



PRIVACY POLICY	Approuvée par le CA le : 27 septembre 2023
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The Foundation of Greater Montreal (“**FGM**” or “**we**”) is a community foundation, a charitable organization dedicated to the development and well-being of its community. In collaboration with its partners, it mobilizes philanthropic resources, disseminates knowledge, catalyzes initiatives and supports the community in advancing the Sustainable Development Goals (SDGs) in Greater Montreal (FGM’s “**mission**”).

The purpose of this privacy policy (the “**Policy**”) is to explain how FGM processes and protects the personal information of individuals (or “**you**”) who interact with FGM. This includes fund creators, donors, partners, individuals who visit or use the websites operated by FGM (including the [Montreal Climate Partnership](#), [Make an online donation](#) and [Accès Fonds](#)) as well as other digital platforms used by FGM (**collectively, “Digital Platforms”**). By “**personal information,**” we refer to any information that relates to an individual and allows them to be identified.

FGM values its relationship with you and is committed to taking all appropriate measures to ensure the security and confidentiality of your personal information.

The processing of your personal information is based on your consent under applicable laws. At any time, and subject to these, you may contact us to withdraw your consent for FGM to use your personal information. However, consequently, FGM may no longer be able to offer you all available services.

1. COLLECTION

a. From you directly

We gather personal information about you when you communicate with us (by email, phone, postal mail, videoconference, in person or via social media), make a donation, sign up for a mailing list, register for an activity, fill out a questionnaire created by FGM, or apply for employment or to be a volunteer. As well, in the carrying out of our mission, and in order to comply with the legal obligations to which we are subject, including those under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*, we are required to collect certain information about individuals, particularly for identification purposes. Wherever possible, we will indicate which fields on a form are mandatory and which are optional. The information gathered may include, but is not limited to:

- first and last name;
- pronouns;
- date of birth;
- language of correspondence;
- home address;
- telephone number;
- email address;
- occupation;
- work history;



- philanthropic interests;
- valid photo identification;
- banking information and amount of money donated to FGM;
- information automatically collected when you use our Digital Platforms.

Updating your information is your responsibility.

In general, personal information about you will be collected directly from you. We may, however, gather personal information from third parties, insofar as law permits it.

We may also collect personal information in order to comply with applicable legal or regulatory requirements or for other purposes permitted by law. We do not gather personal information for other purposes unless we have obtained the consent of the individual concerned.

a. Cookies and IP addresses

Individuals using our Digital Platforms should also be aware that anonymous technical data may be collected during their visits to these platforms. Such data may include the individual's IP address, their type of internet browser and operating system, their domain name, the times at which they access the platforms and referring website addresses. We use this data to identify individuals, gather general demographic information on website users, troubleshoot problems affecting our systems and manage our Digital Platforms. If the user's browser settings allow it, our Digital Platforms may also utilize cookies to help us provide content that is tailored to the user's preferences, or to save their password so that they do not have to re-enter it every time.

We will not attempt to connect or correlate these anonymous technical data to identifiable personal information, unless we (or our service providers) have obtained your consent, or in accordance with applicable laws.

Note as well that we use analytics service providers like Google Analytics. Please refer to these service providers' websites to obtain more information on their privacy practices (for example, you will find more information on Google's practices in the gathering, use and processing of data here: <https://policies.google.com/technologies/partner-sites?hl=en>).

Many web browsers allow you to manage your preferences. You can set your browser so that it rejects cookies or deletes particular ones. You may be able to manage other tracking technologies in this way as well. In some cases the tracking tools used by third service providers can be disabled. For example, Google allows you to disable cookies that are utilized to target ads, by going to the [advertising opt-out](#) page on its main site. Google Analytics can also be deactivated, by downloading a web browser plugin that is available for this purpose. You can, as well, refuse to allow the use of cookies by going to the [Network Advertising Initiative's](#) opt-out page.



2. USAGE

We collect and use personal information primarily for operational, customer relations, and legal purposes, such as to:

- contact you or a person designated by you;
- set up one or more databases with your contact information;
- identify members of the public who engage with us;
- conduct due diligence should you wish you open a fund at FGM (background check, online search, Quebec registry of businesses, Industry Canada, etc.);
- set up a user account on a Digital Platform, if applicable;
- manage your transactions with our partners and service providers;
- publish our annual reports;
- assess your application in the context of a recruiting process;
- promote FGM, your fund, or you as a fund creator, donor, or partner;
- improve our services;
- compile statistics.

3. COMMUNICATIONS

Our staff, management, and volunteers may access your personal information in order to carry out their work, mandate, or mission. Some of our service providers may also have access to your personal information. These third parties are required to comply with applicable laws to ensure the security of your personal information. As part of our activities, we may transmit your information to service providers for the hosting of data and in connection with IT, marketing, communications, customer relations management, accounting and legal services.

Subject to this policy and applicable laws, we will not otherwise disclose your personal information without your consent. Depending on the purpose of the personal information you provide to us, we may obtain your consent in several ways, including, but not limited to, a communication addressed to us or a signed form from you. We do not sell or distribute your personal information.

At all times, we will deploy our best efforts to communicate only what is necessary, relevant, and reasonable.

4. SECURITY

Our internal practices help protect your privacy by limiting the use of your data by our staff or our volunteers.

We have implemented reasonable security measures to protect against the theft, loss, misuse or modification of your personal information, for instance firewalls, encryption technologies, and the limiting of access to personal information to only those individuals who truly need to have it.

Nonetheless, it must be noted that any piece of information transmitted via the Internet is liable to be intercepted by a third party. We can thus not assume responsibility for the theft, loss, improper usage or altering of any personal information transmitted via the Internet. We are prepared to take timely and appropriate measures in the event of any incident involving personal information, in accordance with applicable privacy laws.



Our Digital Platforms may include links to third party websites that can collect personal information. This policy does not address these third parties' privacy policies (or the absence thereof). We cannot assume responsibility for the policies, practices and actions of these third parties.

5. CONSERVATION

We store personal information on our internal servers or with service providers. Your personal information will be kept for as long as is needed, depending on how it is used. If we need to retain your personal information, we retain only what is necessary, while de-personalizing your data, to the extent possible. Otherwise, personal information is destroyed. In certain cases, you may be asked to provide a statement confirming that you have entrusted us with your personal information.

6. TRANSFER OF PERSONAL INFORMATION

Personal information collected about you may be stored and/or processed in a jurisdiction other than the one in which you reside. Our service providers may store and process personal information elsewhere in Canada, or in another country.

When information is stored or processed outside your jurisdiction, it may be subject to laws enacted by the authorities of these other jurisdictions and be accessible to them. We have taken the appropriate technical, organizational and legal measures to keep this information secure. We make sure that our service providers comply with all applicable laws in matters of privacy protection, and have implemented contractual provisions that impose upon them the relevant duties.

7. CHANGES TO THE POLICY

This Policy may be changed without notice to comply with applicable laws or to reflect our practices.

8. YOUR RIGHTS

At any time, subject to applicable laws and to the extent of what is within our control, you may contact us to change, access, verify or update your personal information, or withdraw your consent for FGM to use your personal information. FGM reserves the right to request proof of identity when responding to your request. A nominal fee may apply.

9. CONTACT US

Questions regarding personal information or this Policy should be directed to:

Foundation of Greater Montréal/The Montreal Climate Partnership
Privacy Agent
505 René-Lévesque Boulevard W., suite 1000
Montreal, Quebec
H2Y 1Y7

Email: affaires.juridiques@fgmtl.org
Telephone: (514) 866-0808, extension 110