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**TITLE: PRIVACY POLICY**

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Section: Operations Effective Date: 2007-04-17  
Source: Board of Directors Revision / Affirmation Date:  
Authorization:  Scope: Board of Directors, Staff, Volunteers  
Phyllis Cameron, Chair

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**PREAMBLE:**

The Cumberland Health Care Foundation recognizes its obligation to respect and protect the privacy of our donors and website visitors. All personal information provided online is secure. The Personal Information Protection and Electronic Documents Act is a Federal Act that came into effect January 1, 2004. The Cumberland Health Care Foundation complies with all federal and provincial privacy legislation and adheres to ethical guidelines established by professional fundraising associations. (Canadian Centre for Philanthropy, Canadian Association of Gift Planners, Association of Fundraising Professionals and Association for Healthcare Philanthropy)

The Cumberland Health Care Foundation Privacy Policy serves to outline the rules for collection, use, disclosure and retention of personal information. The Policy is based on ten internationally recognized privacy principles.

**1. Accountability for Personal Information**

- a) The foundation has a Privacy Officer (Managing Director) who is accountable for the Foundation's overall compliance with the Privacy Policy and acts as the primary contact person on information privacy and security matters. The Privacy Officer reports directly to the Chair of the Board of Directors and can be reached at: [info@chcfoundation.com](mailto:info@chcfoundation.com) or by calling the Managing Director at 902-667-5400 ext 6126.
- b) The Privacy Officer will conduct privacy audits and privacy training on a regular basis to ensure that practices conform to the Foundation's Privacy Policy.
- c) A Privacy Impact Assessment is required for the creation of new personal information systems and for significant changes to existing information systems at the Foundation to identify potential risks to privacy.

## **2. Identifying Purposes for the Collection of Personal Information**

- a) When the Foundation collects personal information directly from its constituents, the Foundation will identify the purposes for which personal information is collected at or before the time of collection. These purposes include: donor recruitment, that which is necessary for the administration of a donor's interest and compliance with legal and regulatory requirements.

## **3. Obtaining Consent for the Collection, Use or Disclosure of Personal Information**

- a) The knowledge and consent of a person is required for the direct collection, use or disclosure of personal information except where mandated by law.

## **4. Limiting Collection of Personal Information**

- a) The Foundation will limit the collection of personal information to that which is necessary for the purposes identified. Information will be collected by fair and lawful means. The Foundation does not collect personal health information, other than that which is volunteered directly by the constituent.

## **5. Limiting Use, Disclosure and Retention of Personal Information**

- a) Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the person or as required by law. Personal information will be retained only as long as necessary for the fulfillment of those purposes. The Foundation does not trade, rent or sell any personal information to third parties. The Foundation's web page contains on-line forms that allow visitors to make a donation. The personal and credit card information provided on these forms is used only to process these donations. Online donations to the Foundation are processed through a third party. The security and privacy policies of this third party are available by clicking on the "Security and Privacy Policy" icon on the online donation form.

## **6. Ensuring Accuracy of Personal Information**

- a) The Foundation ensures personal information is accurate, complete and as up-to-date as necessary for the purposes for which it is to be used. To change or modify any personal information previously provided to the Foundation, write to the Privacy Officer c/o the Managing Director, Cumberland Health Care Foundation, 19428 Highway 2, RR 6, Amherst, NS B4H 1N6 or send an email to [info@chcfoundation.com](mailto:info@chcfoundation.com)

## **7. Ensuring safeguards for Personal Information**

- a) Personal information is protected with security safeguards appropriate to the sensitivity of the information. All Foundation employees, directors, volunteers and hired solicitors must sign an Oath of Confidentiality.

## **8. Openness Concerning Policies and Practices**

- a) The Foundation's Privacy Policy is available to view on its website at: [www.chcfoundation.com](http://www.chcfoundation.com) A print version of the Foundation's Privacy Policy can be requested from the Privacy Officer at: Privacy Officer c/o the Managing Director, Cumberland Health Care Foundation, 19428 Highway 2, RR 6, Amherst, NS B4H 1N6, by email to [info@chcfoundation.com](mailto:info@chcfoundation.com) , or by telephone at 902-667-5400 ext 6126.

## **9. Access to Personal Information**

- a) Upon request, a person will be informed of the existence, use and disclosure of personal information of the person and shall be given access to that information. A person can challenge the accuracy and completeness of the information and have it amended as appropriate.

## **10. Challenging Compliance**

- a) A challenge concerning compliance with the above principles should be made to the Privacy Officer c/o Managing Director, Cumberland Health Care Foundation, 19428 Highway 2, RR 6, Amherst, NS B4H 1N6, by email to [info@chcfoundation.com](mailto:info@chcfoundation.com) or by telephone at 902-667-5400 ext 6126.

If you have any questions, please contact Managing Director and Privacy Officer, Cumberland Health Care Foundation, 19428 Highway 2, RR 6, Amherst, NS B4H 1N6, by email to [info@chcfoundation.com](mailto:info@chcfoundation.com) or by telephone at 902-667-5400 ext 6126.

The elements of our privacy policy are as follows:

1. We do not lend, exchange, rent or sell our donor lists to other organizations.
2. The personal information you provide when making an online donation or registering for an event will be protected by the Foundation and will not be disclosed to any third parties.
3. The Foundation may gather data concerning traffic on the website for statistical analysis. The data is not linked to your personal information and is used strictly to improve the content of the site.
4. When you make a donation online, a secure connection is established and your information encrypted to prevent interception during the transaction. The secure connection is maintained until the transaction is complete or terminated.
5. Employees of the Cumberland Health Care Foundation who have access to your personally identifiable information in connection with processing donations are required

to keep the information confidential. They are not permitted to use this information for any purpose other than to carry out the services they are performing for the Foundation.

6. If you provide us with your postal address or email address, you may receive periodic mailings regarding the Cumberland Health Care Foundation's services or upcoming events. If you prefer not to receive these mailings, please let us know by sending an e-mail to [info@chcfoundation.com](mailto:info@chcfoundation.com) or by calling the foundation office at 667-5400 ext 6210.
7. If you have supplied your telephone number online, you may receive telephone contact from us responding to any requests you may have made.
8. Our website contains links to websites of other organizations that maintain their own privacy and security policies. This policy articulates the privacy practices of the Cumberland Health Care Foundation site only.