
FORT ST. JOHN HOSPITAL FOUNDATION
(the "Foundation")

PRIVACY POLICY

1. BACKGROUND:

- a. The Foundation is a registered charity that collects, raises, and distributes funds for the benefit of the Fort St. John Hospital (the "Hospital") and the Peace Villa Facility (the "Villa"). The Foundation needs to collect personal information to fulfill its mandate.

2. PURPOSE:

- a. The Foundation has developed the Privacy Policy for implementation beginning March 1st, 2010. This Policy outlines how the Foundation collects, uses, retains, safeguards, discloses, and disposes of the personal information of current and past donors, prospective donors, and individuals associated with businesses and organizations who have, are, or may in the future be donors as well as individuals other than donors.
- b. The Privacy Policy describes how the Foundation will, subject to applicable legal requirements, adhere to all relevant federal and provincial legislative privacy requirements. The Foundation will strive to meet or exceed federal and provincial legislative requirements and remain current with changing technologies and laws. Any changes will promptly be posted to the Foundation's website and made available through other means upon request.

3. RESPONSIBILITY:

- a. The Foundation will appoint the Executive Director as the ("Privacy Officer"), whose responsibilities will include the implementation and monitoring of the Foundation's Privacy Policy. The Privacy Officer will be responsible for the Foundation's compliance with privacy principles. This person will also be responsible for responding to access requests following this policy. The Privacy Officer will report to the Board of Directors (the "Board"), and the ultimate responsibility for privacy issues will rest with the Board. The Privacy Officer may, at their discretion, enlist assistance from other staff members or volunteers within the organization. This will not, in any manner, mitigate their responsibilities for privacy issues.
- b. The Privacy Officer's identity will be fully disclosed and publicly accessible to the Foundation's members and the public in general.
- c. The Foundation's Privacy Officer will ensure that the Foundation manages all personal information in its possession by this policy, including that which may be transferred to a third party. Third-party organizations who handle data on behalf of the Foundation shall be contractually obligated to adhere to the Foundation's standards.
- d. The Foundation will implement internal policies which will facilitate adherence to this Privacy Policy, including but not limited to the following actions:
 - i. Security measures at all levels are designed to protect personal information in the Foundation's possession;

- ii. Implementing procedures designed to respond to complaints or inquiries; and
 - iii. Staff training in all facets of information management, including awareness of the Foundation's Privacy Policy, guidelines and procedures developed in accordance with it.
4. **IDENTIFYING PURPOSES, TYPE OF INFORMATION COLLECTED, AND THE WEBSITE:**
- a. The Foundation shall only collect personal information deemed reasonably necessary to conduct ongoing charitable work, including but not limited to approaching individuals by mail, telephone, email, or in person regarding donation and recognition possibilities.
 - b. The Foundation collects personal information from donors, prospective donors, publications, and affiliate organizations to fulfill its charitable mandate. Specifically, the data collected is the following:
 - i. A donor or prospective donor's name, marital status, address, telephone number, fax number, email address, donation amount, and donation designation are collected to issue and track numbered tax receipts and record donation histories. Addresses, telephone and fax numbers, and email addresses may refer to a home, a mailbox, or a business;
 - ii. Banking and credit card information may be collected from individuals with express consent to facilitate timely donations or pre-approved payments;
 - iii. Historical information concerning donations to other organizations (if publicized), birth dates, dates of the deceased, past address information, previous names, spousal information, family information, educational information, employment information, past donation history to the Foundation, recognition received for donations, affiliations with businesses and organizations, information on volunteerism, newspaper, and periodical items may be collected to maintain and increase relationships with donors;
 - iv. Information on a donor's parents' names, children's names, addresses, telephone numbers, and email addresses may be collected to facilitate contact information and maintain and increase relationships with donors;
 - v. E-mail addresses, home addresses, business addresses, telephone and facsimile numbers may be collected to facilitate communication-related to upcoming events, programs, and donation possibilities; and
 - vi. Personal information collected for the purposes above may also be used for specific research purposes, including but not necessarily limited to demographic-type research.
 - c. The Foundation has, from time to time, partnership arrangements with for-profit businesses and corporations. The Foundation will only disclose the following information to these partners: name, spouse's name, mailing address, telephone number, last donation date, donation amount (in ranges of **\$100** [one hundred] increments only), and an email address unless otherwise authorized by the individual.
 - d. The Foundation will endeavour to advise donors and potential donors of the purpose for collecting the data requested at the time of collection or by reference to the Foundation's website at www.fsjhospitalfoundation.ca. It will further endeavour to

ensure that all collectors of personal information are familiar with the potential use of personal data. All personal data collected by the Foundation shall be maintained at its office listed on its website or at a secure location approved by the Board.

- e. The Foundation will request individual permission for the use of any personal data collected which is extraneous to that which has been identified above unless said use is authorized by law.
- f. The Foundation may also use information about an individual who accesses secure areas of its website at www.fsjhospitalfoundation.ca or another one that belongs to it. Information requested to be provided during the Foundation's website use may include names, addresses, and email addresses. All such personal information will be treated according to the same principles as other personal data collected by the Foundation through other means. It is always the individual's choice to provide information in specific fields. However, failure to complete certain sections may inhibit the individual's access to all website areas. The Foundation's website also collects non-identifiable information about users, such as the user's IP address, the website sections visited, and the downloaded information. The Foundation may use this non-identifiable information and disclose it to service providers for system administration and to improve the website.

5. **CONSENT:**

- a. The Foundation will use the personal information for the uses specified above in Section 4 and Sections 5.b and 7.a below. By consenting to provide information to the Foundation, individuals are deemed to consent to the information listed in Section 4 of this Privacy Policy and to disclose the information to other associated organizations and third parties for the same purpose.
- b. In addition to using personal information for the above charitable purposes, the Foundation may, from time to time, wish to use the donor's name, address, and contact information to provide promotional opportunities, including information to other third parties that the Foundation believes they provide services or goods that may interest the member. The Foundation and any such third parties may contact members with promotions or give more information and communications updates. The Foundation will allow members to consent to these opportunities during the Foundation's ongoing activities. If a member consents but later wishes to opt out of this use of their information, they may do so by contacting the Foundation as described in Section 5.d below.
- c. The Foundation does not request, collect, or have access to medical records, medical history, or medical forms of individuals collected by the Hospital and the Villa.
- d. If a member wishes to withdraw their consent to use their information for any purposes, they may contact the Privacy Officer of the Foundation. The Privacy Officer will explain to them the impact of their withdrawal on any services the Foundation offers. The Privacy Officer will do their best to accommodate the member's request in a timely fashion without diminishing the services the Foundation provides for them.

- e. The Foundation may collect personal information without consent where it is reasonable to do so and where it is permitted by law.

6. LIMITING COLLECTION:

- a. All information shall be collected fairly and lawfully within the criteria outlined in the Foundation's Privacy Policy.
- b. The Foundation shall not indiscriminately collect information. The amount and type of data it collects shall be limited to what is required to fulfill the Foundation's identified purposes.
- c. The Foundation will not use deception to gain any member's personal information.

7. LIMITING USE, DISCLOSURE, AND RETENTION:

- a. Subject to applicable legislation, the Foundation shall limit the use of personal information it collects for purposes that have been disclosed in Sections 4 (Identifying Purposes) and 5.b (Consent).
- b. The Foundation shall maintain documents for specific periods depending upon necessity. More specifically, the Foundation will do the following:
 - i. The Foundation will generally keep paper records for three years. Electronic records are retained indefinitely.
 - ii. The Foundation may, from time to time, enlist the services of third-party vendors to provide programs, technical support, and support services. Before enlisting the services of these firms, the Foundation will contractually commit them to treat all personal information consistent with the association's Privacy Policy.
 - iii. The Foundation may be involved in the merger, transfer, or reorganization of its activities. It may disclose personal information to the other party in such a transaction. The Foundation will ensure that it contractually obligates the other party to treat this information in a manner consistent with the organization's Privacy Policy.
 - iv. The Foundation may disclose personal information to a government authority that has asserted its lawful authority to obtain the information or where the association has reasonable grounds to believe the information could be helpful in the investigation of an unlawful activity or to comply with a subpoena or warrant or an order made by the court, person, or body with jurisdiction to compel the production of the information or otherwise as permitted by applicable law.
 - v. The Foundation may, at its discretion, release personal information to collect debts that may be owed to it.
- c. Certain documents may be subject to federally or provincially legislated retention periods, and the Foundation will always respect these timelines.

8. ACCURACY:

- a. The Foundation shall strive to ensure, to the extent it can, that the information entrusted to it is maintained accurately. It also will keep the interests of the individual and ensure that decisions are not made for or about an individual based on flawed personal information.
- b. The Foundation may, from time to time, update the information to ensure accuracy.

9. SAFEGUARDS:

- a. Security safeguards have been implemented to protect personal information from theft and unauthorized access, disclosure, copying, use, or modification.
- b. The level of safeguards employed shall be directly related to the level of sensitivity of the personal information collected—the more sensitive the information, the higher the level of security that will be employed.
- c. Methods of protection and safeguards to be employed shall include but are not limited to the following: locked files, offices, and storage areas; security clearances and other need-to-know access words; as well as technological measures such as passwords and encryption.

10. OPENNESS:

- a. The Foundation publicly discloses how it handles personal information. This information is readily available through its Privacy Policy, on the website, or upon request by contacting the organization's Privacy Officer.
- b. The information available includes the following:
 - i. The name, address, and phone number of the Foundation's Executive Director. In the absence of the Executive Director the Board Chair will assume the role of Privacy Officer.
 - ii. One may contact the Foundation office to access or change one's information.
 - iii. A description of the type of personal information held by the Foundation and its general uses thereof (as described in Section 4 and Section 5.b above).

11. INDIVIDUAL ACCESS:

- a. Subject to applicable legislation, upon request by the individual concerned, the Foundation shall disclose whether it holds personal information on an individual. It shall inform the source of this information (if known when requested) and provide an account of third parties to whom the information may have been disclosed.
- b. The Foundation may request sufficient information to confirm someone's identity before releasing any personal information to said person.
- c. Subject to applicable legislation, the Foundation shall endeavour to provide this information within thirty (30) days of receipt of said information and only charge nominal fees for offsetting its expenses in supplying the requested information. This information shall be provided in an understandable format.
- d. Any inaccurate information brought to the Foundation's attention shall be corrected by it as quickly as possible, and any relevant third parties shall be apprised of the corrections in due course.

12. CHALLENGING COMPLIANCE:

- a. The Foundation has procedures for resolving grievances in administering its Privacy Policy.
- b. Upon receipt of a complaint, the Foundation shall make available the complaint procedures, which will be simple and easy to access.
- c. The Foundation shall investigate all complaints. If the complaint is deemed justified, the organization shall take the appropriate steps to ensure compliance and will change its policies for future conformity.
- d. All complaints shall be addressed to the Foundation's Privacy Officer.

13. Policy Review

- a. This policy will be reviewed by the Governance Committee every 3 calendar years to ensure that the policy is reflective of the direction and philosophy of the Foundation. Any changes to this policy must be approved by the Board.

Policy Approved:	October 19, 2010
Policy Revised:	August 22, 2023
Policy Last Reviewed:	August 22, 2023