

**CATEGORY:** FOUNDATION  
**POLICY SUBJECT:** PRIVACY (CTCFCK-001)  
**EFFECTIVE DATE:** 2009/01/21

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## **PRINCIPLES**

At the Children's Treatment Centre Foundation of Chatham-Kent, the privacy of the personal information of our donors, prospective donors, employees and other stakeholders is an important aspect to how we conduct our business. The Foundation values the trust of those with whom it deals as well as with the public at large and the Foundation recognizes that maintaining this trust requires that it be open and accountable in how entrusted information is handled. As a result, the Foundation has developed this policy both to ensure compliance with privacy legislation as well as to inform its stakeholders of its continuing commitment to the protection of their personal information.

All Foundation personnel are authorized to access personal information in our files only as required for the conducting of legitimate and appropriate Foundation business. In addition, safeguards shall be instituted to ensure that the information retrieved is not used nor disclosed beyond its immediate requirements.

This policy is based on the Canadian Standards Association Model Code and adheres to the federal Personal Information Protection and Electronic Documents Act (PIPEDA).

## **DEFINITIONS**

"Personal information" includes any factual or subjective information, recorded or not, that could be used to distinguish, identify, or contact an individual. This includes information in any form such as personal e-mail addresses, credit card numbers, home addresses and so on. It does not include the name, title, company, business address, business telephone or fax number of an employee of an organization. Also not deemed to be personal information is certain publicly available data such as names, addresses and telephone numbers as published in telephone directories where the subscriber can refuse to have personal information appear in the directory.

"Foundation" refers to the Children's Treatment Centre Foundation of Chatham-Kent, "Centre" refers to the Children's Treatment Centre of Chatham-Kent, and "Board" refers to the Board of Directors of the Children's Treatment Centre Foundation of Chatham-Kent.

## **PRIVACY PRACTICES**

### **1. Accountability**

The Foundation's Executive Director or other person so designated by the Board serves as the Foundation's Chief Privacy Officer. All employees, trustees and other volunteers of the Foundation are required to comply with the Privacy Policy. At times, Foundation staff may be designated to act on behalf of the Chief Privacy Officer or to take responsibility for occasional collection, use, and/or disclosure of personal information.

### **2. Declaration of Privacy Responsibilities**

All individuals who have or may have access to the Foundation's confidential files are required to sign a Declaration of Privacy Responsibilities confirming their understanding of this policy and their commitment to its adherence.

### **3. Identifying Purposes**

Before, or at the time of the collection of personal data, the Foundation must identify the purposes for which personal information is being collected. Information collected will be used only for the original purpose for which it was collected, unless required otherwise by law.

#### **3.1 The Foundation collects personal information for the following purposes:**

- a) to establish and maintain a responsible relationship with donors;
- b) to register participants at events in support of the Foundation;
- c) for purposes identified to individuals or purposes obvious to individuals, in respect of particular collections of personal information;
- d) to meet legal and regulatory requirements;
- e) to share information about the Centre and Foundation, including but not limited to the Annual Report, event invitations, newsletters, and updates concerning the Centre and its needs; and
- f) to manage and develop the Foundation's operations.

### **4. Consent**

In the collection, use or disclosure of personal information, knowledge and consent of the individual so involved is required. This consent must be meaningful and easily understood. Nonetheless, in certain circumstances, such as an emergency or as required by law, the Foundation may disclose personal information without the interested individual's knowledge or consent.

### **5. Publication of Donor Lists**

With respect to the publication of donor lists by gift category, donor requests for anonymity will be honoured.

### **6. Client and Volunteer Solicitation**

The Foundation may receive contact information of volunteers and clients and their families from the Centre. Formal requests from individuals to be excluded from mailings or other communications will be respected and acted on promptly.

## 7. Limiting Collection

Personal information collected is limited to the purpose for which it was collected, except with the consent of the individual and as permitted by law. Should there be an additional use for which the information may be employed, individuals affected must be notified and their consent obtained.

## 8. Limiting Use, Disclosure and Retention

Personal information will be used only for the purpose for which it was collected except with the consent of the individual or as required by law. The Foundation shall retain personal information only as long as necessary for the fulfillment of those original purposes. When personal information is no longer required for the fulfilling of those purposes it will be permanently erased from the electronic records or shredded if it exists in hard copy.

## 9. Accuracy

The Foundation shall take steps to ensure that personal information is accurate, complete, and as up-to-date as possible. If individuals are aware of changes to personal information that they have given to the Foundation, they can inform the Foundation of the changes and the Foundation will update its records.

## 10. Safeguards

The Foundation shall protect personal information by security safeguards appropriate to the sensitivity of the information and the means by which it is stored.

10.1 The Foundation shall establish appropriate safeguards to protect personal information against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification or destruction. Employees and volunteers of the Foundation shall be made aware of the importance of maintaining the confidentiality of personal information.

10.2 The Foundation shall establish appropriate safeguards to protect personal information disclosed to third parties, for example by contractual agreements stipulating the confidentiality of the information and the purposes for which such information is to be used.

10.3 The Foundation shall not lend, exchange, rent, or sell its donor information to other organizations or individuals.

## 11. Openness

Copies of the Foundation's Privacy Policy shall be made available upon request and shall be available on its website.

## 12. Individual Access

Upon request, an individual will be given access to his or her personal information stored by the Foundation. An individual has the right to challenge the accuracy and completeness of the information and have such information amended if appropriate.

12.1 All requests for access to personal information will be responded to within a reasonable time (not to exceed 30 days) and the Foundation shall attempt to minimize costs to the individual.

12.2 In order to safeguard personal information, an individual requesting access to a personal file will be required to provide sufficient verifying identification. The Foundation shall only permit access to an individual's file once identification has been verified.

12.3 If the information requested contains personal information about another individual, that information must be removed before the request can be honoured.

### 13. Challenging Compliance

An individual may challenge the Foundation's compliance with this policy with the Chief Privacy Officer who will ensure the complaint is addressed within a reasonable period of time. If the person proposing the challenge is not satisfied with the response provided by the Chief Privacy Officer, the Chief Privacy Officer shall bring the complaint to the Executive Committee of the Board for resolution of the dispute.

**Approved by the Board of the Children's Treatment Centre Foundation of Chatham-Kent.**

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President

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Date

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Executive Director

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Date