

CATEGORY: Board of Directors	NUMBER: 1-BO-CO-2
SUBJECT: Privacy Policy	ISSUED: April 25, 2007
AUTHORIZATION BY: Board of Directors	LAST REVISED: October 2024

Holland Bloorview Kids Rehabilitation Hospital Foundation

Privacy Policy

Holland Bloorview Kids Rehabilitation Hospital Foundation (“the Foundation” “we” or “us”) is committed to protecting the privacy of our stakeholders (including employees, donors, and other individuals). We value our stakeholders’ trust in our mission and management and we recognize that we must be open and accountable in our treatment of the information we hold and receive.

This policy outlines the principles and guidelines related to the collection, use, disclosure, and retention of Personal Information. The policy is based on the 10 fair information principles under Personal Information Protection and Electronic Documents Act (PIPEDA). We also commit to following Canada’s Anti-Spam Legislation (CASL).

From time to time, we may make changes to this Privacy Policy. The Privacy Policy is current as of the “last revised” date which appears at the top of this page. We will treat Personal Information in a manner consistent with the Privacy Policy under which it was collected, unless we have consent to treat it differently. This Privacy Policy applies to any information we collect or receive from any source.

The following topics will be covered in this Privacy Policy:

1. Accountability for Personal Information
2. Identifying Purposes for the collection of Personal Information
3. Consent for the Collection, Use or Disclosure of Personal Information
4. Limiting Collection
5. Limited Use, Disclosure and Retention of Personal Information
6. Ensuring Accuracy of Personal Information
7. Ensuring Safeguards for Personal Information
8. Openness about Personal Information Policies and Practices
9. Individual Access to Personal Information
10. Challenging Compliance

1) Accountability for Personal Information

We are proud to demonstrate our commitment to the privacy of our stakeholders, by complying with the laws and regulations under, and principles of, applicable privacy laws in Canada.

The Foundation has a Privacy Officer who is accountable for the Foundation’s overall compliance with its Privacy Policy and acts as the primary contact person on information privacy and security

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matters. If you have any questions about this Privacy Policy, please contact the Privacy Officer at foundation.privacy@hollandbloorview.ca.

The Foundation will notify individuals impacted by a breach where there is real risk of significant harm.

Holland Bloorview Kids Rehabilitation Hospital Foundation is not responsible for the content or the privacy policies of the websites to which we link.

“Personal Information” means any data about an identifiable person, such as name, contact information, and amount of donation, but does not include the information of corporate entities, or certain publicly available information such as names, addresses, and telephone numbers that are listed in a directory that is available to the public.

2) Identifying Purposes for the Collection of Personal Information

We identify the purposes for which we use Personal Information at the time we collect such information from individuals and obtain their consent, in any case, prior to such use. We generally use Personal Information for the following purposes (the **“Purposes”**):

- a) the administration of donations;
- b) communicating or marketing information about the activities of the Foundation and Holland Bloorview Kids Rehabilitation Hospital through channels such as social media, email, mail, phone call, or text message;
- c) to ask for support in our mission to improve the lives of children and youth having disabilities and their families;
- d) for such other uses of Personal Information for which consent is provided; and
- e) as otherwise permitted or required by law.

3) Consent for the Collection, Use or Disclosure of Personal Information

We obtain consent prior to collecting, and in any case, prior to using or disclosing Personal Information for any purpose. Consent may be expressed orally, electronically or in writing, or may be implied (such as by making a donation, or registering for an event), and you may provide it to us or a third party acting on our behalf. An individual may limit or opt-out of future contact from the Foundation by contacting us at 416.424.3809, or foundation.privacy@hollandbloorview.ca.

4) Limiting Collection

The Foundation will limit the collection of personal information to that which is necessary for the purposes identified. We will always collect Personal Information by fair and lawful means, usually as provided by an individual when requesting information or making a donation, whether through the mail, online, via telephone, or in person.

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Information we collect automatically: technologies such as cookies, web beacons are used on our website. We use Cookies to remember users’ settings as well as for authentication and analytics to allow for a better user experience and allow us to better communicate with, or advertise to our users. These technologies may be used in analyzing trends, administering the website, tracking users’ movements around the website and to gather demographic information about our user base as a whole. You can control the use of Cookies at the individual browser level, but if you choose to disable Cookies, it may limit your use of certain features or functions on our website or service.

5) Limited Use, Disclosure and Retention of Personal Information

We may keep a record of Personal Information, correspondence or comments in a file specific to an individual stakeholder. We will utilize, disclose or retain this Personal Information for as long as necessary to fulfill the purposes for which that Personal Information was collected and as permitted or required by law.

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the person or as required by law. **The Foundation does not trade, rent or sell any personal information to third parties.** Where we choose to have certain services (such as website support, or data management) performed by third party providers, we have contractual agreements that include appropriate privacy standards.

Pertaining to Artificial Intelligence (AI), the Foundation has a separate Artificial Intelligence Usage Policy that outlines in detail that no sensitive and personal data is entered into generative chat AI systems like Chat GPT. This can include but not limited to donor, volunteer, client, or staff information.

Some of our service providers are located outside of Canada (such as payment processing services). As a result, unless there is a legal or regulatory requirement to keep such information in Canada, your Personal Information may be stored or processed outside of Canada and your Personal Information may be accessible to law enforcement and/or regulatory authorities in accordance with the laws of these jurisdictions.

Online donations made on the Foundation’s web pages are processed through secure third parties. The personal and credit card information provided on the online donation form is used only to process the donation. The security and privacy policy and cookies policy of these third parties are available by clicking on the “Privacy Policy” link on the online donation web page, or website footer.

6) Ensuring Accuracy of Personal Information

We will ensure that Personal Information is kept as accurate, complete and up-to-date as possible. We will not routinely update Personal Information, unless such a process is necessary. To change or modify any personal information previously provided to the Foundation, write to the Privacy Officer at foundation.privacy@hollandbloorview.ca.

At any time, a stakeholder can challenge the accuracy or completeness of their Personal Information in our records. If you successfully demonstrate that your Personal Information in our records is inaccurate or incomplete, we will amend the Personal Information as required.

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7) Ensuring Safeguards for Personal Information

We have implemented physical, organizational, contractual and technological security measures to protect Personal Information from loss or theft, unauthorized access, disclosure, copying, use or modification, including:

- a) internal data security policy and procedures;
- b) requirement for all Foundation employees to sign a Confidentiality Agreement;
- c) that the only employees who are granted access to your Personal Information are those with a business ‘need-to-know’ or whose duties reasonably require such information;
- d) premises security;
- e) deployment of technological safeguards such as security software and fire walls to prevent hacking or unauthorized computer access; and
- f) ensuring third parties that are retained to perform services on our behalf and are provided with Personal Information observe the intent of this Privacy Policy.

8) Openness about Personal Information Policies and Practices

The Foundation makes information available about its policies and practices by posting the Privacy Policy on its website at

<https://foundation.hollandbloorview.ca/about-us/hospital/privacy-information-access>

If you have any questions, or to request a printed version, please contact the Privacy Officer at foundation.privacy@hollandbloorview.ca.

9) Individual Access to Personal Information

If you make a written request to review any Personal Information about you that we have collected, utilized or disclosed, we will provide you with any such Personal Information to the extent required by law. We will make such Personal Information available to you in a form that is generally understandable, and will explain any abbreviations or codes.

We will attempt to respond to each written request not later than thirty (30) days after receipt of such requests. We will advise you in writing if we cannot meet your requests within this time limit.

We may request that a stakeholder provide sufficient identification to permit access to the existence, use or disclosure of their own Personal Information. Any such identifying information shall be used only for this purpose.

10) Challenging Compliance

The Foundation is committed to protecting the privacy of its donors. We will respond to all inquiries, concerns or complaints, and take appropriate action.

An individual is able to address a challenge concerning compliance with our Privacy Policy by writing to the Privacy Officer at foundation.privacy@hollandbloorview.ca