

Privacy Policy	 WOODSTOCK HOSPITAL FOUNDATION WH – Foundation	Document owner: Woodstock Hospital Foundation
		Originate Date: November 2017
Approval as required: Board of Directors Signature:		Review/Revision Date: April 16, 2019

PURPOSE

The Woodstock Hospital Foundation (WHF) is committed to protecting the privacy of the personal information of its employees, volunteers, donors, patients/clients of the Woodstock Hospital and other stakeholders. We value the trust of those we deal with, and of the public, and recognize that maintaining this trust requires that we be transparent and accountable in how we treat the information that is shared with us. The WHF adopted the 10 principles set out in the National Standard of Canada Model Code for the Protection of Personal Information and Personal Health Information Protection Act 2004 (PHIPA).

OBJECTIVE

During the course of our various projects and activities, WHF frequently gathers and uses personal information. Anyone from whom we collect such information should expect that it will be carefully protected and that any use of, or other dealing with, this information is subject to consent – we do not rent, sell or trade personal information with third parties.

SCOPE

This policy applies to all WHF representatives (staff, and volunteers) who are involved in any aspects of fundraising including the identification, cultivation, solicitation and stewardship of prospective donors of the Hospital.

As a health information custodian, Woodstock Hospital may disclose to WHF patient names and mailing addresses without the express consent of the individual. The WHF uses this information within the following compliance requirements:

- Fundraising activities are undertaken for a charitable or philanthropic purpose related to the custodian's operations
- Custodian has posted or made available a notice informing patients of the custodian's intent to use or disclose the information for fundraising purposes
- The individual has not opted-out within 60 days from the time of notice
- All solicitations contain an easy opt-out from further solicitations
- No solicitations or communications contain information about an individual's health or health care

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DEFINITIONS

Personal Information

Information about an identifiable individual, but does not include the name, title or business address or business telephone number of a staff member of an organization. Information in the public domain is not subject to privacy legislation and as such is not included in this policy.

Confidentiality

The obligation upon an organization or person to protect information that has been entrusted to its care for a specific purpose and to ensure that information is only accessible to those authorized to have access (refers to the moral, ethical, professional and employment obligation).

Consent

An individual's consent is required regarding the collection and proposed use of personal information when information is collected. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from an individual's action or inaction. An individual's consent is required before confidential information is released to outside parties.

Third Party

Vendors or other individuals or agencies, who do not have an employment, educational, or privileged association with the organization.

PRACTICES:

WHF observes the following practices when collecting, maintaining and using personal information:

Personal Information

Where WHF stakeholders use their home contact information as business contact information, WHF considers that the contact information provided is business contact information, and is not therefore subject to protection as personal information.

WHF considers donor and volunteer information always to be personal information, and does not disclose information about donors or volunteers without consent.

Confidentiality

Donors who request their name and/or the amount of the gift not be publically released shall remain anonymous.

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Openness

Upon request, donors shall be given access to the information in their donor record.

Limited Collection

The collection of personal information is limited to that which is relevant and necessary to our programs and fundraising efforts. WHF shall not make unwarranted or intrusive inquiries into a donor or prospect’s gift history or personal life. WHF attributes all data that it collects.

Limited Use, Disclosure and Retention

Personal information, written or verbal, shall 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 shall be retained only as long as necessary for the fulfillment of those purposes.

Accuracy

Personal information shall be as complete, accurate and up-to-date as possible. Donors are encouraged to review, correct and update personal information.

Security Safeguards

Personal information gathered by WHF shall be kept in confidence. WHF personnel shall be authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained.

Appropriate physical and electronic controls shall be used to ensure personal information is secure. Access to donor and volunteer records shall be limited to those who require such information to fulfil their job responsibilities. Special protection shall be given to all records pertaining to anonymous donors.

Review Process

The Privacy Policy will be reviewed on an annual basis by the SDO of WHF and CEO of WH. All changes will be reported to the Board of Directors and any major changes will be brought forward for approval by Board of Directors.

REFERENCES

Imagine Canada

Fundraising under PHIPA, Information and Privacy Commissioner of Ontario Fact Sheet