

Action Chelsea for the Respect of the Environment (ACRE)

## Personal Data Governance Policy

Approved by the Board of Directors on January 9, 2025



### 1. Introduction

This Personal Data Governance Policy (hereinafter "the Policy") sets out the principles and practices that guide the collection, use and management of Personal Data by ACRE. It includes technical and behavioral standards and guidelines for the quality, integrity, security, confidentiality, compliance, retention and archiving of Personal Data. It applies to ACRE directors, staff and volunteers, as well as to any person providing services on its behalf. The Policy does not apply to services offered by other organizations, even if they are accessible through links on the ACRE Web site or social networks, such as Mailchimp for the distribution list, Zeffy for secure monetary transactions, or the Facebook page.

### Definitions

**Data** means facts, statistics and information collected for reference or analysis by ACRE. This includes membership and donor information, and all personal information associated with these records.

**Privacy Officer** means the person assigned by the President of ACRE to monitor, oversee and report to the Board on Personal Data Governance issues and concerns with non-compliance and complaints.

**Personal Data** means information that relates to a person and enables that person to be identified. It includes derived data, in any location and in any format (paper, digital or audiovisual), whether the personal Data appears in saved files, work documents, electronic documents, e-mails, online transactions, data stored in databases, on tape, on disk, maps, plans, photographs, sound or video recordings.

**Personal Data Governance** means ACRE's set of policies, standards, procedures and roles for managing Personal Data in a responsible and ethical manner.

### References

- [Le site internet de la commission d'accès à l'information](#)
- [La Loi fédérale sur la protection des renseignements personnels et les documents électroniques \(LPRPDE\)](#)

### 2. ACRE's Protection of Personal Data

When engaging in activities that involve the management of Personal Data, ACRE adheres to the following:

## **2.1. Use of Personal Data:**

ACRE only uses Personal Data in a manner consistent with ACRE's mandate and for the purposes for which the data was collected. ACRE may be required to disclose personal data in certain situations, such as when required by law or in response to a valid request from a public authority.

Before using the data for any other purpose, ACRE will first obtain the consent of the person concerned. The consent can be withdrawn any time by contacting the Privacy Officer.

ACRE permits Board directors, employees, volunteers and contractors to access and use Personal Data only to the extent required for the performance of their duties related to the activities and mandate of ACRE.

Any disclosure of Personal Data requires the approval of ACRE's Privacy Officer. ACRE may be required to disclose personal data in certain situations, such as when required by law or in response to a valid request from a public authority (e.g., a court or government agency). When it is reasonably possible and legally permissible to do so, we will inform affected persons of such disclosure.

## **2.2. Data Security**

Documents containing personal data are only stored in ACRE's OneDrive, online cloud storage within Microsoft 365, in folders with limited access and password protected. These documents are accessible by authorized users only as set out in this Policy. If these documents are uploaded, they are kept on password-protected devices.

Before collecting or accessing Personal Data, employees, volunteers outside of the Board and contractors are required to sign a non-disclosure agreement and obtain the approval of the Privacy Officer.

Other than for temporary use, ACRE does not store Personal Data on paper or any other non-electronic format, except for legal copies of deeds to land.

## **2.3. Retention of Personal Data**

ACRE retains Personal Data only for as long as necessary to achieve the purposes for which it was collected and to comply with ACRE's legal obligations.

## **2.4. Destruction of Personal Data**

Board members or other individuals authorized to access Personal Data destroy paper documents containing Personal Data when the documents are no longer required. They shall also ensure that all Personal Data is completely deleted from devices (computers, phones, tablets, external hard drives) and cloud computing tools when it is no longer required.

### **3. Roles and Responsibilities**

#### **3.1. The Board of Directors**

The Board of Directors oversees Personal Data Governance and ensures that Personal Data is collected and used responsibly, ethically and securely as set out in this Policy.

The Board of Directors:

- 3.1.1. is aware of the types of Personal Data being collected by ACRE;
- 3.1.2. appoints the Privacy Officer;
- 3.1.3. ensures that this Policy is up-to-date with government requirements and is being followed by any ACRE member accessing personal data;
- 3.1.4. allocates the resources necessary for the implementation of this Policy;
- 3.1.5. on a yearly basis, monitors and assesses the risks associated the collection, storage and use of Personal Data;
- 3.1.6. clearly communicates to employees, members, stakeholders, volunteers, and other concerned people its policy and protocols concerning Personal Data;
- 3.1.7. is transparent in its collection, use and destruction of Personal Data; and
- 3.1.8. complies with data protection laws and regulations.

#### **3.2. Privacy Officer**

The Privacy Officer is responsible for overseeing and ensuring that ACRE complies with applicable laws and regulations relating to the protection of Personal Data.

The Privacy Officer:

- 3.2.1. oversees and reports to the Board of Directors on ACRE's regulatory compliance with Personal Data protection laws and regulations annually at the board meeting following the audit;
- 3.2.2. develops for the approval of the Board of Directors policies and protocols related to confidentiality, incident management, the receipt/processing of complaints, and requests from persons wishing to exercise their rights related to their Personal Data;
- 3.2.3. conducts a privacy impact assessment and monitors the risks associated with the collection, use, storage and destruction of Personal Data and recommends to the Board of Directors mitigation measures;

- 3.2.4. ensures that appropriate security measures are in place to protect data against unauthorized access, loss or alteration;
- 3.2.5. raises awareness in the organization of the importance of protecting Personal Data and ensures that the Board of Directors, employees, volunteers and contractors understand their role in protecting Personal Data; and
- 3.2.6. manages and advises the Board of Directors on requests from persons exercising their rights, such as the right to access, rectify or delete their Personal Data, and complaints related to the protection of Personal Data.

### **3.3. Personal Data Collectors**

ACRE members who collect Personal Data:

- 3.3.1. only collect Personal Data that is relevant to ACRE's mandate as a land trust and conservation organization;
- 3.3.2. protect Personal Data from unauthorized access, disclosure or loss by complying with section 2.2 of this Policy;
- 3.3.3. ensure that the confidentiality of Personal Data is respected;
- 3.3.4. do not improperly disclose Personal Data;
- 3.3.5. report any Personal Data related issues, including data breaches or security concerns, to the organization's Privacy Officer; and
- 3.3.6. comply with this Policy and all ACRE's protocols related to Personal Data.

### **3.4. Personal Data Users**

ACRE members using Personal Data:

- 3.4.1. only access Personal Data collected by ACRE on a "need to know" basis related to the activities or business of ACRE as set out in section 2.1 of this Policy;
- 3.4.2. protect Personal Data from unauthorized access, disclosure or loss by complying with section 2.2 of this Policy;
- 3.4.3. ensure that the confidentiality of Personal Data is respected;
- 3.4.4. do not improperly disclose Personal Data; and report any Personal Data related issues, including data breaches or security concerns, to the organization's Privacy Officer; and comply with this Policy and all ACRE's protocols related to Personal Data.

## **4. Complaints and Incidents**

ACRE publishes on its website a dedicated email address where complaints or incidents can be submitted to ACRE, and the Privacy Officer records in an incident log all incidents identified through monitoring, reports, system alerts, or communications potential breaches or unauthorized access to Personal Data.

Upon becoming aware of a complaint or incident, the Privacy Officer will:

- 4.1.** conduct an initial assessment to determine the validity and urgency of the matter. This may involve gathering relevant documents, interviewing involved parties, and assessing the organization's practices and policies; and
- 4.2.** advise the Board of Directors of the complaint or incident and make a recommendation Board on how to resolve the matter in a timely manner; and notify any affected individuals, regulatory authorities, and any other affected persons as required by the applicable laws.

The Board of Directors will assess whether corrective measures are necessary to address the complaint and prevent similar incidents from occurring in the future.

## **5. Requests from Subjects Wishing to Exercise their Rights**

ACRE's protocol to handle requests from individuals wishing to exercise their rights (e.g., right to access and correction) is as follows:

- 5.1.** ACRE publishes on its website a dedicated email address where requests can be submitted to ACRE; and
- 5.2.** the Privacy Officer responds to the request in a timely manner and makes requested changes in compliance with data protection laws and regulations.

## **6.0. Application**

It is the responsibility of all Board Directors, employees, volunteers, contractors, and anyone who may have access to Personal Data held by ACRE to be familiar with this Policy and to adhere to it.

Verification of compliance with this policy is the responsibility of the organization's Privacy Officer and the Board of Directors. This policy and all related protocols will be subject to review and update by the Board of Directors.

## **7.0. Policy Review**

The Personal Data Governance Policy will be reviewed every two years and whenever there is a material change in circumstances.

