

# POLICY STATEMENT

**Board Approval:**

May 25, 2016

**Effective Date:**

May 30, 2016

**SUBJECT: Privacy Policy**

**Revised/Reviewed Date:**

May 25, 2016 January 2016

**Approved by the Board of Directors February 16, 2004**

## Background

Health Sciences North Foundation (“the Foundation”) (HSNF) is a registered charity that collects, raises and distributes funds for the benefit of the Health Sciences North and other health-related institutions in northeastern Ontario. The Foundation needs to collect personal information in order to fulfill its mandate.

## Purpose of this Policy

The Foundation has developed this Privacy Policy for implementation beginning January 1, 2004. This Policy describes the way that the Foundation collects, uses, retains, safeguards, discloses and disposes of the personal information for fundraising purposes. The Privacy Policy describes the way that the Foundation will, subject to applicable legal requirements, adhere to all relevant federal and provincial legislative privacy requirements. The Policy follows the 10 Canadian Standards Association’s Model for the Protection of Personal Information (CAN/CSA-Q830-96) principles identified in the federal Personal Information Protection and Electronic Documents Act (PIPEDA). The Privacy Policy describes each principle and the method of implementing each. The Foundation will strive to meet or exceed federal and provincial legislative requirements and will ensure that it remains current with changing technologies and laws. Any and all changes will immediately be posted to the Foundation web site and be made available through other means upon request.



## **1. Accountability**

- 1.1** Health Sciences North Foundation will appoint a staff person (the "Privacy Officer") whose responsibilities will include those of the implementation and monitoring of the Foundation's Privacy Policy. The Privacy Officer will be responsible for the Foundation's compliance with privacy principles. This person will also be responsible for responding to access requests in accordance with this Policy. The Privacy Officer will report to the Executive Committee of the Board of Directors and the ultimate responsibility for Privacy issues will rest with the Board of Directors. The Privacy Officer may at his/her discretion enlist assistance from other staff members and/or volunteers within the organization. This will not in any manner mitigate his/her responsibility for Privacy issues.
- 1.2** The Privacy Officer may be contacted at 705-523-7130 or [foundation@hsnsudbury.ca](mailto:foundation@hsnsudbury.ca).
- 1.3** Health Sciences North Foundation's Privacy Officer will ensure that the Foundation manages all personal information in its possession in accordance with this Policy including that which may be transferred to a third party. Third party organizations who handle information on behalf of the Foundation shall be contractually obligated to adhere to the standards of the Foundation.
- 1.4** The Foundation will implement internal policies which will facilitate adherence to this Privacy Policy including but not limited to the following:
- Security measures at all levels designed to protect personal information in our possession.
  - Implementing procedures designed to respond to complaints and/or inquiries.
  - Staff training in all facets of information management, including awareness of the Foundation's Privacy Policy and policies and procedures developed in accordance with the Policy.

## **2. Identifying Purposes, Type of Information Collected and Website**

- 2.1** Health Sciences North Foundation shall only collect personal information reasonably necessary to conduct ongoing charitable work including but not limited to approaching individuals by mail, telephone, email or in person regarding donation and recognition possibilities.
- 2.2** Health Sciences North Foundation collects personal information from donors, prospective donors, publications and affiliate organizations for the purposes of fulfilling its charitable mandate. Specifically:
- To process and receipt donations
  - To provide information to donors and supporters about Health Sciences North Foundation and the Foundation's upcoming events and ways to get involved
  - To provide donors with stewardship information and recognition
  - To respond to information requests from donors and supporters



- To solicit potential donors
- To request feedback and provide evaluation opportunities
- Personal information collected for the purposes above may also be used for specific research purposes including but not necessarily limited to demographic type research. When personal information is used for a purpose not identified above, the new use will be identified and consent of the individual is required before personal information can be used for that purpose, unless the new purpose is required by law.

**2.3** Health Sciences North Foundation respects the privacy of our donors and we do not rent, sell, or trade our lists. All personal information that is collected by Health Sciences North Foundation will be carefully protected and use of such information is subject to consent. Donors and supporters have privacy options, including the option to limit use or opt-out of future contact.

**2.4** Health Sciences North Foundation will take steps throughout its normal course of activities to advise donors and potential donors of the purpose for the collection of the data requested at the time of collection or by reference to our web site at [www.hsnfoundation.com](http://www.hsnfoundation.com). We will further try to ensure that all collectors of the personal information are familiar with the potential use of the personal data. All personal data collected by Health Sciences North Foundation shall be maintained in its office at 41 Ramsey Lake Road, Sudbury, ON P3E 5J1

**2.5** Health Sciences North Foundation will request individual permission for the use of any personal data collected which is extraneous to that which has been identified above, unless said usage is authorized by law.

**2.6** Health Sciences North Foundation may also use information about an individual who accesses secure areas of [www.hsnfoundation.com](http://www.hsnfoundation.com). All such personal information will be treated within the same parameters as other personal information collected by the Foundation through other means. The choice to provide information in certain fields remains with the individual's although failure to complete certain sections may inhibit an individual's ability to fully access all areas of the web site. HSNF's web site also collects non-identifiable information about users such as the user's IP address, the sections of the web site visited and the information downloaded. The Foundation may use this non-identifiable information and disclose it to service providers, for system administration purposes and to improve the web site.

### **3. Consent**

**3.1** Health Sciences North Foundation will use the personal information for the uses specified in sections 2 and 3. By consenting to provide personal information to the Health Sciences North Foundation, individuals are deemed to consent to HSNF's use of the information for the purposes listed in Section 2 of this Privacy Policy

**3.2** The Foundation does not request, collect or have access to medical records, medical history or medical forms of individuals collected by Health Sciences North.



- 3.3** If at any time an individual wishes to withdraw consent to the use of their information for any purpose, individuals may do so by contacting Health Sciences North Foundation Privacy Officer at 705-523-7130 or [foundation@hsnsudbury.ca](mailto:foundation@hsnsudbury.ca). HSNF will accommodate requests in a timely fashion.
- 3.4** Health Sciences North Foundation may collect personal information without consent where reasonable to do so and where permitted by law.

#### **4. Limiting Collection**

- 4.1** All information shall be collected fairly and lawfully within the criteria as set forth in our Privacy Policy.
- 4.2** The Foundation shall not indiscriminately collect information. The amount and type of information collected shall be limited to that which is required to fulfill HSNF's identified purposes.
- 4.3** The Foundation will not use any form of deception in gaining personal information from its donors and supporters.

#### **5. Limiting Use, Disclosure and Retention**

- 5.1** Subject to applicable legislation, The Health Sciences North Foundation shall limit use of personal information it collects to purposes disclosed in Section 2 (Identifying Purposes).
- 5.2** Health Sciences North Foundation shall maintain documents for certain periods of time dependent upon necessity. More specifically:
- The Foundation will normally keep paper records for a seven-year period. Electronic records are kept indefinitely.
  - The Foundation may from time to time enlist the services of third party vendors in order to provide programs, technical and support services. Prior to enlisting the services of these firms, we will contractually commit them to treat your personal information consistent with the Privacy Policy of Health Sciences North Foundation.
  - The Foundation may, at some point be involved in the merger, transfer or reorganization of its activities. We may disclose personal information to the other party in such a transaction. The Foundation will ensure that we contractually obligate the other party to treat this information in a manner consistent with our Privacy Policy.
  - The Foundation may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where the association has reasonable grounds to believe the information could be useful in the investigation of an unlawful activity, or to comply with a subpoena or warrant or an order made by the court, person, or body with jurisdiction to compel the production of the information or otherwise as permitted by applicable law.
  - The Foundation may at its discretion release personal information for the purposes of collecting debts which may be owed to the Foundation.



- The Foundation will destroy, erase or render anonymous any personal information that is no longer required to fulfill identified purposes.

**5.3** Certain documents may be subject to legislated retention periods either federally or provincially and these will be respected at all times by the Health Sciences North Foundation.

## **6. Accuracy**

**6.1** Health Sciences North Foundation shall strive to ensure to the extent it can that the information entrusted to us is maintained in an accurate manner for the purpose it was originally collected. We shall try to maintain the interests of the individual and attempt to ensure that decisions are not made for or about an individual based on personal information that is flawed.

**6.2** Health Sciences North Foundation may from time-to-time update information to ensure accuracy. To update personal information, contact the Foundation at 705-523-7130.

## **7. Safeguards**

**7.1** Security safeguards have been implemented to ensure your personal information is protected from theft as well as unauthorized access, disclosure, copying, use or modification thereof.

**7.2** The level of safeguards employed shall be directly related to the level of sensitivity of the personal information collected. The more sensitive the information, the higher the level of security employed.

**7.3** Methods of protection and safeguards to be employed shall include, but in no way be necessarily limited to locked files, offices and storage areas, security clearances and need to know access as well as technological measures such as passwords and encryption.

## **8. Openness**

**8.1** The Health Sciences North Foundation publicly discloses the methods by which we handle personal information. This information is readily available through our Privacy Policy, on our web site or upon request by contacting the Foundation Privacy Officer at 705-523-7130 or by email at [foundation@hsnsudbury.ca](mailto:foundation@hsnsudbury.ca)

**8.2** The information available includes:

- The process by which individuals may follow to access personal information or change personal information.
- A description of the type of personal information held by Health Sciences North Foundation and HSNF's general uses thereof (as described in Section 2).



## **9. Individual Access**

- 9.1** Subject to applicable legislation, upon request by the individual concerned, Health Sciences North Foundation shall disclose whether or not it holds personal information on an individual. HSNF shall disclose the source of this information (if known) when requested
- 9.2** Health Sciences North Foundation may request sufficient information to confirm an individual's identity before releasing their personal information.
- 9.3** Subject to applicable legislation, the Health Sciences North Foundation shall make reasonable effort to provide this information within 30 days of receipt of the information requested and may charge a nominal fee for the purpose of off-setting its expenses incurred in supplying the requested information. This information shall be provided in an understandable format.
- 9.4** Any inaccurate information that is brought to HSNF's attention shall be corrected by the Health Sciences North Foundation as quickly as possible.

## **10. Challenging Compliance**

- 10.1** Health Sciences North Foundation has in place procedures for the resolution of grievances in the administration of its Privacy Policy.
- 10.2** Upon receipt of a complaint, Health Sciences North Foundation shall make available the complaint procedures.
- 10.3** Health Sciences North Foundation shall investigate all complaints. If the complaint is deemed justified, Health Sciences North Foundation shall take the appropriate steps to ensure that compliance is achieved and will make changes to its policies to allow for compliance in the future.
- 10.4** All complaints shall be addressed to the Health Sciences North Foundation Privacy Officer.

