

	Policy Number: 17		
	DONOR PRIVACY	Page:	Page 1 of 6
		Issue Number:	2 – FINAL
		Approval Date:	June 20, 2017
		Effective Date:	June 20, 2017
		Reviewed:	VRHF Chair Policy and By-Law
		Approved:	VRHF Board of Directors

1. Purpose

The purpose of this policy is to outline the expectations for handling personal information within the Valley Regional Hospital Foundation.

2. Definitions

- 2.1 Donor – for the purposes of this policy, “donor” includes past, current and future VRH Foundation contributors.
- 2.2 Staff – for the purposes of this policy, “staff” includes all employees, members of the Board of Directors, and volunteers.
- 2.3 Personal Information – means information in any form (written, electronic or oral) about an identifiable individual. Personal information does not include publicly available information.
- 2.3 Publicly Available Information – personal information consisting of the name, address, telephone number, email or social media data of an individual that is found in any public domain.

3. Scope

- 3.1 This policy applies to the protection of personal information gathered by the Valley Regional Hospital Foundation. The policy will be reviewed regularly to ensure compliance with applicable statutes as follows:
 - 3.1.1 Personal Information Protection and Electronic Documents Act (PIPEDA)
 - 3.1.2 Nova Scotia Freedom of Information and Protection of Privacy Act

As well, VRH Foundation complies with established ethical guidelines highlighted by the Canadian Centre for Philanthropy Ethical Fundraising and Accountability Code.
- 3.2 The Valley Regional Hospital Foundation’s Donor Privacy Policy is based on the 10 principles of the Canadian Standards Association’s Model Code for the Protection of Personal Information (CAN/CSA-Q830-96), which serves as a national standard of Canada and is now codified in law through Schedule 1 of the federal Personal Information Protection and Electronic Documents Act (PIPEDA). The 10 principles form the basis of the Foundation’s privacy policy. They are: accountability, identifying purposes, consent, limiting collection, limiting use, disclosure and

	Policy Number: 17		
	DONOR PRIVACY	Page:	Page 2 of 6
		Issue Number:	2 – FINAL
		Approval Date:	June 20, 2017
		Effective Date:	June 20, 2017
		Reviewed:	VRHF Chair Policy and By-Law
		Approved:	VRHF Board of Directors

retention, accuracy, safeguards, openness, individual access and challenging compliance. **(Further information see Appendix A- Principles of VRH Foundation privacy policy)**

4. Procedures

5. Responsibilities

- 5.1 The Valley Regional Hospital Foundation respects the privacy of our donors. We do not sell, rent or trade our donor lists. We collect, use and disclose personal information only for the purpose of processing donations, keeping our donors informed about the activities of the hospital and Foundation, and to ask for their support for our mission.
- 5.2 Anyone for whom we collect information can expect that it will be carefully protected and that any use of this information is subject to consent. We offer our donors and prospective donors numerous privacy options, including the option to limit or opt-out of future contact.
- 5.3 The Valley Regional Hospital Foundation employees 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.
- 5.4 We take measures to ensure the integrity of information is maintained and to prevent its being lost or destroyed. Individuals may access their personal information at any time to ensure that it is correct and current or to edit it.

6. Associated Documents

Appendix A – Principles of the VRH Foundation Donor Privacy Policy

7. Related Forms

Confidentiality agreement

8. Related Policies



Policy Number: 17

DONOR PRIVACY

Page:	Page 3 of 6
Issue Number:	2 – FINAL
Approval Date:	June 20, 2017
Effective Date:	June 20, 2017
Reviewed:	VRHF Chair Policy and By-Law
Approved:	VRHF Board of Directors

Reviewed: _____
 VRHF Chair Policy and
 Bylaw

Approved: _____
 VRHF Board Chair

Printed
 Names: _____

Approval Date: _____

Effective Date: _____

DISTRIBUTION AND AMENDMENT SHEET

Distribution: This document is distributed as follows:

1. Master Policy Binder
2. VRHF Website – Board of Directors Section

Amendments

Issue	Section	Summary of Amendment	Date
Draft	All	New policy	March, 2017
Final			June 20, 2017

	Policy Number: 17		
	DONOR PRIVACY	Page:	Page 4 of 6
		Issue Number:	2 – FINAL
		Approval Date:	June 20, 2017
		Effective Date:	June 20, 2017
		Reviewed:	VRHF Chair Policy and By-Law
		Approved:	VRHF Board of Directors

Appendix A- Principles of VRH Foundation Privacy Policy

Principle 1 – Accountability

The Valley Regional Hospital Foundation is responsible for personal information under its custody or control, including information that it has transferred to a third party for processing. All staff are accountable for ensuring the privacy and confidentiality of any personal information they encounter at the Valley Regional Hospital Foundation. Each staff is required to sign a confidentiality agreement. The Valley Regional Hospital Foundation has policies and procedures to receive and respond to privacy complaints and inquiries.

Principle 2 – Identifying Purposes

The Valley Regional Hospital Foundation identifies the purposes for which it collects personal information through this policy. The purposes are:

- To process and receipt donations that comply with Canada Revenue Agency requirements;
- To provide donors and potential supporters information about Valley Regional Hospital and the VRH Foundation activities;
- To provide donors with periodic stewardship information;
- To provide donors with appropriate recognition by the Valley Regional Hospital and VRH Foundation;
- To respond to information requests from donors or potential supporters;
- To facilitate participation of donors and potential supporters in Valley Regional Hospital Foundation events;
- To solicit potential donors; and,
- To facilitate the administrative, planning and quality review activities of VRH Foundation.

If personal information is to be used for a purpose not identified above, the VRH Foundation will identify the new purpose and obtain consent of the individual prior to using the information.

Principle 3 – Consent

The Foundation collects a limited amount of personal information about its donors and potential supporters. The collection of personal information is limited to that which is necessary for the purposes identified by the Foundation. Information will be collected by fair and lawful

	Policy Number: 17		
	DONOR PRIVACY	Page:	Page 5 of 6
		Issue Number:	2 – FINAL
		Approval Date:	June 20, 2017
		Effective Date:	June 20, 2017
		Reviewed:	VRHF Chair Policy and By-Law
		Approved:	VRHF Board of Directors

Appendix A- Principles of VRH Foundation Privacy Policy

means. The Foundation does not collect any personal health information, other than that which may be volunteered by an individual. An individual may withdraw or limit consent to use of personal information at any time, subject to legal or contractual restrictions and reasonable notice. The individual may opt-out of having his or her name published on donor recognition vehicles in any public venue.

Principle 4 – Limiting Collection

The Foundation will not require an individual to consent to the collection, use or disclosure of personal information beyond that required by law. Individuals, who supply telephone numbers on-line, by phone or by mail, may receive telephone contact from us if they have requested further information. If individuals do not wish to receive these calls they can let us know by sending an email, placing a phone call or in writing. Periodic mailings or emails on VRH Foundation’s services or events may be sent to individuals. If individuals do not wish to receive these printed materials or emails they can let us know by unsubscribing to emails, placing a phone call or in writing. Whenever an individual withdraws their consent for the use of the personal information the VRH Foundation will ensure all future contact is limited or discontinued according to the instruction of the individual.

Principle 5 – Limiting Use, Disclosure and Retention

Personal information will 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 will be retained only as long as necessary for the fulfillment of those Foundation purposes. The Foundation respects all requests for anonymity and will further limit disclosure accordingly in such circumstances.

Principle 6 – Accuracy of Personal Information

VRH Foundation will not routinely update personal information, except as is necessary to fulfill the purposes for which the information was originally collected or upon notification by the individual. To change or modify personal information at the Foundation, contact the office at (902) 678-5414 or email vrh.foundation@ns.sympatico.ca. Personal information will be kept as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used and/or disclosed.

Principle 7 – Safeguards for Personal Information

The VRH Foundation takes all possible measures to protect data from loss, misuse, unauthorized access, disclosure, alteration or destruction. Personal information of donors

	Policy Number: 17		
	DONOR PRIVACY	Page:	Page 6 of 6
		Issue Number:	2 – FINAL
		Approval Date:	June 20, 2017
		Effective Date:	June 20, 2017
		Reviewed:	VRHF Chair Policy and By-Law
		Approved:	VRHF Board of Directors

Appendix A- Principles of VRH Foundation Privacy Policy

(including title, name, address, telephone number, email address, giving history) is stored in a password protected database and manual filing system within the confines of the VRH Foundation offices. Access is limited to a “need to know” basis. All staff members agree to a confidentiality clause as part of their employment contract. In addition, volunteers with access to personal information must sign a Confidentiality Agreement. All personal information provided by Foundation website visitors and donors is secure information. In order to prevent unauthorized access and ensure proper use of information, the Foundation uses password protocols and encryption software to protect personal and other information received when a donation is made online.

Principle 8 – Openness Concerning Policies and Practices

Upon request, the VRH Foundation will provide additional information about its privacy policies and practices.

Principle 9 – Individual Access to One’s Own Personal Information

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 that information. An individual may access their information to confirm accuracy and completeness of the information or to have it amended.

Principle 10 – Challenging Compliance

Questions, concerns or complaints relating to the Foundation’s Privacy Policy on the treatment of personal information should be addressed to the Executive Director, VRH Foundation. All complaints will be addressed and will be part of a report to the Board of Directors.