



Privacy Policy

Canada-Mathare Education Trust's (CMETrust's) mission is to advance education in Kenya by providing secondary and post-secondary school scholarships, with funds raised annually, to students from Mathare Valley Slum, Nairobi, and to raise awareness in Canada about education and urban poverty in Kenya. As furthering this mission involves the collection, use, and disclosure of some personal information about our scholars, donors, and volunteers, protecting their personal information is one of our highest priorities.

We will inform our scholars, donors, and volunteers of why and how we collect, use, and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances and that is consistent with this Privacy Policy.

This Privacy Policy outlines the principles and practices we will follow in protecting scholars', donors', and volunteers' personal information. Our commitment includes ensuring the accuracy, confidentiality, and security of our scholars', donors', and volunteers' personal information and allowing our scholars, donors, and volunteers to request access to, and correction of, their personal information.

Definitions

"Personal information" means information about an identifiable individual that is recorded in any form including, without restricting the generality of the foregoing,

- Any identifying picture, video, number, symbol or other particular assigned to or depicting the scholar, donor, or volunteer;
- Information relating to financial transactions in which the scholar, donor, or volunteer has been involved;
- The address or contact information of the scholar, donor, or volunteer;
- Correspondence sent to us by the scholar, donor, or volunteer, that is implicitly or explicitly of a private or confidential nature, and replies to such correspondence that would reveal the contents of the original correspondence;

- The name of the scholar, donor, or volunteer, where it appears with other personal information relating to the scholar, donor, or volunteer, or where the disclosure of the name itself would reveal information about the scholar, donor, or volunteer.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting personal information are obvious and the scholar, donor, or volunteer voluntarily provides his or her personal information for those purposes, we will communicate the purposes for which personal information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 We will only collect scholar, donor, or volunteer information that is necessary to fulfill the following purposes:
 - To verify identity;
 - To identify scholar, donor, or volunteer preferences;
 - To understand the needs of our scholars, donors, and volunteers;
 - To enrol a scholar in a program;
 - To contact our donors or volunteers about fundraising, campaigns, events, and other CMETrust activities;
 - To ensure a high standard of service to our scholars, donors, or volunteers;
 - To meet legal requirements.

Policy 2 – Consent

- 2.1 We will obtain scholar, donor, or volunteer consent to collect, use, or disclose personal information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided orally, in writing, or electronically, or it can be implied where the purpose for collecting, using or disclosing the personal information would be considered obvious and the scholar, donor, or volunteer voluntarily provides personal information for that purpose.
- 2.3 Consent may also be implied where a scholar, donor, or volunteer is given notice and a reasonable opportunity to opt-out of his or her personal information being used for newsletters, the marketing of new campaigns or events, or fundraising and the scholar, donor, or volunteer does not opt-out.
- 2.4 Subject to certain exceptions (e.g., the personal information is necessary to provide a service, or the withdrawal of consent would frustrate the performance of a legal obligation), scholars, donors, and volunteers can withhold or withdraw their consent for

CMETrust to use their personal information in certain ways. A scholar, donor, or volunteer's decision to withhold or withdraw their consent to certain uses of personal information may restrict our ability to provide a particular service. If so, we will explain the situation to assist the scholar, donor, or volunteer in making the decision.

2.5 We may collect, use or disclose personal information without the scholar, donor, or volunteer's knowledge or consent in the following limited circumstances:

- When the collection, use or disclosure of personal information is permitted or required 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 telephone directory);
- When we require legal advice from a lawyer;
- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law.

Policy 3 – Using and Disclosing Personal Information

3.1 We will only use or disclose scholar, donor, or volunteer personal information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as:

- To conduct scholar, donor, or volunteer surveys in order to enhance our programs, campaigns, and events;
- To contact our scholars, donors, or volunteers directly about programs, campaigns, and events that may be of interest.

3.2 We will not use or disclose scholar, donor, or volunteer personal information for any additional purpose unless we obtain consent to do so.

3.3 We will not sell scholar, donor, or volunteer lists or personal information to other parties.

Policy 4 – Retaining Personal Information

4.1 If we use scholar, donor, or volunteer personal information to make a decision that directly affects the scholar, donor, or volunteer we will retain that personal information for at least one year so that the scholar, donor, or volunteer has a reasonable opportunity to request access to it.

- 4.2 Subject to policy 4.1, we will retain scholar, donor, and volunteer personal information only as long as necessary to fulfill the identified purposes or a legal purpose.

Policy 5 – Ensuring Accuracy of Personal Information

- 5.1 We will make reasonable efforts to ensure that scholar, donor, and volunteer personal information is accurate and complete.
- 5.2 Scholars, donors, and volunteers 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.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of scholar, donor, and volunteer personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 We will use appropriate security measures when destroying scholar, donor, and volunteers' personal information.
- 6.4 We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

Policy 7 – Providing Scholars, Donors, and Volunteers Access to Personal Information

- 7.1 Scholars, donors, and volunteers have a right to access their personal information, subject to limited exceptions.
- 7.2 A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. Scholars, donors, and volunteers may send an email to info@cmetrust.org to request access to their personal information.
- 7.3 Upon request, we will also tell scholars, donors, and volunteers how we use their personal information and to whom it has been disclosed if applicable.
- 7.4 We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
- 7.6 If a request is refused in full or in part, we will notify the scholar, donor, or volunteer in writing, providing the reasons for refusal and the recourse available to the scholar, donor, or volunteer.