



# SOUTHLAKE

REGIONAL HEALTH CENTRE  
FOUNDATION

Last revised January 5, 2005  
By: McMillan Binch, LLP

## **Privacy Policy**

### *Our Privacy Commitment*

Southlake Regional Health Centre Foundation (the “**Foundation**”) is committed to protecting donors’ privacy and the security of their personal information. As part of this commitment, the Foundation has developed this Privacy Policy and related privacy procedures.

This Privacy Policy applies to the Foundation and its employees, volunteers and board members. This Privacy Policy covers all personal information under the Foundation’s control regardless of what medium is used to store, move or copy that information (e.g., paper, electronic, oral).

The Foundation collects, uses and discloses personal information in accordance with the *Personal Health Information Protection Act* (Ontario) and the ten privacy principles found in the Canadian Standards Association’s *Model Code for the Protection of Personal Information*, which forms the basis of that Act as well as most privacy legislation in the world.

The Foundation will review this Privacy Policy from time to time to ensure that it is relevant and remains current with changing laws and regulations. This Privacy Policy is current as of the “Last revised” date set out above.

### *Our Privacy Standards*

#### *Principle 1 - Accountability*

The Foundation accepts responsibility for protecting donors’ personal information under its control, including personal information that it transfers to third parties for processing.

- The Foundation has a designated individual, known as the Chief Privacy Officer, who is accountable for the Foundation’s compliance with this Privacy Policy. The Chief Privacy Officer is the Director of Administration and Annual Development.

- Individual Directors and Managers are responsible for overseeing compliance with this Privacy Policy by those employees and volunteers under their areas of responsibility.
- Each employee, volunteer or board member:
  - has an individual responsibility to comply with this Privacy Policy,
  - must sign a Confidentiality Agreement with the Foundation,
  - must receive training about the Foundation’s Privacy Policy and related procedures, and
  - is expected to take personal responsibility for the following:
    - reporting any condition that may threaten the confidentiality or security of personal information to the Chief Privacy Officer,
    - reporting any complaints to the Chief Privacy Officer,
    - helping to resolve issues and implement improvements, and
    - keeping up-to-date on the Foundation’s policies and related procedures.
- The Foundation takes reasonable steps to protect personal information that it transfers to others (for example, by including privacy clauses in its contracts with others who handle and/or process donors’ personal information).
- The Foundation has implemented procedures to give effect to this Privacy Policy:
  - to manage the collection, use, retention, storage, transfer, disclosure, accuracy, correction and disposal of donors’ personal information,
  - to receive and respond to inquiries and complaints,
  - to train employees, volunteers and board members about the Foundation’s Privacy Policy and related procedures, and
  - to analyze new initiatives that may affect personal information.
- Donors with questions on this Privacy Policy should contact the Foundation’s Chief Privacy Officer at:

Southlake Regional Health Centre Foundation  
 Chief Privacy Officer  
 615 Davis Drive, Suite 101  
 Newmarket, ON L3Y 2R2

***Principle 2 - Identifying Purposes***

The Foundation identifies the purposes for which it collects, uses and discloses personal information prior to the time the personal information is collected. The Foundation only collects, uses and discloses personal information necessary for the identified purposes.

- The Foundation collects personal information to:
  - process donations,
  - keep donors informed about Foundation and Southlake Regional Health Centre activities,
  - ask individuals for their support, and
  - comply with legal and regulatory requirements.
  
- The Foundation engages in the following activities:
  - direct marketing (Direct Mail),
  - major gift activity,
  - planned giving,
  - tax receipting,
  - donor recognition activities such as stewardship reports, plaquing, printed articles, tours and events,
  - dinners and gala’s both as fundraising and stewardship events,
  - third party community events,
  - public relations activities in the hospital community,
  - publications and communications,
  - donor surveys, and
  - other related activities.
  
- The Foundation identifies any new purposes for collecting, using or disclosing personal information before such collection, use or disclosure.
  
- The Foundation uses the following information to achieve its identified purposes:
  - name,
  - contact information,
  - demographic information, and
  - history of charitable giving to the Foundation.

***Principle 3 - Consent***

The Foundation obtains consent from donors for its collection, use and disclosure of their personal information for the identified purposes. In some cases, the Southlake Regional Health Centre obtains consent to disclose potential donors’ names and mailing addresses for the Foundation’s identified purposes as part of its routine collection of patient information.

- The Foundation does not collect personal information beyond that required to fulfill the identified purposes (for example, the Foundation does not collect personal health information).

- A donor may withdraw consent for any identified purpose at any time, subject to legal and contractual restrictions and reasonable notice. An opt-out option is available on printed and electronic publications. If a donor withdraws consent, the Foundation complies with the request.

***Principle 4 - Limiting Collection***

The Foundation limits its collection of personal information to that which is necessary to fulfill its identified purposes. The Foundation collects personal information by fair and lawful means.

- The Foundation limits both the amount and type of personal information collected to what is necessary to fulfill the identified purposes.
- The Foundation does not collect a donor’s personal information indiscriminately or in a misleading manner.
- The Foundation does not collect any personal **health** information.
- The Foundation will not discuss a donor’s **state of health** or **health care** when it contacts the donor for fundraising purposes.

***Principle 5 - Limiting Use, Disclosure and Retention***

The Foundation does not use or disclose personal information for purposes other than those for which it was collected, except with the donor’s consent or as permitted or required by law. The Foundation retains personal information only as long as necessary to fulfill the identified purposes or as otherwise permitted or required by law.

- The Foundation only grants access to personal information to Foundation employees, volunteers, board members or authorized agents with a need to know the information for reasonable business purposes.
- The Foundation **does not** sell, rent or trade personal information with others.
- Once collected, all personal information is stored securely.
- When the retention period expires, the Foundation destroys, erases or makes anonymous, all copies of the personal information.

***Principle 6 - Accuracy***

The Foundation keeps personal information as accurate, complete and up-to-date as is necessary for its identified purposes.

- The Foundation updates donors’ personal information as it is made available to the Foundation, and only if the information is necessary to fulfill the identified purposes.
- Donors may request amendments to their personal information by contacting the Chief Privacy Officer.

***Principle 7 - Safeguards***

The Foundation protects donors’ personal information with security safeguards appropriate to the sensitivity of the information.

- The Foundation protects donors’ personal information against theft, loss and unauthorized access, copying, modification, use, disclosure and disposal through safeguards that are appropriate to the sensitivity of the information. A higher level of protection is used to safeguard more sensitive personal information.
- The Foundation stores donors’ personal information securely. The methods of protection the Foundation uses to protect donors’ personal information include:
  - physical measures, for example, locking filing cabinets and restricting access to offices;
  - organizational measures, for example, security clearances, limiting access on a “need-to-know” basis and privacy training, and
  - technological measures, for example, using passwords and access controls.
- The Foundation has developed training programs and provides employees, volunteers and board members with information about this Privacy Policy and related procedures. The Foundation ensures that these people are aware of the importance of maintaining the security and confidentiality of donors’ personal information and requires them to sign a Confidentiality Agreement.
- All independent contractors, vendors and suppliers that work with the Foundation’s personal information must also sign a Confidentiality Agreement.
- The Foundation disposes and destroys donors’ personal information with care to prevent unauthorized parties from gaining access to the information.

***Principle 8 - Openness***

The Foundation makes information available about its Privacy Policy and related procedures concerning the management of personal information.

- Donors may easily acquire information about:

- the name and contact information for the Foundation’s Privacy Officer for the purpose of questions and complaints,
- the means of gaining access to personal information held by the Foundation,
- a description of the type of personal information held by the Foundation, including a general account of its use, and
- a copy of the Foundation’s Privacy Statement.

***Principle 9 - Access***

Upon request, the Foundation will give donors access to their personal information holdings and an account of their use and disclosure. A donor can challenge the accuracy and completeness of the information and have it amended as appropriate.

***Principle 10 - Challenging Compliance***

The Foundation has procedures in place to receive and respond to donor inquiries and complaints about the handling of their personal information.

- Donors who are not satisfied with the answer received about the subject of their inquiry may complain in writing to the Foundation’s Chief Privacy Officer.
- The Foundation’s Chief Privacy Officer will investigate all complaints under the Foundation’s complaint procedures.
- When necessary, the Foundation will take appropriate measures, including amending its Privacy Policy and related procedures or amending a donor’s personal information holdings. Where appropriate, the Foundation will also provide the amended information to third parties having access to the donor’s personal information.
- The Foundation may seek external advice before providing a final response to donors concerning their complaints.
- When a complaint is not resolved to a donor’s satisfaction, the Foundation’s Chief Privacy Officer will record the substance of the unresolved complaint, and where appropriate, will transmit the existence of the unresolved complaint to the Foundation’s Senior Management and any third parties who have had access to the personal information in question.
- Donors who are not satisfied with the results of the complaint may also contact the Office of the Information and Privacy Commissioner/Ontario at:

Office of the Information and Privacy Commissioner/Ontario  
 2 Bloor Street East, Toronto, Ontario M4W 1A8  
 Tel. 416.326.3333 or 1.800.387.0073  
 Email [info@ipc.on.ca](mailto:info@ipc.on.ca)

### ***Incident Recognition, Response, Reporting and Follow-Up***

All employees, volunteers and board members must ensure that the privacy of donors and the confidentiality and security of their personal information is preserved at all times. Anyone who observes a breach or potential breach of privacy must report the details as soon as possible to the Foundation's Privacy Officer. The Privacy Officer will discuss the issue with the President of the Foundation.

Anyone who fails to comply with this Privacy Policy will be subject to disciplinary action, up to and including termination of employment or association with the Foundation. Examples of violations of this Privacy Policy include:

- Accessing information that is not required for job purposes,
- Misusing, disclosing without proper authorization, or altering donor information,
- Disclosing to another person one's password for accessing electronic records.

### ***Training***

The Foundation will ensure that everyone who works with the Foundation has a good understanding of this Privacy Policy and its related procedures through privacy training sessions and other communications.

### ***Routine Assessment of Systems and Procedures***

The Foundation will routinely assess information systems and work processes to confirm that donor privacy is protected, and that only authorized individuals with a "need-to-know" have access to personal information. Whenever significant changes are proposed or undertaken for information systems or work processes, and whenever substantial external services and products are evaluated or contracted to assist with information management, the Foundation will conduct a privacy impact assessment.

### ***Audits and Reviews***

The Chief Privacy Officer will periodically conduct internal reviews and external audits of the Foundation's Privacy Policy and related procedures with a view to maintaining and improving their effectiveness and complying with relevant legislation.

### ***Reporting***

The Foundation's management will report annually to the board of directors on matters concerning privacy compliance.