

	Date: updated Oct 2025
	Next Scheduled Review - 2027
	Title : <b>Privacy Policy</b>

**1.0 Purpose**

National Service Dogs (NSD) is committed to protecting the privacy and confidentiality of all personal and personal health information we collect. NSD complies with the Ontario Personal Health Information Protection Act, 2004 (PHIPA) for all client and health-related data, and with the federal Personal Information Protection and Electronic Documents Act (PIPEDA) for information collected in the course of commercial activities such as donations and merchandise sales.

This Privacy Policy explains how NSD collects, uses, discloses, stores, and protects personal information in accordance with these laws.

**2.0 Audience**

This document is applicable to all NSD stakeholders.

**3.0 Related Documents**

Personal Information Consent Form

**4.0 Definitions**

Personal Information	Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form such as a personal e-mail address, credit card numbers, home addresses and so on. It does not include information normally found on a business card, such as name, title, company, business address, business e-mail address, business telephone or fax number.
Personal Health Information (PHI)	PHI includes any identifying information about an individual that relates to their physical or mental health, medical history, disability, health services provided, or eligibility for such services. This may include information about service dogs or assessments related to a person’s disability.  NSD collects and safeguards PHI in accordance with PHIPA.

## 5.0 Procedure

### **Who is responsible for protecting the personal information collected, used and disclosed by the NSD?**

The Executive Director serves as NSD's Chief Privacy Officer and may designate qualified staff to act on their behalf. The Chief Privacy Officer is responsible for ensuring compliance with PHIPA, PIPEDA, and this Privacy Policy.

### **Why does NSD collect, use or disclose personal information?**

NSD is committed to empowering people to reach their full potential through the use of specially trained service dogs. In order to meet these goals, NSD may collect, use and disclose personal information, when applicable, for the following purposes:

- To assess applications for a service or facility dog;
- To assess applications for volunteering;
- To evaluate donor needs and interests;
- To issue newsletters and event notifications;
- To solicit annual donations;
- To add information to our website, newsletters, displays and presentations;
- With additional consent to provide stories to media, research and other public relations work.

NSD does not sell or rent its client, volunteer, staff or donor information to any external parties.

### **How do individuals provide NSD with their consent for the collection, use and disclosure of their personal information?**

Individuals may provide personal information expressly through the application, events/programs registration, or newsletter subscription process. During these processes, they may also provide their preferred contact information. NSD staff and Executive members have access only to the personal information provided by the member that is required to fulfill the purposes stated within this policy. Personal information about potential donors may be collected from individuals when they attend NSD related events. At times, NSD may communicate information and details about future activities to these individuals.

NSD will obtain knowledgeable consent before collecting, using, or disclosing any personal or personal health information.

Consent may be implied when information is provided voluntarily for a clear purpose (e.g., submitting an application), or expressed when required by law (e.g., sharing stories with media, or disclosing health details).

NSD will collect specific permissions on release forms for general use items such as graduation photos, separate projects such as information for brochures and research projects.

Information will not be released to any third party without the express permission of the NSD stakeholder.

Individuals may withdraw consent at any time, subject to legal or contractual limitations, by contacting NSD's Chief Privacy Officer.

### **How much personal information does NSD collect, use or disclose?**

NSD collects, uses and discloses personal information only to the extent required to fulfill the purposes stated within this policy.

### **How long does NSD retain personal information?**

NSD retains personal and personal health information only as long as necessary to fulfill the purposes for which it was collected, or as required by law.

Client and volunteer records are securely retained for the duration of service and for up to seven (7) years after closure, after which they are securely destroyed (e.g., shredded, permanently deleted).

Financial records are retained for seven (7) years to meet Canada Revenue Agency requirements.

### **How accurate is the personal information collected, used and disclosed by NSD?**

Personal information that is collected, used and disclosed by NSD is provided by individuals and is updated by NSD when requested by the individual. If an individual's personal information requires amendment, they may contact the NSD office at 1286 Cedar Creek Rd, Cambridge, ON N1R 5S5 or by phone at 519-623-4188 or email [info@nsd.on.ca](mailto:info@nsd.on.ca) to ensure that the correction is made.

### **How secure is the personal information stored at NSD?**

NSD protects all personal information through physical, administrative, and technological safeguards appropriate to the sensitivity of the data. These include:

- Encryption of electronic records and backups
- Secure password-protected databases
- Limited, role-based access to PHI
- Locked physical filing systems
- Confidentiality agreements for all staff, volunteers, and contractors

If a privacy breach occurs that poses a risk of significant harm, NSD will notify affected individuals and the Information and Privacy Commissioner of Ontario as required under PHIPA.

## **How is personal information collected, used or disclosed via NSD's web sites?**

In order to enhance your browsing experience when accessing NSD's websites, a small text file called a "cookie" is sent from our web server to your browser and stored on your computer. Cookies enhance your browsing experience, and also allow us to recognize you when you return to NSD's websites. You may set your browser to notify you when you receive cookies and you may choose to disable or delete cookies if you wish. Cookies are not programs or code, and are only used to optimize browsing.

NSD's websites may use analytics tools (e.g., Google Analytics) to understand visitor engagement. These tools collect anonymized data such as browser type, time spent on pages, and geographic region. No identifiable personal information is collected without consent.

Users can adjust browser settings to reject cookies without affecting access to NSD's website.

NSD's websites may contain links to other websites owned and operated by third parties. While we attempt to ensure that these organizations adhere to similar privacy policies, we are not responsible for the content or privacy practices of such sites. It is highly recommended that you review the privacy policies of other sites prior to providing any personal information on those sites.

## **How can individuals learn more about NSD's Privacy Policy?**

Updated versions of this Privacy Policy will continue to be posted on the Website at [www.nsd.on.ca](http://www.nsd.on.ca) as we make improvements. This Policy is also available in hard-copy at the NSD office, a copy of which can be requested by contacting NSD at: NSD office at 1286 Cedar Creek Rd, Cambridge, ON N1R 5S5 or by phone at 519-623-4188 or email [info@nsd.on.ca](mailto:info@nsd.on.ca) to ensure that the correction is made.

## **How can individuals access their personal information held by NSD?**

Individuals have the right to access or request correction of their personal or personal health information held by NSD. Requests will be responded to within 30 days as required under PHIPA. Where access cannot be provided, NSD will explain the reason and advise of further recourse options.

## **How can individuals relay their concerns about their personal information held by NSD?**

If individuals have a concern related to NSD's Privacy Policy or its application, they may contact NSD's Chief Privacy Officer.

If their concern is not resolved, they may contact:  
Information and Privacy Commissioner of Ontario (IPC)  
2 Bloor Street East, Suite 1400, Toronto, ON M4W 1A8  
Toll-Free: 1-800-387-0073  
[www.ipc.on.ca](http://www.ipc.on.ca)

For matters related to PIPEDA (commercial activities only), individuals may also contact the Office of the Privacy Commissioner of Canada.