

CATEGORY: Board of Directors

NUMBER: 1-BO-CO-2

SUBJECT: Privacy Policy

ISSUED: April 25, 2007

AUTHORIZATION BY: Board of Directors

LAST REVISED: January 28, 2015

## **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 specific principles outlined in the Canadian Standards Association Model Code of Privacy.

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.

“**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) providing information about the activities of the Foundation and Holland Bloorview Kids Rehabilitation Hospital;
- (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. 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](mailto: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.

## 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.

## **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](mailto: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.

## **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 password and security policies;
- 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) causing third parties that are retained to perform services on our behalf and are provided with Personal Information to 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

<http://foundation.hollandbloorview.ca/AboutUs/PrivacyStatement>

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

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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](mailto:foundation.privacy@hollandbloorview.ca).