THE CHANGE COALITION PRIVACY POLICY AGREEMENT

Effective Date: July 2026

Organization: The Change Coalition (TCC)

Corporate Jurisdiction: Canada (PIPEDA Compliant)

Official Platform URL: https://changecoalition.ca/

1. Corporate Commitment to Privacy & Data Integrity

The Change Coalition (TCC) strictly respects the statutory privacy rights, inherent dignity, and absolute confidentiality of all individuals interacting with our organizational frameworks, including but not limited to program participants, donors, volunteers, strategic corporate partners, and web platform visitors. Operating as a dedicated national advocacy organization supporting Canadians living with invisible, hidden, and non-apparent disabilities, TCC recognizes that personal information captured under these systems contains highly sensitive data concerning individual diagnostic experiences, physiological/cognitive accessibility friction points, and private socio-economic constraints. Accordingly, TCC guarantees full compliance with applicable federal and provincial legislative standards governing the secure collection, operational processing, custodial storage, and structured transmission of Protected Personal Information (PPI).

2. Scope and Legislative Intent of this Agreement

This Privacy Policy Agreement establishes the rigorous operational protocols, legal mandates, and compliance mechanisms enforced by TCC to safeguard individual data assets. TCC operates under a strict, human-in-the-loop proactive notice framework. TCC does not use automated decision-making systems, artificial intelligence (AI), or automated triage algorithms to evaluate programmatic eligibility, process sensitive diagnostic disclosures, or filter incoming user communications. This document defines:

- **Identified Data Fields:** The specific classification of personal information subject to explicit manual database entry.
- **Statutory Lawfulness:** The explicit legal and operational justifications underpinning data collection processes.
- **Information Safekeeping:** The physical and verified technical security frameworks structured to prevent data exposure.
- **Structured Disclosures:** The narrow, legally validated scenarios under which personal records may be shared.
- **Access and Correction Frameworks:** The formal mechanism enabling data subjects to exercise rights of correction or retrieval.
- **Ombudsman Protocols:** The administrative escalation pathway dedicated to evaluating and remediating data governance concerns.

3. Authorized Classifications of Collected Data Assets

The scope of information captured by TCC is strictly delimited by the principle of data minimization. TCC processes the following explicitly defined, itemized data streams only:

3.1 Primary Identity and Contact Records

- Full legal name and authorized corporate aliases.
- Verified electronic mail coordinates (designated as an optional field for general web engagement).
- Telephone numbers, retained exclusively via voluntary opt-in channels, used solely to provide requested voice or text updates. TCC does not collect or store communication metadata, call duration records, or network logs.
- Physical mailing coordinates (where strictly required for transaction fulfillment or tax receipt issuance).

3.2 Programmatic and Supportive Service Data

- Formal programmatic application profiles and historical eligibility verifications.
- Documented physical, sensory, or neurological accommodation requirements.
- Voluntary qualitative feedback, survey results, and programmatic evaluations.

3.3 Protected Health Information and Accommodation Records

TCC acknowledges that data subjects may explicitly disclose sensitive health data, including diagnostic disabilities, chronic illness presentations, and systemic physical barriers. This data stream is processed exclusively via explicit, voluntary consent loops to provision workspace accommodations or deploy appropriate therapeutic resources (such as sensory grounding tools and Comfort Quilts).

3.4 Fiduciary and Donor Ledger Ingestion

- Full legal name of the contributing entity or individual.
- Mailing coordinates explicitly required to generate formal Canada Revenue Agency (CRA) tax receipts.
- Granular transaction parameters, including exact payment amounts and asset classifications.

4. Granular Opt-In Rights Governing Donor Email Collection

The provision of a digital email address to TCC remains an explicitly elective, voluntary action. Non-Prejudicial Access Guarantee: A data subject’s explicit decision to withhold or retract an electronic mail coordinate will result in no adverse or prejudicial restrictions. The absence of an email record shall never limit an individual's right to execute a physical donation, enroll in community programs, or fully engage with the core advocacy platforms of TCC.

5. Digital Infrastructure and Cookie Protocols

To maintain web optimization, system stability, and compliance with accessibility laws, the TCC web platform utilizes standard technical logging. TCC employs HTTP cookies and related localized cache tokens exclusively to enhance platform user experience, preserve customized visual accessibility preferences, and analyze anonymized site traffic trends. Data subjects retain the absolute technical right to modify or completely restrict cookie deployment via native web browser configurations without facing platform service termination.

6. Strict Purpose-Limitation of Data Processing

TCC processes Protected Personal Information solely for legitimate, legally validated organizational operations, including direct delivery of charitable programs, inquiry processing, securing authorized payment verifications, and fulfilling applicable federal, provincial, regulatory, accounting, and funding-tied reporting obligations.

7. Consent Verification and Retraction Frameworks

TCC operates under an explicit consent architecture. Data subjects retain an unalienable, continuous right to update, limit, or entirely withdraw their consent matrices at any time. Revocation can be instantly initiated via automated digital unsubscribe elements embedded directly within all outgoing communications, or by routing a direct notification to the designated privacy contact address.

8. Data Commercialization Refusal and Strict Third-Party Disclosure Controls

Absolute Zero-Commercialization Injunction: TCC strictly prohibits the selling, renting, trading, licensing, or unauthorized commercial distribution of donor lists, email databases, or personal profile data to any external third party. Downstream disclosure of protected records is restricted exclusively to explicit affirmative consent, structurally mandatory transaction loops, contractually bound technology sub-processors (e.g., Stripe for payment gateways), or where required by a legally binding warrant, subpoena, or explicit court order.

9. Data Security Infrastructure and Technical Safeguards

TCC maintains rigorous technical, physical, and administrative safeguards engineered to defend Protected Personal Information against unauthorized exposure, structural loss, systemic misuse, or illicit alteration. TCC secures all Protected Personal Information using Advanced Encryption Standard with a 256-bit key length (AES-256) at rest and Transport Layer Security version 1.3 (TLS 1.3) encryption in transit. Access to core databases is protected by mandatory multi-factor authentication (MFA), role-based access limits restricted solely to authorized personnel, and binding non-disclosure agreements executed across all staff members, volunteers, and Board Directors.

10. Data Retention Mandates and Incident Response Remediation

10.1 Structured Retention Limits

TCC enforces strict data minimization timelines. Programmatic and health accommodation records are permanently erased, physically incinerated, or completely anonymized within twenty-four (24) months of an individual’s last active engagement with TCC, unless a longer retention framework is explicitly mandated by federal tax, audit, or legislative filing obligations.

10.2 Cyber Incident and Breach Mitigation Protocols

In the event of a suspected or confirmed data exfiltration incident or security breach, TCC triggers an immediate incident containment protocol to assess scope, secure network points, notify affected data subjects, and report details directly to the Office of the Privacy Commissioner of Canada (OPC) and relevant provincial authorities in accordance with statutory mandatory breach reporting regulations.

11. Data Subject Access Rights, Amendments, and Rectification

Data subjects maintain full statutory rights of access regarding any personal records held within TCC active data repositories. Individuals may file formal documentation requests to inspect, audit, amend, or correct any record identified as inaccurate, outdated, or legally deficient. All access requests must be routed in writing to the corporate privacy compliance desk at privacy@changecoalition.ca.

12. Absolute Anonymity and Philanthropic Confidentiality Pledges

TCC holds the relationship with its donor base in strict confidence. No public acknowledgment, promotional disclosure, or institutional listing of financial contributions will occur unless the donor has granted explicit, written authorization.

13. Periodic Amendments and Regulatory Updates

TCC reserves the right to periodically amend this Privacy Policy Agreement to reflect structural modifications to programmatic services, software infrastructure updates, or shifts in statutory frameworks.

14. Corporate Compliance, Contact, and External Recourse Details

For any inquiries, structural complaints, or formal statutory access requests under this framework, please contact the designated data protection office directly:

The Change Coalition — Corporate Privacy Compliance Division

Legal & Compliance Mail Desk: privacy@changecoalition.ca

General Operations Intake: info@changecoalition.ca

External Recourse: If our Privacy Compliance Division does not resolve your concern to your satisfaction, you have the statutory right to escalate the matter by filing a formal complaint with the **Office of the Privacy Commissioner of Canada (OPC)** via their official channels (complaints@priv.gc.ca).