

A13: Foundation's Privacy Policy

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Key Contact Regarding Policy:	President & CEO

Definitions:

Need to Know - Is defined as the requirements of an individual or committee to have donors' personal information contingent on their responsibilities, assigned with the discretion of the President & CEO. This includes members of the Foundation staff, fundraising committee and /or volunteers carrying out fundraising activities.

Personal Information – Is defined as identifiable information about an individual, including name, preferred address, phone number and other contact information.

Stakeholders – Are defined as individuals or groups (internal or external) who have an interest in the Foundation fulfilling its mission. These include employees, volunteers, donors, representatives of the health authority and members of the Board of Directors

Stewardship – Is defined as the relationship-building process that occurs after a donor makes a gift. The main purpose of stewarding donors is to build trust, and inspire them to give again.

This policy outlines the procedures followed by the Foundation to keep information collected about donors, employees, volunteers and all other stakeholders confidential. It also outlines that all the information collected by the Foundation is used for the sole purpose for which it was collected.

The Foundation values the trust its stakeholders have in it and recognizes that to maintain this trust, the Foundation must be transparent and accountable for appropriate use of information collected from its Donors. This policy meets all legislative requirements with respect to privacy and applies to all employees, volunteers, and members of the Board of Directors of the Foundation.

Distribution: The Cobequid Health Centre Foundation Board of Directors, staff, volunteers, donors and all other stakeholders. The policy is available to the public on the Cobequid Health Centre Foundation’s website. It is available upon request from the Foundation’s office.

Guiding Principles and Background: This policy provides clarity for the management of all information collected by the Foundation from its donors, volunteers, and other stakeholders. The Cobequid Health Centre Foundation Board of Directors and President & CEO recognizes the need to share donor/staff/volunteer information within the organization for defined purposes (Such as: donor visitation, staff issues/discussion, volunteer recognition.)

The Cobequid Health Centre Foundation values its stakeholders and safeguards personal information entrusted to it. The Foundation does not share, trade, lend or sell donor lists or any information with any other organization.

The Foundation adheres to the guidelines of the **Donor Bill of Rights** which commits to the handling of personal information with respect and confidentiality. The Foundation also recognizes that in limited circumstances it must ensure such protection which is up to the standards of the **Personal Information and Electronic Documents Act (PIPEDA)**.

This policy also permits the sharing of donor names and giving history with Cobequid Health Centre Foundation Staff, Board Committees, and Volunteers who are either members of fundraising committees and/or have a demonstrated “need to know” as part of their assigned responsibilities.

Lists of names, addresses and broad donor categories will only be circulated to general committee members. This information is similar to the data which is available broadly through donor recognition, but may include donors who have not been included on the donor wall.

Detailed donor history and information may be given to fundraising team members who are preparing to approach a prospective donor to request a donation.

All donor list information will be circulated in hard copy only and will be clearly marked *Confidential Property of the Cobequid Health Centre Foundation*. Electronic copies of donor data will be provided for in exceptional circumstances (Such as time sensitive matters) only upon the approval of the President & CEO and a reminder that this data is confidential and not to be shared further.

Lists will be returned to the President & CEO of the Cobequid Health Centre Foundation for proper disposal when the need for the information has ceased.

Procedure:

1. Accountability for Personal Information:

Each time an individual donates to the Foundation or participates in a program or event their information gets recorded in the Foundation's secure database. This information becomes a part of the Foundation. All public records or information included in telephone directories (names, emails, telephone numbers, and addresses) which are not considered personal, may be used to acquire support of these potential donors.

2. Identifying Purposes for the Collection of Personal Information:

The information collected at the time of donations is recorded for the following purposes:

- 2.1 To comply with Canada Revenue Agency requirements
- 2.2 To provide donors with periodic stewardship and information (Such as showing the donor photos of equipment they Funded/helped fund in use at the Cobequid Centre.)
- 2.3 To provide donor recognition by the Foundation
- 2.4 To provide donors with information about future activities of the Foundation
- 2.5 To promote opportunities where donors and potential supporters may support the foundation's campaigns

The Information collected at the time of volunteering is collected for the following purposes:

- 2.6 To provide potential volunteers with information about Foundation events and activities
- 2.7 To promote opportunities where potential volunteers may support the Foundation
- 2.8 To comply with event/program insurance.

3. Limiting Collection of Personal Information:

The Cobequid Health Centre Foundation collects limited information about its donors, volunteers and stakeholders. The nature of information is limited to the purpose identified by the Foundation as necessary at the time of collection. All the information is collected by fair and lawful means, with the consent of the interested party.

The Foundation does not collect any health information, apart from that of our volunteers which may be involved in activities during events and campaigns.

All personal information is stored on the Foundation's secure donor database.

4. Consent for the Collection, Use and Disclosure of Personal Information:

The Foundation's approach to obtaining consent depends on the context and the type of personal information being collected. The sensitivity of the information is the primary

factor in determining the appropriate method of consent. The Foundation will not request consent to collect, use, or disclose personal information beyond what is legally required.

For example, when an individual purchases a raffle ticket from the Foundation or a Foundation volunteer and provides contact information, it is reasonable to assume they are consenting to be contacted if they win. However, it is also reasonable to expect that the individual's information will not be shared with other fundraising organizations.

In certain circumstances, personal information may be collected, used, or disclosed without the individual's knowledge or consent. This may occur for legal or security reasons, or when obtaining consent would compromise efforts such as the prevention or detection of fraud or law enforcement activities.

In cases where the Foundation does not have a direct relationship with the individual, obtaining consent may not be feasible.

The Foundation communicates with stakeholders through periodic emails and printed materials. Individuals who do not wish to receive these communications may inform the Foundation or, in the case of electronic messages, unsubscribe using the link provided. If an individual requests to restrict or withdraw their consent for the use of their personal information, the Foundation will respect their wishes and ensure that future contact is either limited or discontinued, as requested.

5. Limiting Use, Disclosure and Retention of Personal Information:

Personal information collected by the Foundation will be used for the purpose for which it was collected, except with the consent or by the requirement of the law. The duration for which the personal information is retained will depend on the time required to complete those objectives.

If the Foundation wants to use personal information for a different purpose, the Foundation will seek the individuals consent. If written, email is permissible.

The Foundation has developed guidelines and procedures for storing and retention of personal information. The Foundation is bound by legislative guidelines which require that all information be stored for a minimum of 7 years. The Foundation respects all requests of anonymity and further limits disclosure in such situations.

See the Foundations Anonymity Policy.

6. Accuracy of Personal Information:

Personal information collected by the Foundation will be kept accurate and for the purpose for which it is to be used/or disclosed. The Foundation will every effort to minimize the possibility of errors.

The Foundation will not routinely update personal information, unless such a process is required for the purpose for which the information was collected, or unless the individual (interested person) personally requests a change.

7. Protection of Personal Information:

The Foundation takes all measures to protect and safeguard data from loss, misuse, unauthorized access, disclosure, alteration or destruction.

Personal information of the donors (including title, name, address, telephone number, email address, giving history) is stored in a password protected database and manual filing system, behind the locked offices of Cobequid Health Centre Foundation. Further, access is limited to a “need to know basis”. Passwords are changed on the 1st business day of the month, every three months.

Office records and files are kept for a minimum of 7 years as per Canada Revenue Guidelines. On an annual basis, files that have met this standard are discarded by secure shredding.

Physical computer hardware is secured using padlocks to the desktop. This provides additional security against theft.

All staff members agree to a confidentiality clause at the time of signing their employment contract. Volunteers/ Board of Directors requiring access to our donor database must sign a volunteer confidentiality agreement.

8. Reviewing the Policies and Practices:

The Foundation makes updates its privacy policy every 3 years (or sooner, if needed). The Foundation website will contain the most accurate, up-to-date information regarding its practices and policies.

9. Individual’s Access to one’s own Personal Information:

Individuals may request to know their own personal information. They may access personal information any time to make sure that it is accurate, up-to-date and may edit the information if so desired.

Note: In certain situation an individual may be denied access to their own personal information. In such cases the individual will be provided with a reason upon request.

The reason for denying may include but is not limited to:

9.1 Prohibitive or costly to provide

9.2 Information may include references to, or personal information of other individuals

9.3 Information that cannot be disclosed for legal reasons.

10. Managing Compliance:

The Foundation abides by its Privacy Policy. If an individual has concerns, questions or complaints regarding the policy, he/she/they may contact the President & CEO of the Foundation. Complaints will be dealt with in compliance with the Foundation's Complaints Policy.

Reference Links: [Privacy - PIPEDA](#)

Reference Policies: Anonymity Policy