

Standard A13: Foundation's Privacy Policy

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Key Contact Regarding Policy:	Executive Director

Definitions:

Need to Know - Within this policy need to know is defined as the requirements of an individual or committee to have personal information of donors depending on their responsibilities assigned with the discretion of the Executive Director. This includes members of the Foundation staff, fundraising committee and /or volunteers carrying out fundraising activities.

Personal Information - Information about an identifiable individual, including name, civic address, phone number and other contact information.

Stakeholders - Stakeholders of the foundation may include an individual or groups (internal or external) which have an interest in the fulfillments of the foundation's mission. Foundation defines its stakeholders as employees, volunteers, donors and members of the Board of Directors

Privacy Policy: The following Cobequid Health Centre Foundation's (CHCF) policy outlines the procedure followed by the Foundation, to keep the information regarding donors, staff, volunteers and all other stakeholders collected completely confidential. It also outlines that all the information collected by the Foundation is used for the sole purpose for which it was collected.

The Foundation values the trust of all its stakeholders and recognizes that to maintain this trust, the Foundation must be transparent and accountable for its use of information collected from the Foundation's Donors. This policy meets all legislative requirements with respect to privacy and applies to all employees, volunteers, and members of the Board of Directors of the Foundation.

Distribution: Cobequid Health Centre Foundation Board, Staff, Volunteers and all other Stakeholders. The policy is available to the public on the Cobequid Health Centre Foundation's website, an individual keen on knowing more about the foundation's privacy policy can also request the Foundation's office for the same.

Guiding Principles and Background: The objective of this policy is to add clarity to the management of all the information that the Foundation collects, whether from donors, volunteers, or other stakeholders. The Cobequid Health Centre Foundation Board of Directors and Executive Director recognizes the need to share donor/staff/volunteer information within the organization for a defined purpose.

It should be noted that Cobequid Health Centre Foundation values its stakeholders and safe guards personal information entrusted to it. The Foundation does not share, trade, lend or sell donor lists or any information with any other organization.

The Foundation adheres to the guidelines of the **Donor Bill of Rights** which commits to the handling of personal information with respect and confidentiality. The foundation also recognizes that in limited circumstances it must ensure such protection which is up to the standards of the **Personal Information and Electronic Documents Act (PIPEDA)**.

This policy also permits the sharing of donor names and giving history with Cobequid Health Centre Foundation Staff, Board Committees, Volunteers who are either members of fundraising committees and/or have a demonstrated "need to know" as part of their assigned responsibilities.

As a norm, only lists of names, addresses and broad donor categories will be circulated to general committee members. This information will be similar to the data which is available broadly though donor recognition, but may include donors who have not been included on the donor wall.

Detailed donor history and information may be given to fundraising team members who are preparing to approach a prospective donor to request a donation.

All donor list information will be circulated in hard copy only and will be clearly marked *Confidential Property of the Cobequid Health Centre Foundation*. Electronic copies of donor data will be provided for exceptional circumstances only by the approval of the Executive Director.

Lists will be returned to the Executive Director of the Cobequid Health Centre Foundation for proper disposal when the need for the information has ceased.

Procedure:

1. Accountability for Personal Information:

Every time an individual makes a donation to the Foundation or participates in a program or an event his/her information gets recorded in the Foundation's secure database and hence becomes a part of the Foundation. However, all the public records or information included in telephone directories (names, emails, telephone numbers, and addresses) which are not considered personal, may be used to acquire support of these potential donors.

2. Identifying Purposes for the Collection of Personal Information:

The information collected at the time of donations is recorded for the following purposes:

- 2.1 To comply with Canada Revenue Agency requirements
- 2.2 To provide donors with periodic stewardship and information
- 2.3 To provide donor recognition by the Foundation
- 2.4 To provide donors with information about future activities of the Foundation
- 2.5 To promote opportunities where the donors and potential supporters may support the foundation's campaigns

The Information collected at the time of volunteering is collected for the following purposes:

- 2.6 To provide potential volunteers with information about CHCF events and activities
- 2.7 To promote opportunities where potential volunteers may support the Foundation
- 2.8 To comply with event/program insurance.

3. Limiting Collection of Personal Information:

The Cobequid Health Centre Foundation collects limited information about its donors, volunteers and stakeholders. The nature of information is only limited to the purpose of which it is identified by the Foundation as necessary at the time of collection. All the information is collected by fair and lawful means, by the consent of the interested person. **The foundation does not collect any health information,**

apart from that of our volunteers which may be involved in activities during events and campaigns. All the personal information after collection is moved to the Foundation's secure donor database.

4. Consent for the Collection, Use and Disclosure of Personal Information:

The Foundation will not seek an individual's consent to collect, use or disclose the personal information beyond that required by the law.

For Example: In obtaining the consent, the reasonable expectations of an individual (interested person) are considered relevant. It is safe for the foundation to assume that an individual's donation constitutes the consent for specific purpose, such as the issuance of an income tax receipt. However, it is understandable that the individual (interested person) would not be in agreement if the personal information would be given to another fundraising organization.

The Foundation's form of consent may vary according to the circumstances and the nature of the information collected. Sensitivity of the personal information is considered as the guiding factor in determining the form of consent. If the information is sensitive, implied consent will be considered to be more appropriate. An authorized representative such as a substitute decision maker, a parent, legal guardian or a person who has the power of attorney can also give consent on behalf of the interested person.

Note: In special circumstances, the information can be collected, used, disclosed without the knowledge or consent of the interested person. For example, legal or security reasons may make it impractical to seek consent. Any information which is collected/used for the purpose of prevention/detection of fraud or for law enforcement, seeking the consent of the individual might defeat the purpose of collecting the information.

In addition if the foundation does not have a direct relationship with the individual it might be impossible to seek consent.

The Foundation uses periodic emails, postcards and other print materials to communicate with its stakeholders, if an individual does not want to receive any such information, he/she may notify the foundation or in the case of electronic communication unsubscribe from our emails.

If an individual requests to limit or withdraw his consent for the use of personal information, the foundation will make sure that the future contact is either limited or discontinued according to the request of that individual.

5. Limiting Use, Disclosure and Retention of Personal Information:

Personal information collected by the Foundation will not be used for any other purposes other than those for which it was collected, except with the consent or by the requirement of the law. The duration for which the personal information is retained will depend on the time required to complete those objectives.

If the Foundation wants to use the personal information for a different purpose, it shall do so by notifying the individual (interested person) in a documented form and it must seek the individual's consent for the same.

The Foundation has developed guidelines and procedures for storing and retention of personal information, the Foundation is also bounded by legislative guidelines and hence all the information is stored for a minimum of 7 years. The Foundation respects all requests of anonymity and thus, further limits disclosure in such situations.

6. Accuracy of Personal Information:

Personal information collected by the Foundation will be kept accurate, up-to-date as it is necessary for the purpose for which it is to be used/or disclosed.

The extent to which the personal information will be kept accurate, complete, and up- to-date will depend upon the use/disclosure of the personal information, taking into consideration the interest of the individual. The personal information will be accurate, complete and up-to-date to minimize the possibility of errors.

The Foundation will not be responsible to routinely update Personal Information, unless such a process is required for the purpose for which the information was collected, or unless the individual (interested person) requests a change himself/herself.

7. Protection of Personal Information:

The CHCF takes all the protective measures to protect and safeguard data from loss, misuse, unauthorized access, disclosure, alteration or destruction.

Personal information of the donors (including title, name, address, telephone number, email address, giving history) is stored in a password protected database and manual filing system, behind the locked offices of Cobequid Health Centre Foundation. Further, access is limited to a “need to know basis”.

All staff members agree to a confidentiality clause at the time of signing their employment contract. Volunteers/ Board of Directors requiring access to our donor database must sign a volunteer confidentiality agreement.

8. Reviewing the Policies and Practices:

The Foundation makes it a point to update its privacy policy every 3 years (or sooner, if needed). The CHCF website will contain the most accurate, up-to-date information regarding its practices and policies.

9. Individual's Access to one's own Personal Information:

Upon request, individuals may request to know their own personal information, they may access personal information any time to make sure that it is accurate, up-to-date and may edit the information if so desired.

Note: In certain situation an individual may be denied to access their own personal information, in such cases the individual will be provided with a reason upon request. The reason for denying may include but not limited to:

9.1 Prohibited or costly to provide

9.2 Information may include references to, or personal information of other individuals

9.3 Information that cannot be disclosed about legal reasons.

10. Managing Compliance:

The foundation makes it a point to abide by its Privacy Policy. If an individual has concerns, questions or complaints regarding the policy, he/she may contact the Executive Director of the foundation. The complaints will be dealt with in compliance to the Foundation's Complaints Policy.

Related Documents: None