



West Park Healthcare Centre Foundation Privacy Policy

The West Park Healthcare Centre Foundation is dedicated to supporting patients on the road to recovery by raising funds for programs, patient care, research, education and equipment. We can successfully fundraise only with the support of our friends and community.

If you wish to limit or alter the number or timing of the mailings you receive, please contact us at 416-243-3698 to discuss your preferences. We value all of our supporters and are committed to working with each for their benefit and that of West Park. We do not trade, rent or sell the names of our valued supporters.

If you wish to be removed from our fundraising list(s) at any time, please contact us at 416-243-3698 or email: foundation@westpark.org.

Guiding Principle

West Park Healthcare Centre (WPHC) Foundation is committed to protecting the personal information of all individuals including donors, employees and volunteers. WPHC Foundation values the trust of its donors and recognizes that maintaining this trust requires openness and accountability in handling information that donors choose to share.

Personal information is any information that can be used to distinguish, identify or contact a specific individual. Personal information can include name, home address and telephone number, medical records and marital status. Business contact information and certain publicly available information, such as names, addresses and phone numbers as published in telephone directories are not considered personal information. Where an individual uses his or her home contact information as business contact information it is considered to be business information.

In formulating its approach to the protection of privacy, WPHC Foundation's privacy policy is consistent with the Canadian Standards Association (CSA) Model Code for the Protection of Personal Information – Canada's standard for fair information practice. In addition, WPHC Foundation's complies with applicable provincial and federal privacy laws, guidelines established for charitable organizations and public expectation.

This policy covers all personal information under the control WPHC Foundation, regardless of what medium is used to store, move or copy that data. The following documents each of the 10 CSA principles for fair information practice and WPHC Foundation's practices related to each principle.



Accountability

WPHC Foundation is responsible for the personal information under its control and has designated an individual who is accountable for WPHC Foundation's compliance with its privacy policy. The name and contact information of the designated person, the Privacy Officer, is made available to the public. While the Foundation's Privacy Officer is responsible for the day-to-day operation of WPHC Foundation's Privacy Program, the President of the Foundation oversees WPHC Foundation's overall compliance with this policy.

WPHC Foundation will use contractual or other means to provide a comparable level of protection of personal information that has been transferred to a third party for processing.

In addition, all foundation employees, Board members and volunteers have an individual responsibility to comply with WPHC Foundation's Privacy Policy and to protect the privacy of donors and prospects. Each of these individuals signs a confidentiality agreement and is expected to take responsibility for the following:

- Monitoring and addressing any condition that may threaten the confidentiality or security of personal information;
- Reporting possible problems and improvements to the Privacy Officer;
- Receiving and reporting complaints to the Privacy Officer;
- Helping to solve problems and implement improvements, and
- Keeping up to date on WPHC Foundation policies and related procedures.

Identifying Purpose

WPHC Foundation will, at or before the time of collection, identify the purposes for which personal information is being collected.

Personal information will be collected in a manner that is consistent with the agreed upon purpose and will only be used by those with a need to know in fulfilling the purpose. The primary purpose is to raise funds for West Park Healthcare Centre for research, equipment, education and special initiatives. Information will be collected and used for the following activities:

- To process and receipt donations
- To comply with Canada Revenue Agency requirements
- To respond to requests of donors or potential donors
- To keep our donors and potential supporters informed about activities of West Park Healthcare Centre and WPHC Foundation



- To provide donors with appropriate recognition and periodic stewardship by WPHC Foundation and West Park Healthcare Centre
- To promote opportunities where donors and potential supporters may support WPHC Foundation in its mission to improve the health and well being of its clients and residents

Anyone from whom WPHC Foundation collects personal information can expect that it will be carefully protected and used only for the purposes identified. If personal information that has been collected is to be used for purposes not previously identified, this additional purpose will be identified to the individual before use. Unless the law requires this new purpose, the individual's consent is required.

Consent

The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, unless required by law.

- Consent for WPHC Foundation to use personal information is implied and identified as a purpose of personal information use in the West Park Healthcare Centre Privacy Policy.
- An individual may withdraw consent at any time by contacting WPHC Foundation or completing the opt-out section on donor reply coupons.
- If consent is withdrawn, WPHC Foundation will comply with this request.

Limiting Collection

The collection of personal information will be limited to that which is necessary for the purposes identified by WPHC Foundation. Information will be collected by fair and lawful means.

- Anyone collecting information on behalf of WPHC Foundation should be able to provide an explanation to the individual of the purpose for which the data is being collected.
- WPHC Foundation does not collect personal information indiscriminately. Both the amount and type of personal information collected must be the minimum amount necessary to satisfy that purpose. As much as possible, personal information will be collected directly from the individual.
- Information used in patient mailings is limited to name, mailing address and service.
- WPHC Foundation does not collect personal health information, other than that which has been volunteered directly by the individual. It is the responsibility of the staff or volunteer receiving personal health information from an individual to obtain permission to collect that information.

Limiting Use, Disclosure and Retention

Personal information will 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.

- WPHC Foundation does not sell, rent, trade or otherwise share personal information, including mailing lists.
- WPHC Foundation will not use or disclose personal information if other information can serve the purpose.
- In the process of fulfilling the identified purpose – for which consent has been given – WPHC Foundation may disclose personal information to Board members, volunteers or third party vendors who have a need-to-know in the course of fulfilling the purpose. In each case, the recipient of the personal data has signed a confidentiality agreement with WPHC Foundation, agreeing to hold the information in confidence and use it only for the agreed upon purpose.
- Personal information must be retained long enough to allow the individual access to the information collected for an identified purpose. WPHC Foundation is also subject to legislative requirements with respect to retention periods.
- Personal information will be retained as outlined in the Retention Policy. WPHC Foundation will develop guidelines and implement procedures with respect to the retention of personal information.
- Personal information that is no longer required to fulfill the identified purposes will be destroyed, erased, or made anonymous. WPHC Foundation will develop guidelines and implement procedures to govern the destruction of personal information.

Accuracy of Personal Information

WPHC Foundation will take reasonable steps to ensure personal information will be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.

- Where possible, personal information will be collected directly from the individual.
- Information will be sufficiently accurate, complete and up-to-date to minimize the possibility that inaccurate information may be used to make a decision about an individual.
- Personal information that is used on an ongoing basis will generally be accurate and up-to-date.

Ensuring Safeguards for Personal Information

Security safeguards appropriate to the sensitivity of the information will protect personal information. Access to personal data, regardless of format, will be strictly monitored

with controls appropriate to the sensitivity of the data, in place to prevent against loss, theft, unauthorized access, disclosure and copying of data.

- Staff, Board members, volunteers and third party vendors who may access personal information must sign a confidentiality agreement, prior to being granted access to that data.
- Personal information access will be monitored on an ongoing basis to ensure that actual access conforms to authorized access.
- Care will be used in the disposal or destruction of personal information to prevent unauthorized parties from gaining access to the information.
- Any WPHC Foundation staff or volunteer, who observes a breach of confidentiality, real or potential, should report details to the Foundation Privacy Officer as soon as possible.
- Methods of protection include, but are not limited to the following:

Physical Measures:

- Central Files and other filing cabinets containing personal information are locked when not in use and outside of business hours.
- Access to offices is restricted when staff is not present.
- Documents that contain personal information are shredded when no longer needed.

Technological

- Use of passwords for access to information database.
- Online donations are transferred through a secure, encrypted server.

Organizational

- Access to and disclosure of personal information to staff and volunteers is limited to a need to know basis.
- Privacy practices are defined and staff and volunteers will be trained and updated on policies and procedures.

Openness

WPHC Foundation will make readily available to individuals specific information about its policies and procedures relating to the management of personal information. Personal Information policies and practices will be set out in writing and available to the public. This information will include:

1. Name and contact information for WPHC Foundation's Privacy Officer.
2. How an individual can access his/her WPHC Foundation file.
3. A description of the type of personal information held by WPHC Foundation and a general account of its use.

4. A copy of WPHC Foundation's Privacy Policy and Privacy Statement.

Individual Access

Upon request, an individual will be informed of the existence, use and disclosure of his/her personal information and will be given access to that information. An individual has the right to challenge the accuracy of the information and have it amended as appropriate.

- Each individual has the right to view his/or own records, except if doing so would disclose personal information about another individual.
- WPHC Foundation will respond to a request to view personal information within a reasonable time from when the request is received. The requested information will be made available in a form that is understandable. For example, abbreviations and codes will be explained.
- Staff must properly identify individuals and establish their right to access or correct personal information before information is disclosed. An individual may be required to provide sufficient information to permit WPHC Foundation to provide an account of the existence, use or disclosure of personal information.
- Upon request and after establishing an individual's right to access his/her personal information, WPHC Foundation will inform an individual whether or not it holds personal information about that individual. WPHC Foundation will provide an account of how the individual's information is used.
- It is the duty of the staff member recording the data to ensure the information being stored in records is accurate, not offensive to the prospect or donor and relevant to the cultivation/solicitation process.
- The individual may have his/her record amended, if he/she successfully demonstrates that personal information is inaccurate or incomplete and provided that the original record remains available for reference. Depending on the nature of the information, amendment could involve correcting or adding information to the record.
- Where appropriate, WPHC Foundation will transmit the amended information to third parties with access to the information in question.
- There are certain situations in which WPHC Foundation may not be able to provide access to all the personal information it holds about an individual. Exceptions will be limited and specific, and explained to the individual being denied access. Exceptions may include information that is prohibitively costly to provide, information that contains references to other individuals, information that cannot be disclosed for legal, security or commercial propriety reasons, and information that is subject to solicitor-client or litigation privilege.



Challenging Compliance

An individual will be able to address a challenge concerning compliance with this policy to the Foundation Privacy Officer:

- WPHC Foundation has established a process to address complaints about privacy, confidentiality and/or security of personal information.
- The complaint procedure will be accessible and easy to use. WPHC Foundation will make this procedure known to anyone who lodges a complaint.
- The Foundation Privacy Officer will investigate all complaints. If a complaint is found justified, appropriate measures will be taken.
- Complaints that cannot be resolved by the Foundation Privacy Officer will be referred to the President of WPHC Foundation.
- Individuals have the right to complain to the Information and Privacy Commissioner of Ontario.