



# Privacy Policy (PIPA)

## Introduction

Habitat for Humanity Bermuda ("Habitat"), is committed to protecting the privacy and confidentiality of the personal information of our clients, donors, volunteers, employees, and all individuals with whom we interact. This Privacy Policy describes our practices in respect of the collection, use, disclosure, retention, and safeguarding of personal information, and sets out our ongoing obligations under the Personal Information Protection Act ("PIPA") and other applicable laws in Bermuda.

## Collection of Personal Information

We collect only the personal information necessary for the administration of our charitable activities, including but not limited to information provided on application forms, donation records, volunteer applications, employment records, and communications with our organization. Information collected includes, but is not limited to, name, contact details, and information required to fulfill our charitable mission.

## Purpose and Use of Personal Information

Personal information is collected and used for the following purposes:

- To assess eligibility for and administer Habitat's programs and services
- To process and acknowledge donations
- To manage volunteer participation
- To maintain employment records for staff members
- To comply with legal and regulatory requirements
- To communicate with individuals regarding our activities and opportunities
- To collect information for subscriptions to either the Habitat Newsletter or ReStore Membership

Personal information will not be used for purposes other than those for which it was collected, except with consent or as required or permitted by law.

## Privacy Notices and Consent

Before or at the time of collecting personal information, Habitat provides a clear privacy notice specifying:

- The contact details for privacy inquiries
- The types of information being collected
- The intended uses of the information
- Who will handle and have access to the information
- Any sharing of information with third parties

This notice is clearly visible online, and is available upon request. Consent is obtained from individuals before collecting their information, and individuals have the right to withdraw their consent at any time, subject to legal or contractual restrictions.

## Confidentiality and Security Safeguards

Habitat maintains strict confidentiality of all personal information. We employ a range of physical, organizational, and technological safeguards to protect information from unauthorized access, loss, or misuse. This includes restricted access to records in both paper and electronic formats and policies limiting access only to those who need it to perform their duties.

## Retention and Destruction of Personal Information

Habitat retains personal information only as long as necessary to fulfill the purposes for which it was collected, or as required by law. Time limits for retention will vary depending on the record type (e.g., donor, volunteer, employee, board minutes). When personal information is no longer required, it is securely destroyed or anonymized.

## Ongoing Review and Accountability

Our privacy practices are subject to ongoing review. Habitat will conduct annual reviews, or more frequent reviews as required by risks or regulatory changes, to ensure continued compliance with PIPA and our privacy standards. This includes reviewing the reasons for retaining information and conducting internal audits or engaging external auditors as appropriate.

## Third Party Service Providers

Habitat may engage third parties to provide services. We review all service contracts and conduct due diligence to ensure that all service providers comply with our privacy requirements and maintain appropriate safeguards for any information they handle on our behalf.

## Appointment of a Privacy Officer

Habitat is in the process of appointing a Privacy Officer who will be responsible for overseeing our compliance with this policy and applicable privacy laws, responding to privacy inquiries, managing complaints, and guiding ongoing training and awareness efforts for staff, board members, facilitators, and volunteers.

## Access and Correction

Individuals have the right to access their personal information held by Habitat and to request corrections to ensure its accuracy and completeness. Requests should be directed to our Privacy Officer.

## Changes to This Policy

This Privacy Policy may be amended from time to time to reflect changes in our practices or legal requirements. All employees, board members, facilitators, and volunteers will be informed of any updates and are responsible for reviewing such changes.

## Contact Us

Questions, concerns or requests relating to privacy or this policy may be directed to the Executive Director at Habitat for Humanity Bermuda at [sandrac@habitat.bm](mailto:sandrac@habitat.bm)