



# RVH AUXILIARY PRIVACY POLICY & PROCEDURES

SUBJECT		SUPERCEDES	PAGES
<b>RVH Auxiliary Privacy Policy and Procedures</b>			<b>1 of 8</b>
APPROVAL	RVH Auxiliary President	DATE:	October 21, 2020
AMENDED:	NEW	DATE:	

## **DEFINITION AND SCOPE:**

This policy applies to all activities conducted by the RVH Auxiliary and its representatives that involve the use and/or disclosure of personal information.

## **PURPOSE:**

The purpose of this policy is to ensure that patient, donor and customer information is used solely for the identified purpose, and that all use of personal and confidential information be used only within the approved parameters. This policy explains what information is collected by the RVH Auxiliary, and identifies why this information is collected. It provides explanation for how the RVH Auxiliary uses this information, and how the confidentiality of this information is protected.

## **PRIVACY STATEMENT:**

The Royal Victoria Regional Health Centre Auxiliary (RVH Auxiliary) respects a patient's, donor's and customer's right to privacy. The Auxiliary works hard to ensure that personal information is kept safe and secure throughout the transaction process and otherwise while in our custody. The RVH Auxiliary collects only the information that is necessary to facilitate the collection of a donation and/or process a transaction and for the processing of tax receipts, to process registrations, to communicate relevant news and updates, to provide future opportunities to support the organization or for general fundraising purposes. The RVH Auxiliary does not collect personal health information (PHI). The RVH Auxiliary does not trade, license, rent or sell personal information in any manner.

## **PRIVACY PRINCIPLES:**

- 1. Accountability**  
The RVH Auxiliary is responsible for the personal information in its custody or under its control and has designated our Operations Manager who is accountable for the organization's compliance with the privacy principles and provincial legislation.
- 2. Identifying Purposes**  
The RVH Auxiliary will identify the purposes for which personal information is collected; used and disclosed at or before the time the information is collected.

	POLICY & PROCEDURE SUBJECT	DATE	POLICY #	PAGE
	<b>RVH Auxiliary Privacy Policy and Procedures</b>			2 of 8

**3. Consent for Collection, Use, and Disclosure**

Before, or at the time of collection, the RVH Auxiliary will identify the purposes for which personal information is collected, used disclosed and retained. The knowledge and consent (expressed or implied) of the individual are required for the collection, use, or disclosure of personal information, subject to specific exceptions. (Refer to Appendix B)

**4. Limiting Collection**

The RVH Auxiliary will limit the amount and type of personal information collected to that which is necessary for the purposes identified. The RVH Auxiliary will not collect, use or disclose personal information if other information will serve the purpose of the collection, use or disclosure. Information will be collected by fair and lawful means. (Refer to Appendix B)

**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. (Refer to Appendix B)

**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. An individual may request to have his or her information updated at any time. (Refer to Appendix B)

**7. Safeguards**

Personal information will be protected by security safeguards appropriate to the sensitivity of the information, regardless of the format in which it is stored. (Refer to Appendix B)

**8. Openness**

The RVH Auxiliary will make readily available to individuals specific information about its privacy policies and procedures relating to the management of personal information. (Refer to Appendix B)

**9. Individual Access**

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

**10. Challenging Compliance**

An individual can address a challenge concerning compliance with the above principles, in writing, to the Operations Manager. All complaints will be investigated and action taken when appropriate. (Refer to Appendix B)

	POLICY & PROCEDURE SUBJECT	DATE	POLICY #	PAGE
	<b>RVH Auxiliary Privacy Policy and Procedures</b>			3 of 8

**Guiding Philosophies:**

The RVH Auxiliary observes the following privacy practices:

- The RVH Auxiliary collects information only for strictly specified purposes.
- The RVH Auxiliary only requires that a business or individual provide the necessary amount of personal information to provide a service, conduct business, or facilitate a gift, as required by law or by the Canada Revenue Agency (CRA).
- The RVH Auxiliary may ask for additional information about a business or individual to allow for more personalized information or services, however, the business or individual is not obligated to provide such information.
- Personal information gathered by the RVH Auxiliary is held in the strictest confidence and is protected by industry standard best practices; including physical, electronic and managerial procedures to safeguard and secure the information collected. Additionally, sensitive data such as credit card numbers are encrypted using Secure Sockets Layer (SSL) and other industry standard measures.

	POLICY & PROCEDURE SUBJECT	DATE	POLICY #	PAGE
	<b>RVH Auxiliary Privacy Policy and Procedures</b>			4 of 8

## APPENDIX A

### **DEFINITIONS:**

In the policy,

1. "Personal Information" is defined as any information about an identifiable individual including information that can be used to recognize, identify or contact a specific individual, whether it concerns and email address, where an individual lives, gift information or which interests, causes and organizations he or she supports. Personal information does not include most business contact information such as name, title, business address, or business telephone or fax number of an employee of an organization, and certain publicly available information.
2. "Expressed Consent", means written or verbal consent, unless specified otherwise in the Act. (For example, obtaining a patient's signature or verbal consent, which gives his or her permission for the collection, use or disclosure of personal health information for a specific activity.)
3. "Implied Consent", is consent which is not expressly granted by a person, but rather implicitly granted by a person's actions and the facts and circumstances of a particular situation.
4. "Fundraising" is the process of gathering voluntary contributions of money or other resources, by requesting donations from individuals, businesses, charitable foundations, or governmental agencies.
5. "Commercial Electronic Messages" or CEMs are identified mainly by the purpose of the activity, and whether or not the purpose of the message is to encourage the recipient to participate in commercial activity. When determining whether a purpose is to encourage participation in commercial activity, some parts of the message to look at are:
  - (a) The content of the message
  - (b) Any hyperlinks in the message to website content or a database, and
  - (c) Contact information in the message.

	POLICY & PROCEDURE SUBJECT	DATE	POLICY #	PAGE
	<b>RVH Auxiliary Privacy Policy and Procedures</b>			5 of 8

## APPENDIX B

### **Privacy Principles**

#### **Principle 1: Accountability**

The RVH Auxiliary is responsible for any personal information in its custody, including information that has been disclosed or transferred to an agent on behalf of the Auxiliary, for the purposes of the Auxiliary. It will use contractual or other means to provide comparable level of privacy protection while the information is in an agent's custody.

The RVH Auxiliary will implement policies and procedures to give effect to the principles, including:

- Implementing policies and procedures to protect personal information; including procedures relating to the collection, handling, disclosure, storage and destruction of information;
- Developing information to explain its policies and procedures;
- Establishing policies and procedures to receive and respond to complaints and inquiries; and
- Training and communicating to staff, volunteers and representatives, information with respect to the RVH Auxiliary's privacy policies and procedures.

#### **Principle 2: Identifying Purposes**

- The RVH Auxiliary collects and uses personal information for the following purposes:
  - To process donations
  - To provide tax receipts
  - To administer pre-authorized recurring donations
  - To conduct research and generate statistics
  - To communicate news and updates, charitable promotions and upcoming events, charitable stories, as well as other forms of communications including mail appeals
  - To provide support and help to our donor population
  - To provide high quality interactions with our donor population

#### **Principle 3: Consent for Collection, Use and Disclosure**

Before, or at the time of collection, the RVH Auxiliary will identify the purposes for which personal information is collected, used, disclosed and retained. The RVH Auxiliary collects personal information only for the following purposes:

- To process donations and/or transactions
- To process event related registrations
- To administer to volunteer network
- To ensure donors are kept informed about the programs, services and activities of Royal Victoria Regional Health Centre and the RVH Auxiliary, including the use and impact of their support
- To seek the support of individuals and organizations in carrying out the mission of the Auxiliary.

	POLICY & PROCEDURE SUBJECT	DATE	POLICY #	PAGE
	<b>RVH Auxiliary Privacy Policy and Procedures</b>			6 of 8

Individuals collecting personal information on behalf of the RVH Auxiliary will be able to identify the purposes for which the information is being collected. If personal information is to be used for a purpose not previously identified, the Auxiliary will identify this purpose prior to use and provide individuals with an opportunity to opt-out of this activity.

The knowledge and consent (expressed or implied) of the individual are required for the collection, use, or disclosure of personal information, subject to specific exceptions.

### Electronic Communications

There are three general requirements that the RVH Auxiliary will need to meet to send commercial electronic messages (CEMs), and these are:

1. Consent (express or implied)
2. Identification information
3. An unsubscribe mechanism

These requirements will be met in accordance with relevant Canada Anti-Spam Legislation. While CASL applies to activities of non-profit organizations, there is an exemption under the Governor-in-Council Regulations for CEMs sent by or on behalf of the RVH Auxiliary, as defined under the Income Tax Act, where the primary purpose of the CEMs is to raise funds for the charity. The RVH Auxiliary will only use electronic addresses for the purpose of CEMs when express or implied consent has been received.

The RVH Auxiliary will inform the individual of the foreseeable consequences of withholding or withdrawing consent. The withdrawal of consent is not retroactive.

### **Principle 4: Limiting Collection**

The RVH Auxiliary limits the collection of personal information to that which is reasonably necessary for the identified purpose, and the Auxiliary will only record information by fair and lawful means. The amount and type of information recorded by the Auxiliary will be limited to the minimum amount necessary to satisfy the intended purposes for the information; and as much as possible, personal information will be collected directly from the individual or organization.

### **Principle 5: Limiting Use, Disclosure, and Retention**

Personal information will not be used or disclosed for purposes other than for which it was intended, unless consent has been received by the individual or organization. The RVH Auxiliary will retain personal information only as long as necessary for the fulfillment of those purposes and for legal or business purposes.

- The RVH Auxiliary does not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or organization or as permitted by law.
- The RVH Auxiliary does not disclose personal banking information provided by donors, except to the appropriate banking institutions or payment processing providers in order to complete a payment or gift transaction.
- The RVH Auxiliary may be required to disclose personal information to satisfy a law, regulation or government request, or to satisfy a subpoena, search warrant or legitimate court order.

	POLICY & PROCEDURE SUBJECT	DATE	POLICY #	PAGE
	<b>RVH Auxiliary Privacy Policy and Procedures</b>			7 of 8

- The RVH Auxiliary may need to share personal information with third parties engaged to assist the RVH Auxiliary in carrying out its mission. Such third parties are contractually bound to protect personal information, as noted in “Accountability”.
- The RVH Auxiliary will retain personal information only as long as necessary for the fulfillment of the purposes for which it was collected and for legal or business purposes.
- The RVH Auxiliary will maintain reasonable and systematic controls for information and records retention and destruction.
- The RVH Auxiliary may retain personal information in order to best meet the needs of its relationship with the individual or organization

**Principle 6: Accuracy**

The RVH Auxiliary takes reasonable effort to ensure personal information is accurate, complete and as up to date as is necessary for the purposes that it is being used. Individuals may request amendments to their personal information, as necessary. The Auxiliary may retain the original information as needed, and for reference purposes only.

**Principle 7: Safeguards**

- The RVH Auxiliary ensures reasonable efforts to protect personal information from loss, theft, unauthorized access, copying, use, modifications, disclosure and destruction by establishing and maintaining appropriate security safeguards appropriate to the sensitivity level of the information.
- RVH Auxiliary staff and its representatives are governed by a strict code of conduct, and adhere to strict privacy and confidentiality expectations.
- Gifts, registrations and transactions processed through any of their contracted payment systems adhere to Payment Card Industry Data Security Standards (PCI DSS) and uses the facilities of a PCI DSS compliant payment processor to securely store payment card details. All contract payment systems use Secure Sockets Layer (SSL) technology to help ensure the safety and security of online transactions. SSL technology enables encryption of sensitive information.
- Access to database records is granted to employees and representatives of the RVH Auxiliary only, and security levels are granted based on a need for access.
- Hard files are located in locked filing cabinets in restricted access offices.

**Principle 8: Openness**

The RVH Auxiliary makes information about its policies and practices related to the management of personal information readily available to donor, customers and the general public. Additional information about its privacy policies and practices can be obtained from the Operations Manager as described below.

	POLICY & PROCEDURE SUBJECT	DATE	POLICY #	PAGE
	<b>RVH Auxiliary Privacy Policy and Procedures</b>			8 of 8

### **Principle 9: Individual Access**

Upon request, the RVH Auxiliary will:

1. Inform individuals of the existence and use of their personal information
2. Inform individuals whether their personal information has been disclosed to any authorized third parties
3. Afford individuals a reasonable opportunity to review the personal information in its custody.

Certain exceptions may apply to this access which may include information that contain references to other individuals, and information that cannot be disclosed for legal or security reasons.

Requests for access are to be directed to:

The RVH Auxiliary  
 Attention: Operations Manager  
 201 Georgian Drive  
 Barrie, ON L4M 6M2

Or call: 705.728.9090 x42432  
 Or email: [Auxiliary@rvh.on.ca](mailto:Auxiliary@rvh.on.ca)

### **Principle 10: Challenging Compliance**

Any question, request or concerns regarding the RVH Auxiliary's compliance with respect to the Privacy Policy or about or privacy practices may be directed to the Operations Manager as described above.

All concerns regarding compliance with this policy will be properly discussed, documented and addressed in a timely manner.

Any person accountable for compliance with the RVH Auxiliary's privacy policy may seek external advice where appropriate in order to provide an appropriate response to a concern or complaint. The Auxiliary will investigate all complaints concerning compliance with its privacy policy, and, if a complaint is found to be justified, appropriate measures will be taken, including amending policies and procedures where required. The individual will be informed of the outcome of the investigation regarding their complaint.