

Moose Jaw Health Foundation Privacy Policy

The Moose Jaw Health Foundation (MJHF) recognizes the value of its relationships with donors, volunteers and supporters, and is committed to respecting and protecting their personal information. We value the trust of those we deal with, and of the public, and recognize that maintaining this trust requires transparency and accountability in our treatment of the information that is entrusted to us. Accordingly, the Foundation complies with the federal Personal Information Protection and Electronic Documents Act (PIPEDA), and embraces ethical guidelines established by the Association of Fundraising Professionals, the Association of Healthcare Philanthropy and Canadian Centre for Philanthropy.

The MJHF Privacy Policy serves to outline the rules for the collection, use, disclosure and retention of personal information. The Policy is based on ten (10) internationally recognized privacy principles as outlined in the Canadian Standards Association Model Code ("CSMAMC") for the Protection of Personal Information. To supplement the CSMAMC, the Foundation has created additional policy in regards to online security.

The Moose Jaw Health Foundation is the official charitable organization of the Moose Jaw Union Hospital, but does not share donor information or request patient information from the Five Hills Health Region.

Policy

Principle 1 - Accountability

An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.

1.1 Accountability for the MJHF's compliance with privacy legislation rests with the Executive Director, who has been designated as the Foundation's Privacy Officer.

1.2 We are responsible for personal information in our possession, including information that has been transferred to a third party for processing. In cases where such transfers take place we ensure that the third party has comparable privacy safeguards in place.

Principle 2 - Identifying Purposes

The purposes for which personal information is collected shall be identified by the MJHF when or before the information is collected.

2.1 The purposes will be limited to those which are related to our business and which a reasonable person would consider to be appropriate in the circumstances. We collect personal information concerning our donors for the following reasons:

- To comply with Canada Revenue Agency (CRA) requirements for gift processing

- To thank and publicly recognize donors
- To provide donors with information about how donated funds are used by the hospital
- To keep donors informed about the Foundation's activities
- To promote opportunities for donors and potential donors to support the Foundation.
- To build and maintain relationships

The MJHF will specify the identified purposes, orally or in writing, to the individual from whom personal information is being collected either at the time of collection or after collection but prior to use or disclosure. We will state the identified purposes in such a manner that an individual can reasonably understand how the information will be used or disclosed.

Principle 3 - Consent

The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except where inappropriate. The manner in which the MJHF obtains consent for the collection of personal information varies with the sensitivity of the information being collected. Because of the nature of the information we collect, in most cases we will obtain implied consent at the time of collection.

The principle requires "knowledge and consent", and the MJHF will make a reasonable effort to ensure that individuals are aware of the purposes for which information the information is collected at the time of collection.

Individuals can give consent:

- (a) in writing, such as when completing a donation or registration form.
- (b) through an opt-out process, either by checking off a box on a response form or by contacting the Foundation.
- (c) orally, either in person or by telephone. Individuals may withdraw consent at any time, by any means, with reasonable notice to the Foundation.

The MJHF may collect, use and disclose personal information without consent if that information is considered by law to be in the public domain. Sources of public information include telephone and professional directories, newspapers, periodicals and public registries.

Principle 4 - Limiting Collection

The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means. The MJHF will not collect information indiscriminately. The Foundation will specify the types of information collected, limited to that which is necessary and reasonable to fulfill the purposes identified. The Foundation will collect personal information by lawful means and will not mislead individuals about the purposes for which information is being collected.

Principle 5 - Limiting Use, Disclosure and Retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall

be retained only as long as necessary for the fulfillment of those purposes.

5.1 When the Foundation uses personal information for purposes other than those given at the time of collection, consent will be obtained for these purposes.

5.2 The Foundation does not sell, rent or trade mailing lists. Personal information is only disclosed to third parties who have signed an agreement binding them to the Foundation's privacy policies.

5.3 Personal information will be retained as long as the purpose for which the information was originally collected remains valid.

Principle 6 – Accuracy

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

6.1 The MJHF will use its best efforts to ensure that information that is used on an ongoing basis, including information that is disclosed to third parties, and information that is used to make a decision about an individual (such as a giving recognition category), is accurate, complete and up to date.

Principle 7 – Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

7.1 The MJHF's safeguards will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which the information is held.

7.2 We will make our employees aware of the importance of maintaining the confidentiality of personal information, and we will exercise care in the disposal and destruction of personal information to prevent unauthorized parties from gaining access to it. All employees and volunteers having access to personal information are required to sign an oath of confidentiality.

7.3 Our methods of protection will include physical measures (e.g. restricted access to offices), organizational measures (e.g. security clearances and limiting access on a "need-to-know" basis) and technological measures (e.g. the use of passwords and encryption).

7.4 Third parties are expected to safeguard personal information entrusted to them in a manner consistent with the policies of the MJHF, and are required to sign a confidentiality agreement as part of all contracts. Examples of third parties include mailing services and data analysis providers.

Principle 8 – Openness

An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

8.1 The MJHF will be open about privacy policies and procedures with respect to the management of personal information and will make them readily available in a form that is generally understandable.

8.2 The information made available will include:

- (a) the name or title and contact information of the Privacy Officer who is accountable for compliance with the MJHF's policies and procedures, and to whom complaints or inquiries can be forwarded;
- (b) the means of gaining access to personal information held by the Foundation;
- (c) a description of the types of personal information held by the Foundation;
- (d) a copy of any document that explains the Foundation's policies, procedures, standards or codes; and
- (e) the types of information made available to third parties.

Principle 9 - Individual Access

Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

9.1 The MJHF will respond to an individual's request within a reasonable length of time, but no longer than one month.

9.2 The requested information will be made available in a form that is generally understandable. For example, where the Foundation uses abbreviations or codes to record information, an explanation of those codes will be provided.

9.3 For the Foundation to provide an account of the existence, use and disclosure of personal information, an individual may be asked to provide additional information to aid in the search. The additional information provided will only be used for this purpose.

9.4 Upon request, the Foundation will provide specific information about third parties to whom personal information has been disclosed.

9.5 When an individual successfully demonstrates the inaccuracy or incompleteness of personal information, the Foundation will amend the information as required. Where appropriate, the amended information will be transmitted to third parties having access to the information in question.

Principle 10 - Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.

10.1 The name of the Privacy Officer will be known to staff. Information on how to contact the Privacy Officer will be identified to other individuals periodically.

10.2 The Foundation will maintain procedures to receive and respond to complaints or inquiries about its policies and practices relating to the handling of personal information. The complaint procedures will be easily accessible and simple to use.

10.3 Individuals who make inquiries or lodge complaints will be informed by the Foundation of the existence of relevant complaint procedures.

10.4 If a complaint is found to be justified, the Foundation will take appropriate measures, including revision of the personal information and, if necessary, amendment of the Foundation's policies and practices.

Principal 11 - Web Site Online Security

We have created this additional statement to demonstrate our firm commitment to your privacy. We do not collect personally identifying information about you when you visit our site, unless you choose to provide such information to us. Providing such information is strictly voluntary. This policy is your guide to how we will handle information we learn about you from your visit to our Web site.

11.1 Use of Links

Throughout our Web pages, we provide links to other servers which may contain information of interest to our readers. We take no responsibility for, and exercise no control over, the organizations, views, or accuracy of the information contained on other servers. Creating a text link from your Web site to our site does not require permission. If you have a link you'd like us to consider adding to our Web site, please send an email to kmcelree@fhhr.ca with the subject "Link request."

11.2 Use of Text and Images

If you would like to publish information that you find on our website, please send your request to kmcelree@fhhr.ca. Where text or images are posted on our site with the permission of the original copyright holder, a copyright statement appears at the bottom of the page. Information about using our logo and images is available in Media Resources.

11.3 Accessibility

This website is designed to be accessible to visitors with disabilities, and to comply with federal guidelines concerning accessibility. We welcome your comments. If you have suggestions on how to make the site more accessible, please contact us at kmcelree@fhhr.ca.

11.4 Reading or Downloading

We collect and store only the following information about you: the name of the domain from which you access the Internet (for example, facebook.com), the date and time you access our site, and the Internet address of the Web site from which you linked to our site. We use the information we

collect to measure the number of visitors to the different sections of our site, and to help us make our site more useful to visitors.

11.5 Online Profile Updates and Donations

If you complete the Profile update form and share your personally identifying information, this information will be used only to provide you with more targeted content. We may use your contact information to send further information about our organization or to contact you when necessary. You may always opt-out of receiving future mailings; see the "Opt Out" section below.

11.6 Sending us an Email

You also may decide to send us personally identifying information, for example, in an electronic mail message containing a question or comment, or by filling out a Web form that provides us this information. We use personally identifying information from email primarily to respond to your requests. We may forward your email to other employees who are better able to answer your questions. We may also use your email to contact you in the future about our programs that may be of interest.

We want to be very clear: We will not obtain personally identifying information about you when you visit our site, unless you choose to provide such information to us. Providing such information is strictly voluntary. Except as might be required by law, we do not share any information we receive with any outside parties.

If you sign up for one of our email lists, we will only send you the kinds of information you have requested. We won't share your name or email address with any outside parties.

11.7 Kids and Privacy

For children who visit our site, special rules apply. We do not request personal information about children, such as first and last name or street address and city. When kids send email to us, their online contact information (email address) is not used to re-contact them and is not maintained in retrievable form.

11.8 Opt-Out or Change Your Contact Information

Our site provides users the opportunity to opt-out of receiving communications from us through a special online form. You may choose to receive only specific communications or none at all. You may also update your contact information previously provided to us through another online form. You cannot remove yourself from our database, but you can prevent unwanted communication.

Updating of Privacy Policy

The MJHF will periodically review and update our privacy policy. Please reference this web site for our most current privacy practices.

How to contact the Privacy Officer

Inquiries, complaints or access requests should be addressed to: Privacy Officer, Moose Jaw Health Foundation, 455 Fairford St. E., Moose Jaw, SK S6H 1H3 E-mail: kmcelree@fhhr.ca or by calling 306-694-0255.