

Momentum Privacy Policy

Last modified: September 28, 2020

Momentum Community Economic Development Society (“**Momentum**” or “**We**”) respects your privacy and is committed to protecting it through our compliance with this privacy policy (the “**Policy**”). We are committed to the principles of public accountability and personal privacy. In our day-to-day activities, we collect important personal information about prospective, current and past participants, employees, members, donors and volunteers in order to make decisions about admission, evaluation of performance and suitability of position. It is our policy to control the collection, use and disclosure of personal information in accordance with the [Fair Information Principles](#), [The Alberta Personal Information Protection Act](#), [The Freedom of Information and Protection of Privacy Act](#), [The Personal Information Protection and Electronic Documents Act](#) of Canada and other substantially similar and applicable privacy legislation.

Purpose

Momentum needs your personal information for the following purposes:

1. to determine if you qualify for one of our programs, including the Momentum Savings Challenge offered through our partnership with QUBER Technologies, Inc. (“**QUBER**”), offered by way of QUBER’s mobile application (the “**QUBER App**”);
2. to determine if you qualify for an employment, volunteer or participant position;
3. to understand and meet the needs, concerns and opinions of:
 - Website users
 - Future and past savings challenge participants
 - Members
 - Our employees
 - Our volunteers
 - Our donors
4. to meet legal and regulatory requirements; and
5. to raise funds for Momentum.

We will only use your personal information in accordance with this Policy unless otherwise required by applicable law. We take steps to ensure that the personal information that we collect about you is adequate, relevant, not excessive, and used for limited purposes.

Application

This Policy applies to information we collect, use, or disclose about our users (“**you**”):

- on this website;
- in email, text, and other electronic messages between you and Momentum;

- when you interact with our advertising and applications on third-party websites and services if those applications or advertising include links to this Policy; and
- through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website.

The Website may include links to third-party websites, plug-ins, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. If you follow a link to a third-party website or engage a third-party plugin, please note that these third parties have their own privacy policies and we do not accept any responsibility or liability for these policies. We do not control these third-party websites, and we encourage you to read the privacy Policy of every website you visit.

Please read this Policy carefully to understand our policies and practices for collecting, processing and storing your information. If you do not agree with our policies and practices, your choice is not to use our website. By accessing or using this Website, or other services provided by Momentum, you indicate that you understand, accept and consent to the practices described in this Policy. This Policy may change from time to time. Your continued use of this Website after we make changes indicates that you accept and consent to those changes, so please check the Policy periodically for updates.

Information

This Policy describes how we **collect, use, disclose, and protect** your personal information the types of information we may collect from you or that you may provide to us when you participate in a savings challenge, and our practices for collecting, using, maintaining, protecting, and disclosing that information.

Information we collect about you

We collect and use several types of information from and about you, including:

- **Personal information**, that we can reasonably use to directly or indirectly identify you, such as your name, mailing address, e-mail address, telephone number, internet protocol (IP) address used to connect your computer to the Internet, user name or other similar identifier, savings preferences, income levels, and any other identifier we may use to contact you ("**personal information**").
- **Non-personal information**, that does not directly or indirectly reveal your identity or directly relate to an identifiable individual, such as demographic information, or statistical or aggregated information. Statistical or aggregated data does not directly identify a specific person, but we may derive non-personal statistical or aggregated data from personal information. For example, we may aggregate personal information to calculate the percentage of users accessing a specific Website feature.
- **Technical information**, including your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, or information about your internet connection, the equipment you use to access our Website, and usage details.
- **Non-personal details about your Website interactions**, including the full Uniform Resource Locators (URLs), clickstream to, through and from our Website (including date and time), topics you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, or any phone number used to call us.

How we collect information about you

We use different methods to collect your information, including through:

- **Direct interactions with you when you provide it to us**, for example, by filling in forms or corresponding with us by phone, email, or otherwise.
- **Automated technologies or interactions**, as you navigate through our Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies or other tracking technologies.
- **Third parties**, such as QUBER or other business partners.

Why we collect information about you

Generally, we collect information from you for the purposes of establishing and managing our relationship with you. More specifically, we collect your personal information for the following purposes:

- to present our Website and its contents to you;
- to provide you with information, products, or services that you request from us;
- to allow you to participate in various savings challenges hosted by Momentum;
- to deliver to you any administrative notices, alerts and communications relevant to your use of our services;
- to market products and services that we believe may be of interest to you;
- to de-identify your personal information and create aggregated data;
- to enforce our Terms of Use;
- for purposes permitted by and to comply with any legal or regulatory requirements and laws; and
- for such purposes otherwise identified to you from time to time or as you may otherwise consent.

Disclosure of your information

We may disclose personal information that we collect or you provide as described in this Policy:

- to comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law;
- to contractors, service providers, and other third parties we use to support our business (such as analytics and search engine providers that assist us with Website improvement and optimization) and who are contractually obligated to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information with the same standards set out in this Policy.
- to conduct random income audits that are related to savings challenges as offered by way of the QUBER app;
- to fulfill the purpose for which you provide it;

- for any other purpose disclosed by us when you provide the information; or
- with your consent.

Data security

The security of your personal information is very important to us. We use physical, electronic and administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure.

The safety and security of your information also depends on you. Where you have chosen a password for access to certain parts of our Website or certain savings challenges through the QUBER App, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to us or our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Data Retention

Momentum shall implement a retention and disposition schedule of documents to ensure that documents remain relevant for the identified purposes or as required by law. Depending on the circumstances, where personal information has been used to make a decision about a prospective, current or past participant, member, employee, volunteer or donor, Momentum shall retain, for a period of time that is reasonably sufficient to allow for access by the person, either the actual information or the rationale for making the decision.

When information is no longer considered relevant for the identified purposes or required by law to be retained, such information shall be destroyed, erased, sent to the archives or made anonymous.

Accessing & Correcting Your Personal Information

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes. By law, you have the right to request access to and correct the personal information that we hold about you.

If you wish to review, verify, correct or withdraw consent to the use of your personal information you may also send us an email at **privacy@momentum.org** to request access to, correct, or delete any personal information that you may have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, erased, or made your personal information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Privacy Policy Subject to Change

Momentum reserves the right to modify or supplement this Policy at any time. If any changes are made to this Policy, we will notify you by posting a copy amended Policy on our website at www.momentum.org as soon as practicable following that update. Your continued use of the Website and, if applicable, your continued participation in the savings challenges hosted by Momentum, following such notification will be deemed to constitute your consent to such revised terms.

The Ten Principles of Fair Information

The information will be used with Momentum's 10 principles of Fair Information in mind

1. **Accountability:** Momentum is responsible for personal information under its control and has designated individuals who are accountable for the organization's compliance with the fair information principles, [Alberta's Personal Information Protection Act](#) and other current applicable privacy legislation.
2. **Identifying Purpose:** The purpose for which personal information is collected shall be identified by Momentum during to or prior to the time information is collected. Personal information will not be used for any other purpose than that for which it has been designated.
3. **Consent:** Knowledge and consent of the individual is required for the collection, use or disclosure of personal information.
4. **Limiting Collection:** Collection shall be limited to personal information that is necessary for the purposes identified by Momentum.
5. **Limiting Use:** Disclosure and Retention: Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with consent or as required by law.
6. **Accuracy:** Personal information shall be accurate, complete and up to date as necessary for the purpose for which it is to be used.
7. **Safeguards:** Personal information is protected by security safeguards appropriate to the sensitivity of the information.
8. **Openness:** Momentum shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.
9. **Individual Access:** Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information.
10. **Challenging Compliance:** An individual is able to address a challenge by making an inquiry with the Operations Manager for compliance with privacy principles.