

# **Privacy Policy** Collection of Personal Information at Food Program Intake Last Modified: May 2025

# (1) Introduction

The Ottawa Food Bank ("we", "us", "our") recognizes and respects the privacy of food program visitors across the network of agencies we partner with, and our supporters, volunteers, and staff team. We take steps to ensure that the personal information we collect about you remains confidential, secure, and private, and used only for the purpose for which it was collected as is detailed in this policy.

This policy applies to information we collect, use, or disclose about you when you visit a food program within the Ottawa Food Bank network, if you choose to share your personal information with us.

Please read this policy carefully and to check back periodically to understand our policies and practices for collecting, processing, and storing your information. By accessing food programs in the Ottawa Food Bank network, you indicate that you understand, accept, and consent to the practices described in this policy.

## (2) Information We Collect About You

When you visit a food program, we may collect and use certain types of information from and about you, including:

- **Personal Information:** Information that can reasonably be used to directly or indirectly identify you, such as your name, birthdate, gender, racial identity, disability status, dietary considerations, residential address, primary source of income, residency and immigration information, housing type, educational information, and other identifiers.
- Non-Personal Information: Information that does not directly or indirectly reveal your identity, such as demographic information or statistical or aggregated information.

# (3) Link2Feed System

A staff member or volunteer at the food program you are visiting will enter or update your information in "Link2Feed," a third-party software for storing and accessing the personal information of food program visitors. Link2Feed is used by agencies that are part of the Ottawa Food Bank network. Agencies input personal information into, and have access to, the personal information provided in our shared Link2Feed database for the purposes of delivering their programs and service offerings. Agency staff and volunteers are required to protect personal information and keep it confidential. Link2Feed servers are located in Canada.

Effective June 2025, all take-home grocery programs<sup>1</sup> that work with the Ottawa Food Bank will have access

<sup>&</sup>lt;sup>1</sup> Some take-home grocery programs do not share the personal information they collect with the rest of the Ottawa Food Bank network. Please speak with your local food program to find out if they share personal information outside of their organization.



to the information you have provided since January 2024. If this is your first time visiting a food program, your information will be entered in Link2Feed for the first time. Once your information is entered in Link2Feed, you will not need to register again if you visit another food program within the Ottawa Food Bank network. At most, you may be asked to update your information.

# (4) How We Collect Information About You

When you attend your food program, we may use different methods to collect your information through direct interactions, for example, by filling in forms or corresponding with us by phone or email.

# (5) Consent to Collection, Use and Disclosure

By providing your personal information to staff and volunteers at your food program, you are providing your consent for us and our network of member agencies to collect, use and disclose your personal information in accordance with this Privacy Policy and applicable laws. No compensation is offered for sharing your information. You may withdraw your consent at any time, subject to applicable laws.

You may also withhold your consent to providing personal information and you may consent to provide some but not all of any requested personal information - you do not have to provide us a reason for withholding consent. Note that if consent is withheld, it will <u>not affect</u> whether you are able to receive food. It will not affect your relationship with the staff and volunteers of the food program you visit, or the Ottawa Food Bank. Some services, however, will need certain information for you to access their service; for example, an address is needed for home delivery. You can provide your information and remain anonymous in the Link2Feed system.

# (6) Use of Information

To the extent applicable and permitted by law, we may use your personal information in the following ways:

- (a) To provide you with information, programming, or services that you accept from us.
- (b) To fulfill the purposes for which you provided the information or that were described when it was collected, or any other purpose for which you provide it.
- To record your food program visits to help us understand your situation and food needs. To this end, we aggregate and anonymize certain personal information so that you cannot be personally identified and use summaries and reports to improve our services offerings, including as follows:
  - Measuring change in community food insecurity and food program use;
  - Deciding which food and how much food to purchase and distribute;
  - Deciding which programs are most helpful and which need to be improved;
  - Reporting back to funders that support our operations;
  - Deciding what supports should be offered to food programs;
  - Attracting donors;
  - Research and statistical reporting;
  - Making internal strategic decisions;
  - Advocating for government policy changes; and
  - Promotion and marketing efforts on our website and social media to share the progress of our efforts.
- (c) In any other way we may describe when you provide the information or that you consent to.



Please note that the Ottawa Food Bank is a not-for-profit organization and a registered charity, and we will not sell any of your personal information to anyone.

# (7) <u>Disclosure of Personal Information</u>

We may share your personal information internally within our organization or with our network of member agencies and their respective staff and volunteers. Other than these disclosures, we will only disclose your personal information to third parties:

- (a) To fulfill the purpose for which you provide it, where you have given your express or implied consent to disclose the personal information for that purpose.
- (b) For purposes required by law, including by an order of any court, institution or body with jurisdiction or authority to compel the production of information, or in order to protect or defend a legal interest.
- (c) To contractors, service providers, and other third parties we use to support or that work with our organization and who are obligated to keep personal information confidential and only use such information for the purposes for which we disclose it to them.
- (d) For any other purpose disclosed by us when you provide the information.
- (e) With your consent.

## (8) Food Banks Canada

Our requests for information are generally set by the national food bank association: Food Banks Canada. If you have questions or concerns about the information being requested, you may contact the Food Banks Canada Customer Experience Hotline at 1-877-280-0329 or <u>complaints@foodbankscanada.ca</u>.

### (9) <u>Security</u>

The security of your personal information is very important to us. We use physical, electronic, and administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the web.

### (10) Breaches of Security Safeguards

If there are breaches of our security safeguards involving your personal information that pose a real risk of significant harm to you, we are committed to notifying the Office of the Privacy Commissioner of Canada (OPC) and individuals affected in accordance with requirements under applicable law.

# (11) Data Retention



Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Following seven years of inactivity, personal data in Link2Feed is automatically anonymized. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data as well as non-personal information without further notice to you or your consent.

# (12) Children and Minors

Children under 13 are not directly asked for their personal information. Information about children under 13 is collected if they are the household members of primary clients at food programs. All data of minors is anonymized after one year of inactivity after their 18th birthday. If we learn we have collected or received personal information from a child under 13 without verification of parental or guardian consent, we will delete that information. If you believe we might have any information from or about a child under 13 that has not been verified by a parent or guardian, please contact us at the address indicated below.

# (13) Accessing and Changing Account/Registration Information

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes. By law you have the right to request access to and to correct the personal information that we hold about you.

If you want to review, verify or correct your personal information, or if you wish to withdraw your consent, you may contact us at <u>feedback@ottawafoodbank.ca</u>. At any time, you may contact us and request access to your personal information, or request that we correct or delete your personal information. Anonymized data may not be accessible. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

# (14) Changes to this Privacy Policy

We will post any changes we make to our website at <u>ottawafoodbank.ca/privacy</u>. We include the date the privacy policy was last revised at the top of the document.

### For more information, please contact us.

We welcome your questions, comments, and requests regarding this privacy policy and our privacy practices. Please contact us at:

feedback@ottawafoodbank.ca 613-745-7001 Ottawa Food Bank 2001 Bantree Street, Ottawa, ON K1B 4X3