



PRIVACY POLICY

Approving Authority: Board of Directors

Effective Date: November 18, 2020

Approval Date: November 18, 2020

Supersedes: July 8, 2014

Last Editorial Change: N/A

Mandated Review: November 2023

PURPOSE

- 1.0 The University Hospitals Kingston Foundation (UHKF), is committed to protecting the privacy of its donors, prospective donors, volunteers and employees. The Foundation values the trust of those it serves and recognizes that that trust is earned by being transparent and accountable in how information collected is treated and protected.

DEFINITIONS

- 2.0 Personal information is any information that can be used to identify, contact or distinguish a specific individual. This information can include an individual's opinions or beliefs, as well as facts about, or related to, the individual. Business information and publicly available information, such as names, addresses and telephone numbers as published in telephone directories, are not considered personal information.

JURISDICTION/SCOPE

- 3.0 This policy applies to all UHKF community members..

POLICY

Privacy Practices

- 4.0 The Foundation collects and uses a limited amount of personal information about donors, potential donors and volunteers including contact information and donations history. This information is only used for the purposes of fundraising, the administration of donations, providing information about the activities of the Foundation and its related Hospitals, providing donors and volunteers with appropriate recognition, to provide donors with updates on the use of their gifts, and to ask for support for the Foundation's and related Hospitals' missions.
- 5.0 The Foundation may also collect information that donors and volunteers provide about their interests and other related facts, to assist them in meeting their philanthropic goals through gifts they make to University Hospitals Kingston Foundation.
- 6.0 Personal information collected by UHKF is kept in confidence and is only disclosed to meet the purposes stated above. Employees, directors, volunteers and agents sign confidentiality agreements and safeguards are in place to ensure that the information is not accessed, disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered.

- 7.0 UHKF uses password protocols to protect personal and other information received electronically. The Foundation's software and protocols are routinely updated to maximize protection of this information.
- 8.0 **UHKF does not sell, rent or trade its mailing lists or other personal information.**
- 9.0 To ensure individual privacy is protected, UHKF is guided by the following 10 principles recommended by the Canadian Standards Association, and the Personal Information Protection and Electronic Documents Act (PIPEDA). The Foundation also adheres to the Association of Fundraising Professionals' *Donor Bill of Rights* and *Code of Ethical Principles & Standards* as well as the Canadian Association of Gift Planners' *Code of Ethics*.
- 9.01 **Accountability:** UHKF is responsible for the personal information it holds and uses for fundraising purposes. The Chief Finance and Administration Officer has been designated the corporate Chief Privacy Officer and is accountable for compliance with the following principles.
- 9.02 **Identifying Purpose:** The Foundation collects, uses and discloses personal information only for the purpose of fundraising, the administration of donations, providing information about the activities of the Foundation and its related Hospitals, compliance with legal and regulatory requirements and to build support around its mission.
- 9.03 **Consent:** Donors and prospective donors are offered numerous privacy options, including the option to limit or opt out of future contact. Discharged patients who do not opt out may receive correspondence from the Foundation's related hospitals, soliciting financial support for the hospital's mission. Patients who choose to contribute to UHKF in response to this solicitation give implied consent for their contact information to be provided to the Foundation. Any donor may opt out of receiving future communications from the Foundation by contacting its offices.
- 9.04 **Limiting Collection:** Employees, volunteers or agents of the Foundation collect information necessary for the purpose of a particular fund raising program or event. The information will only be used for the purpose for which it was gathered. The Foundation does not have access to patients' medical information. Other personal information may be gathered from donors and prospective supporters to assist with facilitating gifts to specific medical programs. Any information collected will be kept only as long as is required to serve the donor's needs.
- 9.05 **Limiting Use, Disclosure and Retention:** Safeguards are in place to ensure that information collected by the Foundation is not accessed, disclosed or shared inappropriately. Information is kept only as long as necessary for the original purpose for which it is collected, or to comply with Canada Revenue Agency and other legal or regulatory guidelines.
- 9.06 **Record Maintenance:** UHKF maintains complete and accurate personal information as necessary for the processing of receipts and the dispersal of fundraising, program or special event materials. Material recording personal information will be destroyed and disposed of in a manner which ensures the security of personal information.

- 9.07 **Safeguarding Personal Information:** UHKF will protect donor information on file by safeguarding access to this information. Only those who need access to the information to process receipting or inquiries or to further the fundraising mission of the Foundation shall be provided with limited access.

File cabinets, office doors, desk drawers and computers that hold personal information are locked when not in use and have security passwords or keys for access so that others cannot browse data bases when Foundation personnel are away from desks or offices.

Personnel of the Foundation agree to conduct their day-to-day business to ensure the confidentiality of each gift, request, inquiry, acknowledgement or recognition event they are involved with.

- 9.08 **Openness:** UHKF will provide donors and the public with the privacy policy upon request. All inquiries should be directed to the Foundation's Chief Privacy Officer.
- 9.09 **Access:** Individuals can request access to their personal information and within 30 days the Foundation will respond to the request. Individuals have the right to ensure the information is accurate and complete and amend the file if necessary.
- 9.10 **Challenging Compliance:** Individuals can address complaints to University Hospitals Kingston Foundation, Chief Privacy Officer, 55 Rideau Street, Suite 4, Kingston, Ontario K7K 2Z8 or call 613-549-5452 or email: foundation@uhkf.ca.

Complaints will be addressed within 60 days; after all involved parties have been interviewed. If a complaint is found to have validity, the process that drove to the complaint, shall be amended by UHKF.