

FNFA Privacy Policy

Introduction: This privacy policy summaries the privacy practices and activities of the First Nations Finance Authority (FNFA) under the Personal Information Protection and Electronic Documents Act (PIPEDA).

Our Commitment: The FNFA owns and operates www.fnfa.ca. The FNFA is committed to protecting the privacy of personal information collected from its employees, members, suppliers, and others, and to ensuring such information is used only for appropriate purposes. Personal information is recorded information about an identifiable individual, but does not include the individual's name, business title, business address, business telephone number, and membership status.

Consent, Collection, and Use: Consent is obtained at the time personal information is collected. The specific use for which it is intended is identified at that time. Those uses include, but are not limited to, the following:

- to provide services
- to employ staff
- to purchase products and services
- to advise of FNFA products and services
- to respond to inquiries and to communicate with members.

Third party vendors, suppliers, and providers: From time to time FNFA may share your personal information with third party vendors, suppliers, and providers responsible for administering activities on our behalf. Such third parties are required to have privacy policies or to abide by FNFA's policies as relevant to the personal information shared with them. Notwithstanding, personal information may be used as otherwise permitted or required by law.

Limitations on Use: Any individual from whom information is collected may request that such information be used for no purpose other than that for which it was collected. This request may be made at any time. Such a limitation does not bar FNFA from using such information as permitted or required by law.

Access and Accountability: FNFA has undertaken a comprehensive review of practices to ensure proper safeguards for personal information in its custody and control and has implemented physical, organizational, contractual, and technological security measures to protect such information from loss, theft, unauthorized access, disclosure, copying, use or modification, both in hard-copy and online. Only staff whose duties require access to personal information are granted such access, and only to the extent necessary. Staff are accountable for ensuring this policy is followed at all times.

Dated: September 24, 2020.

Individual Access and Accuracy: Individuals from whom information is collected may access that information at any time and may challenge the accuracy and completeness of the information and have it amended as appropriate. FNFA endeavours to ensure the information collected is accurate, through updates by our members and at other times as required by bylaw.

Communicating with FNFA: If you choose to send the FNFA an email or complete a feedback form online, your personal information is used by the FNFA in order to respond to your inquiry. The information you provide will only be shared with another institution if your inquiry relates to that institution. The FNFA does not use the information to create individual profiles nor does it disclose the information to anyone other than to those in the FNFA who need to provide you with a response. Any disclosure of your personal information is in accordance with the (PIPEDA).

Your Privacy and the Internet: The nature of the internet is such that web servers automatically collect certain information about a visit to a website, including the visitor's Internet Protocol (IP) address. IP addresses are unique numbers assigned by Internet Service Providers (ISP) to all devices used to access the internet. Web servers automatically log the IP addresses of visitors to their sites. The IP address, on its own, does not identify an individual. However, in certain circumstances, such as with the co-operation of an ISP for example, it could be used to identify an individual using the site. For this reason, the FNFA considers the IP address to be personal information, particularly when combined with other data automatically collected when a visitor requests a web page such as the page or pages visited, date and time of the visit.

Unless otherwise noted, the FNFA does not automatically gather any specific information from you, such as your name, telephone number or email address. The FNFA would obtain this type of information only if you supply it to the FNFA, for example, by email or by filling in a contact form.

In cases where services are provided by organizations outside of the FNFA, such as social media platforms or mobile applications, IP addresses may be recorded by the web server of the third-party service provider.

Web Analytics: Web analytics is the collection, analysis, measurement, and reporting of data about web traffic and visits for purposes of understanding and optimizing web usage. Information in digital markers may be used for the purpose of web analytics to remember your online interactions with the FNFA Site.

The FNFA uses server log analysis software and Google Analytics to improve the FNFA Site. When your computer requests a FNFA web page, our institution collects the following types of information for web analytics:

- the originating IP address;
- the date and time of the request;
- the type of browser used; and
- the page(s) visited.

Protecting the Security of FNFA: The FNFA employs software programs to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage. This software receives and records the IP address of the computer that has contacted the FNFA Site, the date and time of the visit and the pages visited. We make no attempt to link these addresses with the identity of individuals visiting a FNFA Site unless an attempt to damage a FNFA Site has been detected.

Questions or Concerns: Privacy practices for FNFA's various activities are reviewed regularly and updated as necessary. Any questions or concerns regarding this policy or its implementation should be directed to the FNFA Privacy Officer: President & CEO, 202 - 3500 Carrington, Road Westbank, B.C. V4T 3C1, Telephone: 250.768.5253 Toll free: 866.575.3632 Fax: 250.768.5258.

Inquiring about these Practices: If you are not satisfied with the FNFA's response to your privacy concern, you may wish to contact the <u>Office of the Privacy Commissioner</u> by telephone at 1-800-282-1376.

Dated: September 24, 2020.