

# **POLICIES & PROCEDURES**

**Policy Name** 

Privacy Policy

Approved by:

St-Boniface Hospital Foundation Board of Directors

Effective Date: March 18, 2016

Originated by:

St-Boniface Hospital Foundation Board of Directors

Date of Next Review: March 2019

# **PURPOSE**

St-Boniface Hospital Foundation is committed to protecting the privacy of the personal information of its employees, volunteers, donors, potential supporters, and other stakeholders. This policy is intended to ensure the proper handling, protection and maintenance of the integrity of personal information collected by the Foundation.

### **DEFINITIONS**

**Personal information** is any information that can be used to identify, distinguish, or contact a specific individual. Personal information can include facts about, or relate to, an individual, as well as an individual's opinions or beliefs. Personal information **does not** include publicly available information such as names, addresses and telephone numbers that are published in telephone directories, or business contact information such as the name, title, business address, or telephone number of an employee of an organization.

Personal Information Protection and Electronic Documents Act (2004) is the federal law that applies to personal information used or disclosed in the course of a commercial activity.

## **POLICY**

In the course of conducting its daily activities the St. Boniface Hospital Foundation collects and uses personal information. All information collected is carefully protected. The Foundation adheres to the privacy principles in the Personal Information Protection and Electronic Documents Act (PIPEDA) in the collection, use and maintenance of personal information.

The Foundation limits the amount of personal information collected about its donors and potential supporters, including name, title, address, telephone number, past donations, and other relevant contact information. This personal information is collected to comply with Canada Revenue Agency requirements, provide donors with periodic stewardship information and recognition, provide donors and potential supporters with information about Foundation activities, and promote opportunities for donors and potential donors to support the Foundation.

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Personal information collected by the Foundation is kept in confidence. Employees and volunteers are authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained, such as the issuance of tax receipts.

The Foundation collects, uses, and discloses personal information only for the purposes that a reasonable person would consider appropriate in the circumstances. The St. Boniface Hospital Foundation does not rent, sell, or trade mailing lists or other personal information.

**Website and Electronic Commerce:** The St-Boniface Hospital Foundation uses HTTPS protocol for secure communication over a network. The Foundation maintains a security appliance configured to prevent unwanted traffic from the Internet.

The St-Boniface Hospital Foundation accepts donations online using a secure third-party payment gateway provider. The Foundation adheres to and annually validates compliance, with the Payment Card Industry (PCI) security standards.

To issue charitable tax receipts, the St-Boniface Hospital Foundation will receive from the third-party provider all personal information provided by the donor, with the exception of credit card data, via secure portal. This information is uploaded into the St-Boniface Hospital Foundation donor database for donor stewardship purposes. Only approved staff members have access to the donor portal.

More information on the Foundation's IT systems safeguarding activities may be accessed through the IT Systems Critical Information Safeguarding Policy.

#### REFERENCES

- 1. Personal Information Protection and Electronic Documents Act (PIPEDA)
- 2. Payment Card Industry (PCI) Security Standards
- 3. IT Systems Critical Information Safeguarding Policy

#### FOR MORE INFORMATION

For any of the above documents or for more information, please contact the Foundation Privacy Officer at 204-237-2067.

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