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| Hôpital St-Boniface Hospital<br>FONDATION • FOUNDATION<br><br>**POLICIES & PROCEDURES** | **Policy Name**<br>Privacy Policy<br><br>**Approved by:**<br>St. Boniface Hospital Foundation Board of Directors<br>**Effective Date:** March 26, 2021<br>**Date of Next Review:** March 2024 |

## PURPOSE

St. Boniface Hospital Foundation (the "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 set out the privacy practices of the Foundation regarding the handling, protection, maintenance and administration of personal information collected by the Foundation in the course of its work.

## DEFINITIONS

**Collection** means the act of gathering, acquiring, recording, or obtaining personal information from any source.

**Consent** means voluntary agreement with the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided directly by the person disclosing the information. Express consent can be given orally, electronically or in writing. Implied consent can reasonably be inferred when a person discloses personal information that is then used for purposes that are determined and recorded at the time of collection.

**Disclosure** means making personal information available to a third party.

**Electronic communications** means the electronic activities engaged in by the Foundation such as electronic publications, newsletters, blogs, and/or such other modes of communication adopted by the Foundation from time to time.

**Personal information** is any information that can be used to identify, distinguish, or contact a specific individual. This includes an individual's name, address, birth date, email address and phone number. Personal information can include facts about, or relate to, an individual, as well as an individual's opinions or beliefs. For the purposes of this Privacy Policy, business contact information provided to the Foundation by its suppliers and contractors is not considered to be personal information.

**Third party** means an individual other than a person that has provided personal information to the Foundation (volunteer, donor, potential supporter or other stakeholder) or an organization outside the Foundation.

**Use** means the treatment, handling and management of personal information by an individual within the Foundation.

**Personal Information Protection and Electronic Documents Act (2004) (PIPEDA)** 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 Foundation collects and uses personal information. The Foundation will only use personal information for the purposes for which it was collected. The Foundation adheres to the privacy principles in 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, and may include a person's name, title, address, telephone number, e-mail address if any, past donations, and other relevant contact information. Certain 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.

Employees 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 for which it was collected. Personal information will only be disclosed with the consent of the person that disclosed the information or in circumstances where the Foundation is required to disclose the information by law. In the event the Foundation wishes to use personal information for a new purpose it will seek a new Consent. The Foundation does not rent, sell, or trade mailing lists or other personal information.

Credit card information from donors, lottery ticket buyers, or other stakeholders is not kept on file by the Foundation. Any written records are destroyed, and all Foundation staff must review and sign a form annually to confirm that they are following the Payment Card Industry (PCI) security standards in the handling of credit card information.

**Complaints:** The Foundation will promptly investigate all complaints concerning compliance with the Privacy Policy and our dealings with personal information. If a complaint is found to be justified, the Foundation will take appropriate measures to resolve the complaint, including, if necessary, amending the Foundation's policies and procedures. The Privacy Officer for the Foundation is the Vice-President, Finance & Administration.

**Consent:** Consent to the collection, use and disclosure of personal information by the Foundation may be withdrawn at any time. It is understood that a withdrawal of consent shall not affect any existing obligations or past activities where the Foundation had relied on a consent.

**Website and Electronic Commerce:** The Foundation has adopted privacy safeguard measures in order to prevent unauthorized access, disclosure, use, modification or destruction of personal information under its control. However, it is acknowledged by persons disclosing information to the Foundation that, notwithstanding any reasonable safeguard measures that the Foundation may take, the provision of information through online means may carry an inherent risk.

The Foundation accepts donations online using a secure third-party payment gateway provider which it requires to apply the highest standards for protection of personal data. The Foundation adheres to and annually validates compliance with the Payment Card Industry (PCI) security standards.

To issue charitable tax receipts, the 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 Foundation donor database for donor stewardship purposes. Only approved staff members have access to the donor portal.

**Third Party Vendors:** The Foundation holds all third party vendors to the highest standards for personal data protection.

**Data Retention:** The Foundation limits the collection, use, and disclosure of personal information as outlined under PIPEDA. To make record retention as easy as possible, the Foundation recommends retaining records for a period of seven years. In some instances, such as the collection of credit card information, record retention requirements will vary. After a period of seven years, records may be archived or destroyed. Paper documents must be shredded, and electronic files must be permanently and thoroughly deleted from all online and offline storage using existing digital shredding techniques to prevent data reconstruction. This policy applies to both electronic and paper records, and applies to records related to Governance, Finance, Human Resources, Volunteer Management, Research, Fundraising, and Marketing and Communications.

**Breach of Data:** The Foundation recognizes that data breaches may occur because of the failure of hardware or software, failed internal processes that might affect our ability to manage and sustain cybersecurity, external events such as natural disasters or service dependencies on external providers, or deliberate action taken against IT systems such as cyber-attack, or accidental actions that could result in a breach of our Privacy Policy. Information about the type of breach, how the breach was discovered, the timeline of the data breach, and what data was comprised will be gathered, and notification will be sent to anyone who may be affected by the data breach. The timeline of notification will be determined upon discovery of the data breach. More information on the Foundation's IT systems safeguarding activities may be accessed through the **IT Systems Critical Information Safeguarding Policy.**