

## ARCHEPARCHY OF WINNIPEG APP PRIVACY POLICY

The Archeparchy of Winnipeg respects your privacy and is committed to protecting your personal information. This privacy policy will inform you as to how we look after your personal information when you visit our App and/or website regardless of where you visit it from, and tell you about your privacy rights and how the law protects you.

By submitting personal information to the Archeparchy of Winnipeg or its service providers and agents (collectively referred to as the Archeparchy of Winnipeg, “we”, “us” or “our” in this Privacy Policy), you agree that we may collect, use and disclose such personal information in accordance with this Privacy Policy and as permitted or required by law. Subject to legal and contractual requirements, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting our privacy manager. If you refuse or withdraw your consent, we may not be able to provide you or continue to provide you with certain services or information which may be of value to you.

This Privacy Policy is provided in a layered format so you can click through to the specific areas set out below.

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### 1. WHO WE ARE

The Archeparchy of Winnipeg is a registered Canadian charity operating under the title The Ukrainian Catholic Episcopal Corporation of Manitoba. For the purposes of this App, we provide a platform to facilitate the fundraising efforts of our parishes and the Archeparchy of Winnipeg.

The Archeparchy of Winnipeg collects and processes personal information through the following areas of operations:

Our App for donors offers a user-friendly way for individuals to donate or fundraise for the various charities of the Archeparchy of Winnipeg including its individual parishes. The Archeparchy of Winnipeg collects and processes the donor’s personal information submitted through the App. At the donor’s express request, the Archeparchy of Winnipeg may also disclose personal information about its individual donors to the charities they support.

Our tools and services for the registered Canadian charities included in the App, are made available to charity representatives to use to collect donations and launch fundraising events online for the benefit of the charity they represent.

Our services are designed to promote and enable giving to the charities of the Archeparchy of Winnipeg. All donations made through our tools and services (whether through our App for donors, or our website) are made directly to the charity selected (who issues donors their tax receipts). The App processes the donated amount (minus its non-commercial service fee) on behalf of the registered charity selected by the donor (unless, of course, your donation is intended by you to be to the Archeparchy of Winnipeg alone, in which case your donation in support of our activities is gratefully received and retained by the Archeparchy of Winnipeg).

The registered charities that use the Archeparchy of Winnipeg App may require you to provide personal information directly to them in addition to the personal information that you provide to the Archeparchy of Winnipeg. Charities using our platform, and partners using our services, are required to agree to this Privacy Policy in its entirety. In addition, we have terms in place with each of our partners to ensure transparency to individuals using their services in regards to the role of the Archeparchy of Winnipeg and any associated fees.

## 2. WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

Personal information means any information about an individual from which that person can be identified. It does not include personal information where all references to the identity of the relevant individual have been removed (anonymous personal information).

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows.

Identity Personal information includes:

- username or similar identifier, first name, last name, title.
- Contact Personal information includes address, email address and telephone numbers.
- Financial Personal information includes bank account, credit card details.

Technical personal information includes internet protocol (IP) address, your login personal information, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this App.

Profile personal information includes your username and password, donations made by you, your interests, preferences, surveys, and feedback.

Usage personal information includes information about how you use our App and our Services.

We also collect, use and share aggregated personal information such as statistical or demographic information for any purpose. Aggregated personal information could be derived from your personal information but is not considered personal information in law as this information will not directly or indirectly reveal your identity. For example, we may aggregate your usage personal information to calculate the percentage of users accessing a specific App feature. However, if we combine or connect aggregated personal information with your personal information so that it can directly or indirectly identify you, we treat the combined information as personal information which will be used in accordance with this Privacy Policy.

We do not collect any special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric information). Nor do we collect any information about criminal convictions and offences.

If you provide the Archeparchy of Winnipeg with personal information of another individual, you represent that you have obtained all necessary consents from such person to enable us to collect, use and disclose such personal information for the purposes set forth in this Privacy Policy.

Certain features of this App may be accessed by children under the age of 18. We recommend parental consent before a minor uses the features of this App.

### 3. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We use different methods to collect personal information from and about you including through:

Direct interactions. You may give us your identity, contact, transaction and financial personal information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:

- Sign-up for an account and update your account;
- Make a donation (including one-time and/or recurring gifts, and receive a tax receipt, if applicable);
- Subscribe to a publication, some other feature of the app or to contact us or provide feedback;
- Third parties or publicly available sources. We will receive personal information about you from various third parties
- Contact, financial and transaction personal information from providers of technical, payment processing and delivery services.

### 4. WHY DO WE COLLECT AND USE YOUR PERSONAL INFORMATION?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where you consent to such collection and use, such as by consenting to this Privacy Policy.
- Where needed to perform the service you are requesting.
- Where we need to comply with a legal obligation.

Note that we may process your personal information for more than one lawful basis depending on the specific purpose for which we are using your personal information. Please contact us if you need details about the specific legal ground we are relying on.

### 5. TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION?

We may share your personal information with the parties set out above for the purposes set out above.

We require all third parties to respect the security of your personal information and to treat it in

accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

## 6. HOW DO WE PROTECT THE CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION?

We are committed to keeping the personal information provided to us secure and we will take reasonable precautions to protect personal information from loss, misuse or alteration.

We have implemented information security policies, rules and technical measures that are intended to protect the personal information that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification; and
- unlawful destruction or accidental loss.
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All of our members, employees, workers and personal information processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with, the processing of personal information, are obliged to respect the confidentiality of the personal information of all visitors to the App and all users of our services.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 7. HOW LONG WILL WE RETAIN YOUR PERSONAL INFORMATION?

We will only retain your Personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

In some circumstances you can ask us to delete your personal information: see Your Legal Rights section below for further information.

In some circumstances we will anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 8. YOUR LEGAL RIGHTS

The vast majority of our users (website and App) are Canadians and so our privacy policy has been drafted to help ensure compliance with applicable Canadian law.

### **Your right of access**

If you ask us, we will confirm whether we're processing your personal information and, subject to any applicable exemptions, provide you with a copy of that personal information within the timescales provided for by law. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. If you require additional copies, we may need to charge a reasonable fee.

### **Your right to rectification**

If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If you are entitled to rectification and if we've shared your personal information with others, we'll let them know about the rectification where possible and where this would not involve disproportionate effort. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

### **Your right to erasure**

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable because that was the legal basis on which we were processing your personal information). If you are entitled to erasure and if we've shared your personal information with others, we'll take reasonable steps to inform those others where possible and where this would not involve disproportionate effort. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

### **Your right to restrict processing**

You can ask us to "block" or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or you object to us. If you are entitled to restriction and if we've shared your personal information with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

### **Your right to personal information portability**

You have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

### **Your right to object**

You can ask us to stop processing your personal information, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or
- processing your personal information for direct marketing.

## **Your rights in relation to automated decision-making and profiling**

You have the right not to be subject to a decision when it's based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

## **Your right to withdraw consent**

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## **Your right to lodge a complaint with the supervisory authority**

If you have a concern about any aspect of the Archeparchy of Winnipeg's privacy practices, including the way we've handled your personal information, you can report it to the relevant supervisory authority.

## **9. CONTACTING US**

The Archeparchy of Winnipeg has appointed a Privacy Manager who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact our Privacy Manager using the details set out below.

If you have any questions about this Privacy Policy or our privacy practices, please contact our Privacy Manager in the following ways:

Archeparchy of Winnipeg  
233 Scotia St  
Winnipeg, Manitoba R2V 1V7  
chancellor@archeparchy.ca  
Telephone number: 204-338-7801

You have the right to make a complaint at any time to the relevant supervisory authority for personal information protection issues. In Canada, you can contact the Office of the Privacy Commissioner of Canada ("OPC"), see: <https://www.priv.gc.ca/en/contact-the-opc/>. EU data subjects can contact their relevant data protection supervisory authority. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority so please contact us in the first instance.

## **Links to Other Websites**

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share personal information about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our App or website, we encourage you to read the Privacy Policy of every website you visit.

## **Changes**

The Archeparchy of Winnipeg reserves the right to modify or supplement this Privacy Policy at any time. If any changes are made to this Privacy Policy, a copy of the Privacy Policy as amended will be posted on the App as well as our Website as soon as practicable following that update. Your continued use of the App or Website following such posting will signify your consent to its revised terms