

# COMMUNITY SUPPORT FOR STUDENTS PROGRAM (CSSP) PRIVACY POLICY

(Last updated: November 25, 2020)

Community Support for Students Program (CSSP) 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 website at [compassaward.com](http://compassaward.com) (the “**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 Community Support for Students Program or its service providers and agents (collectively referred to as CSSP, “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.

- [1. WHO WE ARE](#)
- [2. WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?](#)
- [3. HOW IS YOUR PERSONAL INFORMATION COLLECTED?](#)
- [4. WHY DO WE COLLECT AND USE YOUR PERSONAL INFORMATION](#)
- [5. TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION](#)
- [6. INTERNATIONAL TRANSFERS](#)
- [7. HOW DO WE PROTECT THE CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION](#)
- [8. HOW LONG WILL WE RETAIN YOUR PERSONAL INFORMATION?](#)
- [9. YOUR LEGAL RIGHTS](#)
- [10. CONTACTING US](#)

## 1. WHO WE ARE AND WHAT WE DO

CSSP is a registered Canadian charity. We provide financial assistance to hard-working high school students who are experiencing financial difficulties.

CSSP collects and processes personal information through the following areas of operations:

- Our **website for donors** offers a tools and services for individuals to donate money to enable the program. CSSP collects and processes the donor’s personal information submitted through the Website and donor form. At the donor’s express request, CSSP may also disclose personal information about the donor’s contribution (name, amount, contribution level).

All donations made through our tools are made directly to CSSP (who issues donors their tax receipts). CSSP receives transfers of donated amounts (minus non-commercial service fees) from the registered charity providing online services at [CanadaHelps.org](http://CanadaHelps.org).

## 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, company you work for, and in the case of individuals representing charities using our tools and service, your job title, role and/or level of experience.
- **Contact Personal information** includes address, email address and telephone numbers.
- **Financial Personal information** includes bank account, credit card details and securities related information in the event you donate securities or mutual funds to CanadaHelps.org (including your mutual fund or security name, number of units, investment firm, account number, financial advisor name, email, phone number.)
- **Transaction Personal information** includes details about payments to you (refunds) and from you (donations) and purchase of products through CanadaHelps.org (including a Charity gift card).
- **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 website.
- **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 website and our Services.
- **Marketing and Communications Personal information** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

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 website 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 CSSP 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.

This website is not intended for children under the age of 18 and we do not knowingly collect personal information relating to children.

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

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

- a. **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:
  - i. Sign-up for an account and update your account;
  - ii. Make a donation (including one-time gifts, recurring gifts, gifts of securities, and donations made to purchase a charity gift card) and receive a tax receipt, if applicable;
  - iii. Subscribe to our educational services or publications or to contact us or provide feedback;
  - iv. Request marketing to be sent to you; or
  - v. Give us feedback or contact us.
- b. **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Personal information about your equipment, browsing actions and patterns. We collect this personal information by using cookies, pixels, server logs and other similar technologies. We may also receive Technical Personal information about you if you visit other websites employing our cookies.
- c. **Third parties or publicly available sources.** We will receive personal information about you from various third parties as set out below:
  - i. Technical Personal information from:
    - A. analytics providers such as Google Analytics;
    - B. digital marketing service platforms such as MailChimp, Sprout Social and Hootsuite;

- C. advertising networks such as Google Adwords, DoubleClick, Facebook and Twitter. We use unique tracking codes in our emails and pixels on our website to allow us to share your technical information with such providers to track use of our site (including the performance of our ads) and to retarget ads.
- ii. Contact, Financial and Transaction Personal information from providers of technical, payment processing and delivery services. Securities or mutual fund donations are processed by our broker.

## 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 to process your Personal information where more than one ground has been set out in the table below.

We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

**Table: Purposes for which we will use your personal information**

Purpose/Activity	Type of personal information	Lawful basis for processing including basis of legitimate interest	Who do we share your personal information with for these purposes
To process your requests and perform our services	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	Performance of a contract with you (e.g. facilitating your donation according to your directive).	We may share your personal information with certain of our service providers who process your information on our behalf, on a need to know basis, in order to be able to process your requests or otherwise perform our services.
To make a donation, including one-time and monthly monetary donations, and donations of securities and mutual funds and receive a charitable tax receipt, if applicable.	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (e.g. facilitating your donation according to your directive). (b) Necessary for our legitimate interests (to recover sums due to us).	(a) We share your Financial personal information only with our third party payment processor or broker, depending upon the type of donation. (b) We receive this information, except Financial personal information, from CanadaHelps.org unless you were provided the option to remain anonymous and you selected that option when making the donation.

			<p>(c) If you make a donation through a page created by us to fundraise on CanadaHelps.org, we receive your name and email to thank you for your contribution; we only receive your name, donation amount and/or message only if you provide us explicit consent to do so.</p> <p>(d) If your donation is a Charity Gift Card or if you chose to send an eCard to announce a donation made in memory or honour of someone, CanadaHelps.org share your name and email with the recipient so they can thank you for the gift. (see their privacy policy)</p>
To sign-up for an account and update your account.	(a) Identity (b) Contact	(a) Performance of a contract with you.	(a) We do not share your personal information for this purpose unless you provide your Financial personal information, in which case we only share this information with our third party payment processor.
To enable automatic or fast donation processing for future one-time and/or or recurring donations done via CanadaHelps.org on our behalf and their privacy policy applies.	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to recover sums due to us).	We receive this information, except Financial personal information from CanadaHelps.org.
To subscribe to our educational services or publications; to contact us or provide us feedback; to participate in a survey.	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (for marketing purposes).	(a) We do not share your personal information for this purpose.
To improve the performance of our marketing programs, and to deliver relevant content and advertisements to serve you better and grow charitable giving in Canada.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Where your personal information is completely anonymised, we do not require a legal basis to use it as the information will no longer constitute personal information that is regulated under privacy protection laws. (b) Necessary for our legitimate interests (to ensure that we provide the very best Services to you and our Clients) where your personal information is not in an	We share your personal information with a variety of third party analytics and digital marketing service providers to assist us with these activities such as Google Analytics, SproutSocial, Google Adwords, MailChimp, and Facebook.

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity (b) Contact  (c) Technical	anonymous form.  (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). (b) Necessary to comply with a legal obligation.	(a) We do not share your personal information for this purpose.
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**a. Marketing**

We strive to provide you with choices regarding certain personal information uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Personal information to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which Services may be relevant for you.

Where *Canada's Antispam Legislation (CASL)* applies to CanadaHelps' communications with users, donors or volunteers, CSSP is committed to complying with CASL and, in particular, the provisions setting out the requirements for sending commercial electronic messages.

You will receive marketing communications from us if you have requested information from us or made a donation to us and you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal information with any third party for marketing purposes.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time. If you are receiving marketing messages from another charity to which you made a donation through our Website and you no longer wish to receive such messages, then you should contact that charity to make this request.

Where you opt out of receiving these marketing messages, we may continue to use your personal information in order to provide you with the services you have requested from us.

Where our use of your personal information requires your consent, you can provide such consent:

- at the time we collect your personal information following the instructions provided; or
- by informing us by e-mail, post or phone using the contact details set out in this Privacy Policy; or
- by registration through our website

**b. Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

**c. Change of Purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 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 in the table *Purposes for which we will use your personal information* in this Privacy Policy.

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. INTERNATIONAL TRANSFERS

By providing us with Personal information, you acknowledge and agree that your Personal information may be processed in other countries, including the United States, where laws regarding processing of Personal information may be less stringent than the laws in your country. Where necessary to make such transfers, we will comply with our legal and regulatory obligations in relation to the Personal information. This will include putting appropriate contractual safeguards in place to ensure an adequate level of protection for the Personal information. Please contact us if you want further information on the specific mechanism used by us when transferring your Personal information out of Canada.

## 7. 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.

All of our members, volunteers, 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 Site 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.

## 8. 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.

## 9. YOUR LEGAL RIGHTS

The vast majority of our donors and website users are Canadians and so our privacy policy has been drafted to help ensure compliance with applicable Canadian law. However, we have noted that (although we do not target our services to EU data subjects) some of our individual donors may be from outside of Canada, including from the European Economic Area (“**EEA**”). For the benefit of such users, we also endeavor to provide adequate protection for the personal data of EU data subjects in accordance with applicable EU data protection laws and regulations, including the EU GDPR. Subject to certain exemptions, you have the following rights in relation to the Personal information we hold about you:

a. Your right of access

If you ask us, we'll 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.

b. 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.

c. 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.

d. 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.

e. 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.

f. 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.

g. 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.

h. 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.

- i. Your right to lodge a complaint with the supervisory authority

If you have a concern about any aspect of Community Support for Students Program's privacy practices, including the way we've handled your Personal information, you can report it to the relevant supervisory authority.

## 10. CONTACTING US

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

Community Support for Students Program (CSSP)  
184 Humbervale Blvd  
Toronto, Ontario 8Y 3P8  
info@compassaward.com  
Telephone number: 1-416-236-3417

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 website, we encourage you to read the Privacy Policy of every website you visit.

### Changes

CSSP 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 our Website as soon as practicable following that update. Your continued use of the Website following such posting will signify your consent to its revised terms.