell us that you no longer wish to receive information about our work, or about our funding needs, we will not send any further material.

OM may disclose your personal information to some third parties that we have specially selected and approved to enable them to inform you about their products and services or to solicit support from you for their charitable activities. We will do so only in circumstances where we believe many our members and donors will have an interest in the product, service or charitable work of such third party.

#### Disclosure of your Personal Information

Under certain circumstances, OM will disclose your personal information:

- when we are required or authorized by law to do so, for example if a court issues a subpoena, or if Canada Revenue Agency or the Internal Revenue Service audits our charitable donation receipts;
- when you have consented to the disclosure;
- where it is necessary to establish or collect fees;
- if we engage a third party to provide administrative services to us (like computer back-up services or archival file storage) and the third party is bound by our Privacy Policy;
- if the information is already publicly known.

#### Updating Your Information

Since we use your personal information to provide services to you, it is important that the information be accurate and up-to-date. If any of your information changes, please inform us so that we can make any necessary changes.

#### Is My Personal Information Secure?

OM takes all reasonable precautions to ensure that your personal information is kept safe from loss, unauthorized access, modification or disclosure. Among the steps taken to protect your information are:

- premises security;
- restricted file access to personal information;
- deploying technological safeguards like security software and firewalls to prevent hacking or unauthorized computer access;
- internal password and security policies.

#### Access to Your Personal Information

You may ask for access to any personal information we hold about you. Summary information is available on request. More detailed requests which require archive or other retrieval costs may be subject to our normal professional and disbursement fees.

#### Correcting Errors

If OM holds information about you and you advise us that it is not accurate, complete and up-to-date, OM will take reasonable steps to correct it.

#### Can I be Denied Access to My Personal Information?

Your rights to access your personal information are not absolute. We may deny access when:

- denial of access is required or authorized by law;
- when granting you access would have an unreasonable impact on other people's privacy;
- to protect OM's rights and property;
- where the request is frivolous or vexatious.

If we deny your request for access, or refuse a request to correct information, we shall explain why. OM does not use your Social Insurance Number as a way of identifying or organizing the information we hold upon you.

Communicating with Us.

You should be aware that e-mail is not a 100% secure medium, and you should be aware of this when contacting us to send personal or confidential information. We may communicate with you by telephone, facsimile, in writing by mail and courier and by email. In each case we will take reasonable steps appropriate to the medium to protect your privacy.

Changes to this Privacy Policy

Since OM regularly reviews all of its policies and procedures, we may change our Privacy Policy from time to time.

Requests for Access

If you have any questions, or wish to access your personal information, please write to our Privacy Officer, Liz Condie at:

6 High St. Unit A  
Port Perry, ON L9L 1H8

If you are not satisfied with our response, the Privacy Commissioner of Canada can be reached at:

112 Kent Street,  
Ottawa Ontario, K1A 1H3  
1.800.282.1376.

Employment Inquiries

If you apply to OM for a job, we need to consider your personal information, as part of our review process. We may retain information from candidates after a decision has been made, unless you ask us not to retain the information. If we offer you a job, which you accept, the information will be retained in accordance with our privacy procedures for employee records.

Web Site

Our website contains links to other sites, which are not governed by this privacy policy. On our website, like most other charity websites, we may monitor traffic patterns, site usage and related site information in order to optimize our web service. We may provide aggregated information to third parties, but these statistics do not include any identifiable personal information.