



Canadian Gift Association (CanGift) Privacy Code

Accountability

- all employees with access to personal information are responsible for protecting information to which they have access
- we have strict policies and procedures for protecting personal information
- the Vice President Operations and Information Systems is the designated Chief Privacy Officer within CanGift
- the Chief Privacy Officer is responsible for overseeing privacy governance including policy, dispute resolution, education, communication activities and reporting to Executive Management

Identifying Purpose

- to verify your identity and protect against fraud
- to understand your service requirements
- to determine the suitability of offerings and services to you
- to determine your eligibility for certain of our products and services
- to set up and manage products and services you have requested
- to comply with legal and regulatory requirements
- your personal information may require verification through various sources or by various government issued documents

Obtain Consent

- after consenting to the collection of your personal information you may withdraw your consent providing:
 - you give us reasonable notice
 - we are not legally required to collect, use or disclose your personal information
 - withdrawing your consent does not prevent us from fulfilling our contract with you

Limit Collection

- CanGift only collects information necessary to conduct business with you
- the following personal or business information may be requested and retained in our files:
 - contact information including your name, mailing address, telephone number and email address
 - business documentation including but not limited to; Business License/Registration, Tax Documents, Company Credit Card, T4 Form. In all cases, you are encouraged to blank out personal information when providing sensitive documentation.
- you may choose to not provide certain information in certain situations, however, if you make this choice we may not be able to provide you with the products, services, or information you request

Be Accurate

- we strive to maintain accurate personal information about you in our database
- if you discover inaccuracies in our data, or your information changes, please contact us directly

Limit Use, Disclosure and Retention

- we will only use or disclose your information for the reason(s) it was collected
- CanGift does not sell or give personal information to other companies for their own use
- your contact information may be shared with a specific, third-party mailing house having a long-standing relationship of providing such services to CanGift for purposes of mass communications, including advertising from CanGift members. Members will not be provided with your contact information directly. You may opt out of such mailings by contacting our office or by indicating so on our registration form.
- the third-party mailing house will only be provided with the information necessary to provide such services
- personal or business information may be released to legal or regulatory authorities as required by law
- CanGift only retains personal or business information for as long as it fulfills its intended purpose or as legally required

Use Appropriate Safeguards

- we have comprehensive security controls to protect against unauthorized use, access, alteration, duplication, destruction, disclosure, loss or theft of your personal information
- these include physical, electronic and procedural safeguards to protect your personal information

Be Open

- CanGift privacy code is available online at www.cangift.org, simply click the privacy link at the bottom of the page
- from time to time changes may be made in our Privacy Code
- changes to our Privacy Code will be immediately up-loaded to the CanGift website

Give Individuals Access

- verification and review of the personal information we hold about you can be accessed following a formal request in writing
- we may need specific information from you to enable us to search for , and provide you with, the personal information we hold about you
- if we are unable to provide some of the personal information in our database we will let you know the reason(s) why

Provide Recourse

- should you have concerns which are not handled to your satisfaction by line staff, please feel free to contact one of the following offices:

Chief Privacy Officer
 Canadian Gift Association
 42 Voyager Court South
 Toronto, ON M9W 5M7
 (800) 611-6100

President and Chief Executive Officer
 Canadian Gift Association
 42 Voyager Court South
 Toronto, ON M9W 5M7
 (800) 611-6100

Office of the Privacy Commissioner of Canada
 Place de Ville, Tower B, 3rd Floor
 112 Kent Street
 Ottawa, ON KiA 1H3
 (800) 282-1376