



Bridgepoint Health Foundation Privacy Policy

PURPOSE

Bridgepoint Health Foundation is committed to protecting the privacy of personal information which it collects, uses and discloses for fundraising purposes. To this end, the purpose of this policy is to outline the expectations for handling personal information within Bridgepoint Health Foundation.

DEFINITIONS

Staff – for the purpose of this policy “staff” includes all employees, members of the Board of Directors, volunteers, students, contractors or service providers at or associated with Bridgepoint Health Foundation.

Personal Information – means information about an identifiable individual in any form, including written, electronic or oral. Personal information does not include publicly available information.

Publicly Available Information – personal information consisting of the name, address and telephone number of an individual that is found in one or more of the following locations:

- (a) in a telephone directory;
- (b) in a publication, including a magazine, book or newspaper, in printed or electronic form, that is available to the public;
- (c) in a professional or business directory, listing or notice, that is available to the public,
- (d) in a registry collected under a statutory authority and to which a right of public access is authorized by law; and
- (e) in a record or document of a judicial or quasi-judicial body, that is available to the public.

Items (c), (d), and (e) are only publicly available information where the collection, use and disclosure of the personal information relates directly to the purpose for which the information appears in the directory, listing, notice, registry, record or document.¹ This means that information in a publicly available staff directory, for example, can only be considered publicly available information for the purposes for which the directory was originally published.

¹ *Personal Information Protection and Electronic Documents Act*, Regulations Specifying Publicly Available Information, P.C. 2000-1777, 13 December, 2000.

POLICY

Bridgepoint Health Foundation handles personal information in accordance with all applicable privacy legislation, including the federal *Personal Information Protection and Electronic Documents Act* and the Ontario *Personal Health Information Protection Act*. Bridgepoint Health Foundation has also adopted the Canadian Centre for Philanthropy Ethical Fundraising and Accountability Code.

The Foundation recognizes that personal information is a critical enabler to achieving its goal of improving the quality of life for patients, clients, families and communities served by Bridgepoint Health. Bridgepoint Health Foundation is committed to protecting the privacy and security of all personal information with which it is entrusted in order to achieve this goal.

The Bridgepoint Health Foundation Privacy Policy provides a framework for all other policies in Bridgepoint Health Foundation and is based on the ten principles of the Canadian Standards Association's Model Code for the Protection of Personal Information (CAN/CSA-Q830-96), which were published in March 1996 as a national standard of Canada and are now codified in law through Schedule 1 of the federal *Personal Information Protection and Electronic Documents Act* (PIPEDA). The ten principles, which form the basis of the Bridgepoint Health Foundation Privacy Policy, are interrelated, and Bridgepoint Health Foundation will adhere to the ten principles as a whole. The ten principles are: accountability, identifying purposes, consent, limiting collection, limiting use, disclosure and retention, accuracy, safeguards, openness, individual access and challenging compliance. A complete explanation of the principles and their application at Bridgepoint Health Foundation is provided in Appendix A.

Appendix A

Principle 1 – Accountability

Bridgepoint Health 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 is accountable for ensuring the privacy and confidentiality of any personal information they encounter at Bridgepoint Health Foundation. Bridgepoint Health Foundation ensures that this duty also extends to third parties through contractual and other means, such as confidentiality and data sharing agreements. All staff are required to sign a confidentiality agreement.

Bridgepoint Health Foundation has policies and procedures to receive and respond to privacy complaints and inquiries. For more information, contact the Bridgepoint Health Chief Privacy Officer at (416) 461-8252 or by email at privacyoffice@bridgepointhealth.ca.

Principle 2 – Identifying Purposes

Bridgepoint Health Foundation identifies the purposes for which it collects personal information through this policy. The purposes for which Bridgepoint Health Foundation collects personal information are:

- to solicit potential donors;
- to process and receipt donations;
- to provide donors and potential supporters information about Bridgepoint Health and Bridgepoint Health Foundation activities;
- to provide donors with periodic stewardship information;
- to provide donors with appropriate recognition by Bridgepoint Health and Bridgepoint Health Foundation;
- to respond to information requests from donors or potential supporters;
- to facilitate participation of donors and potential supporters in Bridgepoint Health Foundation events;
- to facilitate the administrative, planning and quality review activities of Bridgepoint Health Foundation; and
- to comply with legal and regulatory requirements.

If personal information will be used for a purpose not identified above, Bridgepoint Health Foundation will identify the new purpose prior to using the information. Unless law requires the new purpose, Bridgepoint Foundation will obtain the consent of the individual before using the information for the new purpose.

Principle 3 – Consent

Bridgepoint Health Foundation obtains demographic information on patients and/or their substitute decision makers using implied consent as permitted under the Ontario *Personal Health Information Protection Act*. Patients, their substitute decision makers, and others who do not wish to receive solicitations from the Bridgepoint Health Foundation should contact the Bridgepoint Health Foundation at 416-461-8252.

An individual may withdraw or limit consent at any time, subject to legal or contractual restrictions and reasonable notice. For example, if an individual makes a donation, the Foundation will use the individual's information to process the donation. However, the individual may opt-out of having his or her name published on donor recognition lists. Bridgepoint Health Foundation will inform the individual of the implications of such a withdrawal or limitation.

Principle 4 – Limiting Collection

Bridgepoint Health Foundation will only collect the information it requires to fulfill the purposes outlined above under Principle 2 (Identifying Purposes). Bridgepoint Health Foundation will only collect personal information by fair and lawful means.

To the greatest extent possible, Bridgepoint Health Foundation will collect personal information directly from the individual; however, the Foundation may also collect personal information about individuals indirectly from publicly available information sources such as telephone directories or newspaper articles.

Principle 5 – Limiting Use, Disclosure, and Retention

Bridgepoint Health Foundation will not use or disclose personal information for purposes other than those identified in this policy, except with the consent of the individual or as required by law. Bridgepoint Health Foundation will only retain personal information as long as necessary for the fulfillment of the purposes identified, or as permitted or required by law.

Bridgepoint Health Foundation does not trade, rent, or sell any personal information.

Personal information that is no longer required to fulfill the identified purposes will be destroyed, erased, or made anonymous.

Principle 6 – Accuracy

Bridgepoint Health 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 Bridgepoint Health Foundation, contact the Bridgepoint Health Foundation at 416-461-8252.

Principle 7 – Safeguards

Bridgepoint Health Foundation has implemented security safeguards to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which it is held.

- Only employees or authorized third parties with a need-to-know the information for their job duties will have access to personal information.
- Bridgepoint Health Foundation will use contractual and other methods to ensure personal information transferred to third parties for processing receives a comparable level of security provided by the Foundation.
- The methods of safeguards used to protect personal information at the Bridgepoint Health Foundation are:
 - physical measures, such as locked filing cabinets and restricted access to offices and other places personal information might be stored;
 - organizational measures, such as this policy or limiting access to information on a “need-to-know” basis; and
 - technical measures, such as the use of unique usernames and passwords to obtain access to personal information. Bridgepoint Health Foundation’s software is routinely updated to maximize effectiveness of such measures and protect against malicious software and unauthorized access.
- Care will be used in the disposal or destruction of personal information to prevent unauthorized parties from gaining access to the information.

Principle 8 – Openness

Upon request, Bridgepoint Health Foundation will provide additional information about its privacy policies and practices. Individuals will be able to acquire this information without unreasonable effort. This information will be made available in a form that is generally understandable, and may include:

- the contact information of the Chief Privacy Officer to enable individuals to make inquiries or complaints about Bridgepoint Health Foundation's information management policies and practices;
- the means of gaining access to personal information held by Bridgepoint Health Foundation; and
- a description of the personal information held by the organization (for example, the foundation commonly collects the following information on its donors: name, title, address, telephone number, past donations and other relevant contact information), including a general account of its use.

Principle 9 – Individual Access

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 challenge the accuracy and completeness of the information and have it amended as appropriate.

- Personal information will be provided in an understandable form, at minimal or no cost to the individual.
- In certain situations, Bridgepoint Health Foundation may not be able to provide access to all the personal information it holds about an individual. Exceptions to the access requirement will be limited and specific. The reasons for denying access will be provided to the individual upon request. Exceptions may include information that is prohibitively costly to provide, information that contains references to other individuals, information that cannot be disclosed for legal or quality assurance and improvement reasons, and information that is subject to solicitor-client or litigation privilege.
- Bridgepoint Health Foundation will seek to indicate the source of an individual's personal information and will allow the individual access to this information. In addition, Bridgepoint Health Foundation will provide an account of the use that has been made or is being made of this information.
- Individuals may be required to provide sufficient information to permit Bridgepoint Health Foundation to provide an account of the existence, use and disclosure of personal information. The information provided will only be used for this purpose.
- When an individual successfully demonstrates the inaccuracy or incompleteness of his or her personal information, Bridgepoint Health Foundation will amend the information as required. Depending upon the nature of the information challenged, amendment involves the correction, deletion, or addition of information.
- When a challenge is not resolved to the satisfaction of the individual, Bridgepoint Health Foundation will record the substance of the unresolved challenge.

Principle 10 – Challenging Compliance

An individual may address a challenge concerning compliance with the above principles or inquiries about Bridgepoint Health Foundation's personal information management practices to the Bridgepoint Health Chief Privacy Officer at (416) 461-8252 or by email at privacyoffice@bridgepointhealth.ca.

Bridgepoint Health Foundation will investigate all complaints. If a complaint is found to be justified, Bridgepoint Health Foundation will take appropriate measures, including, if necessary, amending its policies and practices.

Any breaches of confidentiality are extremely serious and grounds for discipline. If a violation of this policy is found to have occurred in the course of an investigation or otherwise, the result will be immediate disciplinary action, up to and including termination of employment.