


SUBJECT	PRIVACY POLICY	
APPROVED BY:		DATE: JUNE 13, 2023
	CHIEF EXECUTIVE OFFICER	SUPERSEDES:
		OCTOBER 7, 2019

ACCESS COMMUNITY CAPITAL FUND INC.

PRIVACY POLICY

Access Community Capital Fund Inc. (“ACCESS”) is a non-for-profit corporation under the laws of Canada and is registered as a charitable organization with the Canada Revenue Agency. At ACCESS we respect your privacy and the laws governing it and are committed to protecting and safeguarding the Personal Information you have entrusted to us. This policy statement is provided to you to state and affirm our commitment to maintaining your privacy and to inform you of the policies and practices we follow to protect the Personal Information of our clients, donors and others who access our website. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of Personal Information and allowing individuals to request access to, and correction of, their Personal Information.

Our obligations apply to all officers, employees, contractors, agents, and volunteers who provide services to or on behalf of ACCESS in connection with the delivery of products, services and information.

Definitions

Personal Information – means information about an identifiable individual, such as name, age, home address and phone number, personal email address, marital status, financial information, and details of your involvement with our organization. Personal Information does not include Business Contact Information (described below).

Business Contact Information – means information that would enable an individual to be contacted at a place of business. It includes name, position name or title, and business (i) telephone number (ii)

address, (ii) email and (iii) fax number, to the extent that such information is collected, used or disclosed, as the case may be, for the purposes of contacting an individual in that individual's capacity as an employee or official of an organization and for no other purposes. Business Contact Information is not covered by this policy.

Why ACCESS May Collect Personal Information

ACCESS collects information provided in writing (including via electronic media) or verbally about its donors and clients and does so primarily for the following purposes:

- to communicate with and to understand the needs of our donors and clients;
- to maintain a record of a person's involvement with our organization;
- to raise funds;
- to record and process donations;
- to provide income tax receipts;
- to manage our relationship with our donors and clients;
- to deliver requested services and products;
- to compile statistics, conduct market research and report to regulatory and industry agencies;
- to verify the identity of our clients and evaluate their loan applications;
- to obtain a credit information report or related financial history, verify our clients' current and ongoing creditworthiness and other information they have provided in connection with their loan application and provide credit information to potential creditors, credit bureaus and credit reporting agencies;
- to detect and prevent fraud;
- to meet legal, regulatory, security and processing requirements;
- to determine prices, fees and premiums;
- to analyze the suitability of our products or services for our clients;
- to investigate and settle claims;
- with their consent, to determine our clients' eligibility for products and/or services that may be of an interest to them from various business partners with whom ACCESS has formed an association, and offering these products and services to our clients;
- with their consent, to refer our clients to financial planning services;

- with their consent, to contact our clients to conduct market research;
- to provide our clients with ongoing services;
- to establish and maintain communications, and to respond to our clients' inquiries; and
- for other purposes, with our clients' consent or as permitted or required by law.

Consent

We will obtain the consent of our donors and clients before we collect, use or disclose Personal Information (except where, as noted below, we are authorized to do so without consent). Consent can be provided orally, in writing, electronically, or through an authorized representative, or it can be implied where the purpose for collecting, using or disclosing the Personal Information would be considered obvious and the individual voluntarily provides Personal Information for that purpose. Consent may also be implied where the individual concerned is given notice and a reasonable opportunity to opt out of his or her Personal Information being used for mailouts or to raise donations and the individual does not opt out.

Subject to a few exceptions (e.g., the Personal Information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation), individuals can withhold or withdraw their consent for ACCESS to use their Personal Information in certain ways. An individual's decision to withhold or withdraw their consent to certain uses of Personal Information may restrict our ability to provide particular services or products to that individual.

We may collect, use or disclose Personal Information without an individual's knowledge or consent when permitted by law including, by way of example:

- when the collection, use or disclosure is required or authorized by law;
- in an emergency that threatens an individual's life, health, or personal security;
- when the Personal Information is available from a public source (e.g., a website, social media account, etc.);
- when we require legal advice from a lawyer.

How ACCESS uses Personal Information

ACCESS only collects, uses, and discloses Personal Information for purposes that would be considered reasonable in the circumstances, and only such information as is required for the purposes of providing

products, services or information to our donors and clients. We are committed to using only fair and lawful methods to collect Personal Information.

Our use of Personal Information is limited to the purposes described in this policy. We do not use or disclose an individual's Personal Information for any additional purpose unless we obtain consent to do so.

When ACCESS May Disclose Your Personal Information

As a general rule, all information concerning our donors and clients is held in strict confidence and, except in limited circumstances, is not revealed to anyone else unless expressly or implicitly authorized by such individuals.

Personal Information collected by ACCESS is collected only for our own purposes, and we do not sell or share your Personal Information with outside organizations. There are, however, a few exceptions. We may provide Personal Information to outside loan funders, suppliers or contractors from whom we obtain services for the purposes of performing those services on our behalf. In the ordinary course of its operations, ACCESS does not sell, rent or lease its lists of donors or clients. There are occasions in which ACCESS might undertake one of these activities with your consent. In addition, ACCESS may, from time to time, contact you on behalf of our funders or program partners about a particular offering that be of interest to you, subject to the provisions of this policy.

We may also disclose Personal Information to meet regulatory requirements or otherwise without your consent, as required or permitted by law.

Where we are obliged or permitted to disclose Personal Information without consent, ACCESS will not disclose more information than is required.

Retention of Personal Information

In that we endeavor to maintain a lifelong relationship with our donors and clients, we may retain any Personal Information you provide for this purpose. We will, however, destroy personal information as soon as it is reasonable to assume that retention no longer serves the purposes for which it was collected and is no longer necessary for legal or business purposes.

When your Personal Information is no longer required by ACCESS, we have procedures to destroy, delete, erase or convert it into anonymous form.

Currently, the principal places in which ACCESS holds Personal Information are at its head office in Toronto, Ontario.

Ensuring Accuracy of Personal Information

ACCESS endeavours to ensure that any Personal Information provided by our donors and clients is as accurate, current and complete as necessary for ACCESS' uses and will make reasonable efforts to ensure its accuracy and completeness.

Individuals may request correction to their Personal Information in order to ensure its accuracy and completeness. A request to correct Personal Information must be made in writing and provide sufficient detail to identify the Personal Information and the correction being sought. A request to correct Personal Information should be directed to our Executive Director.

If the Personal Information is found to be inaccurate or incomplete, ACCESS will correct the information. If the correction is not made, we will note the correction request in the file.

Protection of Personal Information

ACCESS is committed to ensuring the security of Personal Information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risk. ACCESS endeavours to maintain appropriate physical, procedural and technical security with respect to its office and information storage facilities so as to ensure that Personal Information is appropriately protected. This also applies to our disposal or destruction of Personal Information.

ACCESS further protects Personal Information by restricting access to it to those employees that management has determined need to know that information for the provision of our services and products.

We routinely review our procedures and security measures from time to time to ensure that they remain adequate, effective, and appropriate.

Access to Your Personal Information

Our donors and clients who access our services and products have a right to access their Personal Information, subject to certain exceptions. For example, we may not be able to provide access to Personal Information if the information is protected by solicitor-client privilege, or if doing so would

reveal Personal Information about another individual. If access cannot be provided, ACCESS will notify the individual of the reasons for refusal.

A request to access Personal Information must be made in writing and provide sufficient detail to identify the Personal Information being sought. A request to access Personal Information should be directed to our Executive Director.

Upon request, we will also advise as to how an individual's Personal Information has been used and is being used and to whom it has been disclosed, if applicable.

Respecting your Preference

We will explain your options of refusing or withdrawing consent to the collection, use or disclosure of your Personal Information and, given reasonable notice, we will record and respect your choices. In most cases you are free to refuse or withdraw your consent at any time. You may do so by contacting us at (416) 462-0496 or by email at admin@accessccf.com. Our staff will be pleased to explain your options and any consequences of refusing or withdrawing your consent, and record your choices.

There are several privacy preferences available to you, subject to legal, business or contractual requirements. If you prefer, you may choose not to have us:

- send you our email newsletter; or
- contact you occasionally either by mail, telephone, or email, or all of these methods, with information about our services and products, and offering you further opportunities to support our work

You may not withdraw your consent for sharing of information with our funders for the purposes of their provision of loans to you.

Handling Inquiries and Complaints

ACCESS' Executive Director is accountable for ACCESS' policies and practices with respect to the management of Personal Information. In the event of any questions, concerns or complaints about our collection, use, management or disclosure of Personal Information or our privacy policies and procedures, please contact our Executive Director at: (416) 462-0496 or by mail at:

Executive Director
ACCESS Community Capital Fund Inc.
401 Richmond Street West, # 375
Toronto, Ontario
M5V 3A8

Evolving Practices

This policy is in effect as of September 8, 2018. The development of ACCESS' policies and procedures for the protection of Personal Information is an ongoing process. Due to changes in technology and legal requirements and other reasons, ACCESS will from time to time review and revise this policy. For a copy of the current version, please contact our privacy officer at the address set forth above or visit our Website at **www.accessccf.com**.

Approved as a policy of the Board of Directors on September 12, 2018.