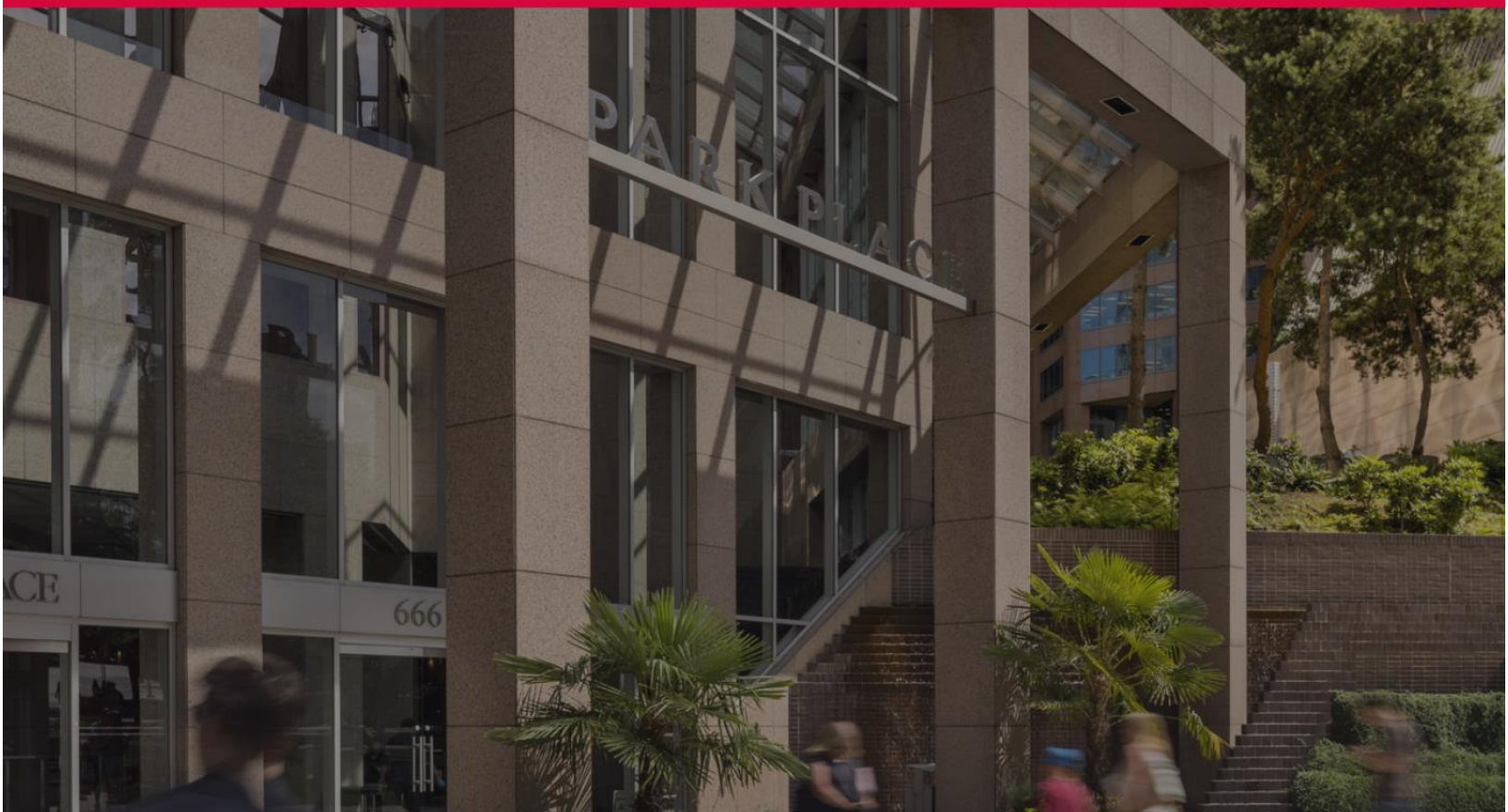




ZLC Foundation Privacy Policy





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INTRODUCTION

ZLC Foundation, a registered charitable Public Foundation (hereinafter “ZLC”), has been engaged to establish a Donor-Advised Fund (“the Fund”) on your behalf. ZLC is also responsible for the ongoing administration of the Fund and your contributions to the Fund will be invested by ZLC (collectively, “the Services”). In the process of doing so, ZLC will have access to your personal information and this Privacy Policy is meant to help you understand how and why ZLC collects, uses, discloses, and protects information about you. The terms “ZLC,” “we,” “us,” and “our” includes ZLC and our affiliates. We use the term “donor”, “you,” and “your” in reference to any person that holds a Fund with ZLC. ZLC is committed to ensuring that your privacy is protected, and you can be assured that your information will only be used in accordance with this Privacy Policy.

To make this Privacy Policy easier to understand, we have provided summaries at the beginning of each section. These summaries are not part of the official policy. Even though we have provided summaries, it is important for you to read the entire policy carefully.

Any modifications to this Privacy Policy will be posted on our website, so please check the “last modified” date of the Privacy Policy periodically. This Privacy Policy was last modified on October 19, 2023.

1. COLLECTION OF INFORMATION

Summary: We collect information about you when you:

- Establish your Fund;
- Make additional donations to your Fund;
- Submit grant recommendations; and
- Communicate with us.

1.1 Information You Provide to Us

We collect information that you provide directly to us. For example, the Gift Agreement that you sign to establish your Fund contains your name, contact information (email address, postal address, phone number), date of birth, and citizenship. This same information is provided for any Successor(s) to your Fund. The Gift Agreement may also contain your bank account and/or brokerage account number, depending on what you are donating to establish the Fund.

2. USE OF INFORMATION

Summary: We use information about you to:

- Administer your Fund, on your behalf;
- Communicate with you; and
- Keep internal records.

2.1 Administering your Fund

We may use information about you for various purposes related to establishing, maintaining, and managing your Fund, including to:

- Set up your Fund;
- Maintain an accurate record of the activity in your Fund;
- Process donations;
- Process grant recommendations; and
- Process estate donations and make adjustments to Fund contact records for your named Successors.

2.2 Operating our Foundation

We may use information about you for various purposes related to our ongoing operations, including to:

- Maintain and improve our operations;
- Develop new services for donors;
- Monitor and analyze trends, usage, and activities in connection with our services;
- Detect, investigate, and prevent fraudulent activity, abuse, and other illegal activities; to protect the rights, property, or safety of ZLC and others; to enforce compliance with our policies; and to comply with applicable laws and government requests;
- Perform accounting and administrative tasks; and
- Create statistics about our operations and understand the current and future needs and preferences of our donors.

2.3 Communicating with You

We may use information about you for various purposes related to communicating with you, including to:

- Respond to your comments, questions, and requests, and providing customer service;
- Provide information and reports regarding the operations of your Fund;
- Send confirmations on your grant recommendations; and
- Provide notifications about your annual Disbursement Quota, if required.

2.4 Legal Basis for Processing

Our legal basis for collecting and using the information described above will depend on the type of information and the specific context in which we collect it.

- We process information about you in order to provide the Services in accordance with our Gift Agreement;
- We verify your identity to protect against fraud;
- We process information about you where it is in our legitimate interest to do so and such interest is not overridden by your rights (for example, fraud prevention, network and information systems security, and improving our operations);
- In some cases, we may have a legal obligation to collect information about you or may otherwise need the information to protect your vital interests or those of another person; and
- We may process information to satisfy a regulatory obligation or to comply with a legal requirement.

3. SHARING OF INFORMATION

Summary: We do not share information about you in any way other than as described in this Privacy Policy. In administering the charitable services of ZLC, we may disclose information about you to:

- Grant recipients, when you have requested to be recognized;
- Our third-party service providers, supplier or agents who assist us in providing the Services;
- Authorities to comply with legal and/or regulatory obligations; and
- An affiliate or successor entity as part of a corporate transaction.

3.1 Data Sharing with Grant Recipients

At your request, we may share your name and contact information with the recipients of grants from your Fund.

All grants made to charities from ZLC are accompanied by a letter indicating the gifts were made from the individual Fund with ZLC. These grants may be disbursed with anonymity or with full disclosure of the donor's name and address in the letter. In your Gift Agreement, you are asked to indicate your disclosure preference which we will adhere to for all grants from your Fund, unless you indicate otherwise for individual grant(s).

3.2 Data Sharing with Our Service Providers

ZLC may use third party service providers, suppliers, or agents to perform certain functions on our behalf, in connection with providing the Services. These functions include foundation administration (including Fund administration), asset management and our technology infrastructure management (including data hosting). We take measures to ensure that these service providers access, process, and store information about you only for the purposes we authorize, subject to stringent confidentiality obligations, and with privacy protection measures comparable to that of ZLC.

3.3 Following the Law

We may disclose information about you to third parties if we believe disclosure is in accordance with or required by applicable law, regulation, legal process, or audits.

3.4 Affiliate Sharing and Merger or Sale

If ZLC is involved in a merger or acquisition, information about you may be shared, sold, or transferred as part of that transaction.

4. ADDITIONAL DETAILS

Summary:

- ZLC Foundation is based in Canada and governed by Canadian law. We process, transfer, and store information on servers located in North America;
- We use all reasonable efforts to protect your personal information and have implemented technical and organizational measures in line with industry best practices. We cannot guarantee these controls will provide absolute security; and
- This Privacy Policy is periodically updated.

4.1 Transfer of Information

ZLC data is securely stored and processed on servers located in Canada and the United States. By opening a Fund with us you acknowledge and consent to the transfer of information to the United States where it would be subject to different data protection laws.

For example, information may be shared in response to valid demands or requests from government authorities, courts and law enforcement officials in the United States.

4.2 Security & Safeguarding Data

ZLC takes all reasonable precautions to protect the personal information that we collect from you. We employ technical and organizational measures designed to appropriately protect your information that is under our control and that we process on your behalf from authorized access, collection, use, disclosure, copying, modification, or disposal, both during transmission and once we receive it.

We store all information that you provide to us on secure servers. We use firewalls designed to protect against intruders and test for network vulnerabilities. However, it should be noted that no method of transmission over the internet or method of electronic storage is completely secure.

We train employees regarding our data privacy policies and procedures and permit authorized employees to access information on a need-to-know basis, as required for their role. Every staff member must sign a Confidentiality Agreement wherein they agree not to improperly use and/or disclose any personal information about our donors.

4.3 Data Retention

We keep your information for as long as we reasonably need it for customer service, tax, legal or reasonable business purposes. For these reasons, we keep your information beyond the end of your relationship with us. When your information is no longer required, we securely destroy it or delete any personally identifiable information.

4.5 Revisions to This Policy

We may modify this Privacy Policy from time to time. If we make any material change to this policy, we will provide additional notice to you, such as by sending you an email.

5. DATA PROTECTION RIGHTS

Summary: Generally speaking, individuals have a right to access the personal information that an organization holds about them. They also have the right to challenge the accuracy and completeness of the information, and have that information amended as appropriate. ZLC adheres to these requirements of the Personal Information Protection and Electronic Documents Act.

5.1 Exercising your Data Protection Rights

ZLC responds to all requests that we receive from individuals who wish to exercise their data protection rights in accordance with applicable data protection laws. Please refer to the Contact Us section below for our contact details if you wish to submit a request or inquiry related to your personal data.

Your data protection rights include:

- Accessing the personal information that ZLC holds about you;
- Challenging the accuracy and completeness of your personal information and/or Fund transaction data, and having that information amended by ZLC as appropriate; and
- Filing a formal complaint with the Office of the Privacy Commissioner of Canada about ZLC's collection and use of your information if you have raised a concern with us and it is not resolved to your satisfaction.

6. CONTACT US

Summary: Under data protection law, the controller of your information is ZLC. We do not have a dedicated Data Privacy Officer, but these duties are part of the responsibilities of Michelle Richier, Director of ZLC and President of ZLC Financial Ltd, our administrative services provider.

If you have questions about our policies or your personal information, please contact Michelle Richier directly:

Michelle Richier
Director, ZLC Foundation
President, ZLC Financial Ltd.
michellerichier@zlc.net

