



Canadian Premature Babies Foundation

Policy: Privacy and Confidentiality
Date : Feb 2019 Reviewed June 2020

Purpose

Canadian Premature Babies Foundation (CPBF) recognizes the value of its relationships with donors, volunteers, employees, as well as families and individuals who share their stories with us. CPBF is committed to respecting and protecting their personal information. CPBF values the trust of those we deal with, and of the public, and recognize that maintaining this trust requires transparency and accountability in our treatment of the information that is entrusted to us. Accordingly, CPBF complies with the federal Personal Information Protection and Electronic Documents Act (PIPEDA), and embraces ethical guidelines established by the Association of Fundraising Professionals, the Association of Healthcare Philanthropy and the Canadian Centre for Philanthropy.

CPBF's privacy policy adheres to the 10 principles that comprise the Canadian Standards Association Model Privacy Code. These principles, and CPBF's related policies, are set forth below.

Policy

Principle 1 - Accountability

An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.

- 1.1 Accountability for CPBF's compliance with privacy legislation rests with the Executive Director, who is the privacy officer.
- 1.2 CPBF is responsible for personal information in our possession.

Principle 2 - Identifying Purposes

The purposes for which personal information is collected shall be identified by CPBF when or before the information is collected.

2.1 The purposes will be limited to those which are related to our objectives and which a reasonable person would consider to be appropriate in the circumstances. We collect personal information concerning our donors for the following reasons:

- To comply with CRA requirements for gift processing
- To thank and publicly recognize donors, if they consent to such recognition
- To provide donors with information about how donated funds are used by CPBF



Canadian Premature Babies Foundation

- To keep donors informed about CPBF's activities
- To promote opportunities for donors and potential donors to support CPBF
- To build and maintain relationships

The Foundation will specify the identified purposes in writing (including electronic communication), to the individual from whom personal information is being collected either at the time of collection or after collection but prior to use or disclosure. We will state the identified purposes in such a manner that an individual can reasonably understand how the information will be used or disclosed.

Principle 3 - Consent

The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except where inappropriate. The manner in which CPBF obtains consent for the collection of personal information varies with the sensitivity of the information being collected.

The principle requires "knowledge and consent", and CPBF will make a reasonable effort to ensure that individuals are aware of the purposes for which information the information is collected at the time of collection.

Individuals can give consent:

(a) in writing, such as when completing a donation or registration form.

The Foundation may collect, use and disclose personal information without consent if that information is considered by law to be in the public domain. Sources of public information include telephone and professional directories, newspapers, periodicals and public registries.

CPBF uses cookies, tracking pixels and related technologies on some of our website pages. Cookies are small data files that are served by our platform and stored on your device. Our site uses cookies created by us and by our partners for a variety of purposes including to operate and personalize the website. Also, cookies may also be used to track how you use the site to create customized target ads on other websites.

Principle 4 - Limiting Collection

The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means. CPBF will not collect information indiscriminately. CPBF will specify the types of information collected, limited to that which is necessary and reasonable to fulfil the



Canadian Premature Babies Foundation

purposes identified. The Foundation will collect personal information by lawful means and will not mislead individuals about the purposes for which information is being collected.

Principle 5 - Limiting Use, Disclosure and Retention

Personal information 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 fulfilment of those purposes.

5.1 When CPBF uses personal information for purposes other than those given at the time of collection, consent will be obtained for these purposes

5.2 CPBF does not sell, rent or trade mailing lists. Personal information is only disclosed to third parties who have signed an agreement binding them to the Foundation's privacy policies.

5.3 Personal information will be retained as long as the purpose for which the information was originally collected remains valid.

Principle 6 - Accuracy

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

6.1 CPBF will use its best efforts to ensure that information that is used on an ongoing basis, including information that is disclosed to third parties, and information that is used to make a decision about an individual (such as a giving recognition category), is accurate, complete and up to date.

Principle 7 - Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

7.1 CPBF's safeguards will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which the information is held.

7.2 We will make our employees aware of the importance of maintaining the confidentiality of personal information, and we will exercise care in the disposal and destruction of personal information to prevent unauthorized parties from gaining access to it. All employees and volunteers having access to personal information are required to sign an oath of confidentiality (see Appendix A).



Canadian Premature Babies Foundation

7.3 Our methods of protection will include physical measures, as appropriate (e.g. restricted access to offices), organizational measures (e.g. limiting access on a "need-to-know" basis) and technological measures (e.g. the use of passwords).

7.4 Third parties are expected to safeguard personal information entrusted to them in a manner consistent with the policies of CPBF.

Principle 8 - Openness

An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

8.1 CPBF will be open about privacy policies and procedures with respect to the management of personal information and will make them readily available in a form that is generally understandable.

8.2 The information made available will include:

(a) the name or title and contact information of the Privacy Officer who is accountable for compliance with CPBF's policies and procedures, and to whom complaints or inquiries can be forwarded;

(b) a copy of any document that explains the CPBF's policies, procedures, standards or codes.

Principle 9 - Individual Access

Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

9.1 CPBF will respond to an individual's request within a reasonable length of time, but no longer than one month. While our response will typically be provided at no cost to the individual, depending on the nature and amount of information involved, we reserve the right to impose a cost.

9.2 The requested information will be made available in a form that is generally understandable. For example, where the CPBF uses abbreviations or codes to record information, an explanation of those codes will be provided. Where possible, we will provide sources for the information.



Canadian Premature Babies Foundation

9.3 For the CPBF to provide an account of the existence, use and disclosure of personal information, an individual may be asked to provide additional information to aid in the search. The additional information provided will only be used for this purpose.

9.4 Upon request, the Foundation will provide specific information about third parties to whom personal information has been disclosed.

9.5 When an individual successfully demonstrates the inaccuracy or incompleteness of personal information, the Foundation will amend the information as required. Where appropriate, the amended information will be transmitted to third parties having access to the information in question.

Principle 10 - Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the CPBF Executive Director. Contact information is available on the CPBF website.



CPBF

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