



POLICY NAME:	Privacy Policy
POLICY NO:	QR.10
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AREA/DEPARTMENT:	QUALITY & RISK

1. Introduction

Canuck Place Children's Hospice (CPCH) is committed to protecting the privacy of the personal information of its volunteers, donors, and other supporters (hereafter known as Supporters), and employees entrusted to us. CPCH values the trust of those we deal with, and of the public, and recognizes that maintaining this trust requires that CPCH be transparent and accountable in how we treat the information that people choose to share with us.

The Privacy Officer for CPCH is the Chief Financial Officer (CFO).

This policy describes how CPCH collects, uses, shares, and discloses the personal information of its Supporters and employees. This policy applies to CPCH and to any other person providing services on our behalf. A copy of this policy will be provided upon request.

CPCH complies with the requirements of the *Personal Information Protection Act*, *Personal Information Protection and Electronic Documents Act* (Canada) PIPEDA, and we uphold the principles of the Donor Bill of Rights developed by the Association of Fundraising Professionals as applicable. CPCH is Payment Card Industry (PCI) compliant.

Please note that this policy relates to the personal information of our Supporters and employees. There are additional privacy and consent policies for CPCH clinical operations.

2. Personal Information

- 2.1. During the course of regular activities, CPCH gathers and uses personal information. This information will be carefully guarded and any use of this information is subject to consent.
- 2.2. Personal information is any information that can be used to identify or contact a specific individual.
 - 2.2.1. There are exceptions with business contact information and certain publicly available information, such as names, addresses, and telephone numbers as published in telephone directories or online that are not considered personal information.
 - 2.2.2. CPCH's Supporters and employees who use their personal contact information as business contact information, will be considered as providing business contact information, and are not therefore subject to protection as personal information.

2.3. Personal information is collected when a Supporter supplies it to us voluntarily; e.g. by donating, purchasing event tickets, engaging with us on social media, subscribing to our e-newsletter, joining CPCH as an employee or as a volunteer.

The following are examples of the personal information that CPCH collects from Supporters and employees:

- a) contact information (including salutation, name, professional title, home and business address, phone number and email address);
 - b) payment information (such as credit card number, expiry date and 3-digit CVV/CVC);
 - c) value of any donation, sponsorship, and grant;
 - d) birth date, marital or family status;
 - e) education;
 - f) visual images such as photographs of employees, volunteers, program and event participants. In addition to the above-specified personal information, CPCH collects images of visitors to CPCH, which are taken by our security cameras (at our hospices and work sites).
- 2.4. CPCH does not disclose Supporter's personal information without consent.
- 2.5. CPCH abides by the following practices when collecting, maintaining, and using personal information.

cancuckplace.org

- a) To better understand visitors and to improve the visitor experience on our website, our website is built on Word Press platform. For more information on Word Press privacy policy: <https://automattic.com/privacy/>. CPCH's website collects data using services; no personal information is collected through these tools that would allow CPCH to identify individuals. For more information about Google Analytics, please visit: <http://www.google.com/policies/privacy/partners/>
- b) We also collect information about email open rates and click-through rates to determine whether CPCH's electronic communications using MailChimp are effective. For more information on their privacy policy: <https://www.intuit.com/privacy/statement/>
- c) CPCH may use third parties to collect data from our website anonymously for marketing purposes, e.g. advertisements. Users of our website will not be personally identified through this data and CPCH does not see any data or contact information on an individual level. These third parties may include, but are not be limited to, META (Facebook, Instagram) and/or Twitter. Supporters and employees may tailor their privacy settings to limit the collection of personal information

- d) Canuckplace.org: Our website may collect certain types of information electronically when you interact with our Sites, emails, social media accounts, online advertising, or through technologies such as cookies, web beacons, single pixel gifs and analytics engines. “Cookies” are bits of information sent from a website that speed up access to web pages and allow a server to recognize that subsequent requests to a site have come from the same user. When individuals visit CPCH’s website, we may store some data on their computer in the form of a “cookie”. A “cookie” is a small piece of text that a website places in the cookie file of a browser that allows our website to recognize their personal computer the next time they visit. Cookies by themselves do not inform us of a Supporter’s email address or otherwise identify them personally. Supporters’ web browsers can be set to accept or reject cookies. Please note that disabling or deactivating cookies may result in a reduced availability of the functionality of canuckplace.org or parts of our website may no longer function correctly.
- e) Express consent – When sending to those who have given express consent to receive email communications from Canuck Place, we must identify the sender and include an option to unsubscribe;
- f) Implied consent – When sending to those who have given implied consent by making a transaction or who have a relationship with Canuck Place as a donor or volunteer, the Foundation may send communications for up to two years from the date of the last transaction, or the end of the relationship, as long as an option to unsubscribe is included;
- g) Easy access to unsubscribe – Every electronic publication we send our supporters has an unsubscribe feature. Recipients may ‘opt out’ from receiving ecommunications or update specific subscriptions at any time by utilizing the unsubscribe feature in any of these emails.
- h) Collection of Personal Information via online donations - Before, or at the time of collection, Canuck Place Children’s Hospice will identify the purposes for which personal information is collected, used, disclosed and retained.

2.6. Canuck Place collects personal information for the following purposes via canuckplace.org:

- a) To process donations, and comply with Canada Revenue Agency requirements for gift processing;
- b) To thank and publicly recognize donors
- c) To manage our business, to protect our company assets;
- d) To administer the volunteer network;
- e) To keep our donors informed about the programs, services and activities of Canuck Place, including the use of their financial support; and

- f) To promote opportunities for donors and potential donors to support our mission.
- g) To build and maintain relationships individuals collecting personal information on behalf of Canuck Place will be able to identify the purposes for which the information is being collected. If personal information is to be used for a purpose not previously identified, Canuck Place will identify this purpose prior to use and provide individuals with an opportunity to opt-out of this activity. Canuck Place may acquire personal information through the purchase of mailing lists of prospective donors from other organizations. In such cases, the organization providing the list would be expected to obtain the required consent before disclosing personal information to Canuck Place.

3. PURPOSE OF PERSONAL INFORMATION COLLECTION

3.1. CPCH's purpose for collecting personal information is to:

- a) create a record of the Supporter's involvement with CPCH;
- b) administer employee records to fulfill legal requirements and provide employee benefits and services;
- c) keep Supporters and employees informed about fundraising and events projects, other special initiatives, or employment and volunteer opportunities;
- d) process donations, sponsorships, grants and event registrations;
- e) communicate with Supporters about their experience at CPCH, or to plan and evaluate CPCH's programs and events;
- f) contact Supporters and employees to determine their interest in purchasing tickets to a fundraising event and completing any ticket purchases and related registrations;
- g) contacting Supporters in connection with opportunities to become a volunteer with CPCH and enrolling any interested individuals as volunteers;
- h) invite volunteers to training sessions, recognition events and for volunteers' scheduling purposes;
- i) maintain a robust database of current and past Supporters of CPCH;
- j) any other reasonable purpose to which the Supporter provides consent.

3.2. A Supporter may opt out of receiving communications from us by contacting our Donor Services donorservices@canuckplace.org or by calling 604-731-4847

4. PROCESS OF PERSONAL INFORMATION COLLECTION

4.1. Collection of personal information may only take place for an authorized purpose, including those stated above and with proper notification.

- 4.2. CPCH shall collect personal information about an individual only for a necessary purpose that is connected with an authorized function or activity of CPCH.
- 4.3. Whenever possible, CPCH shall collect personal information directly from the individual that it is about, either verbally or in writing.
 - 4.3.1. Personal information shall be collected in a manner and location that ensures the security and confidentiality of such information, to the extent that it is reasonable to do so.
 - 4.3.2. When personal information is collected directly, CPCH shall notify the individual of the purpose for collection and with whom the information may be shared.
- 4.4. CPCH shall collect only as much personal information as is reasonably necessary to accomplish the purpose for which the information is collected.

5. USE AND DISCLOSURE OF PERSONAL INFORMATION

All personal information shared by CPCH's Supporters and employees with any department of CPCH is regarded as personal information shared with CPCH as an organization for CPCH's use as detailed above.

The following statement will be incorporated into CPCH forms (electronic and hard copy) for Supporters' consent:

By submitting this form, you agree that we may use this information in accordance with our privacy policy. You agree to receive emails from CPCH and understand that you may unsubscribe at any time. Paper: I agree that Canuck Place Children's Hospice may use this information in accordance with their privacy policy on canuckplace.org. I understand I can be removed from the mailing list(s) upon request.

5.1. CPCH'S OPERATIONAL USE AND DISCLOSURE

Use and Disclosure of personal information by CPCH:

- a) are limited to the least amount that is necessary to accomplish an authorized purpose;
- b) are limited to the fewest employees possible, that is, to only those who need it to accomplish an authorized purpose;
- c) are only used or disclosed for the purpose for which it was collected, or for a closely related purpose or for certain other purposes allowed under the Personal Information Protection and Electronic Documents Act (PIPEDA);
- d) shall be only in the discharge of work responsibilities and duties, and based on the need to know. This applies to all people (employees and volunteers) associated with CPCH;

- e) for a different purpose than for which it was collected is only undertaken with consent from the individual the information is about, or from someone who is authorized to act on behalf of the individual. In order to provide a safe environment for CPCH hospices, CPCH has installed security cameras throughout CPCH. We use the footage from these cameras for security, damage, and loss prevention purposes and in connection with incident investigations. In addition, we may share this footage with law enforcement in connection with a criminal investigation.

5.2. LAW ENFORCEMENT DISCLOSURE:

- a) Personal information collected and maintained by CPCH shall only be disclosed to a law enforcement agency;
- b) Requests for access to personal information by law enforcement or security services, including surveillance camera recordings not relating to criminal investigations, are required to be processed as a formal access request facilitated by the Privacy Officer;

5.3. DISCLOSURE TO THIRD-PARTY VENDORS

5.3.1. In some circumstances, CPCH uses third-party vendors for services that would not be practical or cost-effective for us to perform ourselves. Some of the services that CPCH retains a third vendor to perform include but are not limited to:

- credit card processing
- database analysis
- tele-fundraising programs
- updating our database
- mass mailings

5.3.2. In all cases, the third-party vendor is contractually bound to comply with CPCH's Privacy Policy and Procedure and to maintain the confidentiality of all personal information that CPCH provides to it.

5.3.3. The contracts with third-party vendors also require them to take reasonable precautions to protect the personal information under its control and to destroy such personal information upon completion of their services to CPCH.

5.3.4. Personal information sent between CPCH and third-party vendors is transferred using secured password-protected file transfer protocols.

5.3.5. CPCH does not sell or rent its list of Supporters and employees to any organization.

6. CONSENT

- 6.1. An individual's consent is required regarding the collection and proposed use of personal information when information is collected.
- 6.2. Consent can be either expressed orally, electronically, in writing, or implied and can be provided directly by the individual or by an authorized representative.
- 6.3. Implied consent is consent that can reasonably be inferred from an individual's action or inaction.
- 6.4. An individual's consent is required before confidential information is released to outside parties.
- 6.5. An individual is deemed to consent to the collection, use or disclosure of personal information about the individual by an organization for a particular purpose if:
 - a) the individual, without actually giving the consent referred to in subsection (1), voluntarily provides the information to the organization for that purpose; and
 - b) it is reasonable that a person would voluntarily provide that information. Personal Information Protection and Electronic Documents Act BC (PIPEDA BC)
- 6.6. IMPLIED CONSENT:
 - 6.6.1. Implied consent is consent that is inferred from signs, actions, or facts, or by inaction or silence. It is an unwritten consent to disclose confidential information because it is required by the professional relationship (e.g. disclosure to employees) or because the matter requires it (e.g. disclosure in pleadings and other documents filed with the court).
 - 6.6.2. Implied consent differs from express consent, which is communicated by the spoken or written word. When a Supporter provides personal information to CPCH, they are consenting to CPCH's collection, use and disclosure of their personal information in accordance with this Privacy Procedure. A Supporter is able to refuse or withdraw their consent to the collection, use or disclosure of their personal information at any time by contacting our Privacy Officer. We will act on such requests promptly.

7. PROTECTION OF PERSONAL INFORMATION

- 7.1. Personal information shall be protected by CPCH during its collection, access, use, disclosure, retention, storage, transportation, transmission, transfer, and during its destruction.
- 7.2. All CPCH employees and volunteers are responsible for protecting personal information that is collected, heard, handled, viewed, or processed in the discharge of their duties and responsibilities with CPCH.

- 7.3. All CPCH employees and volunteers who are dealing with personal information in any manner shall take all reasonable precautions to protect the personal information from fire, theft, vandalism, deterioration, accidental destruction or loss, and any other hazards.
- 7.4. Reasonable administrative, technical, and physical safeguards shall be taken by CPCH to ensure the confidentiality, integrity, and security of personal information, and to prevent the unauthorized collection, access, use, disclosure, transport, transmission, transfer, and destruction of personal information.
- 7.4.1. Administrative safeguards include, but are not limited to, training, contracts containing appropriate protective clauses, security clearances, designated and restricted access to certain records, offices or areas, and sanctions.
- 7.4.2. Electronic safeguards include, but are not limited to, the use of passwords, defined and restricted electronic access, encryption, and firewalls.
- 7.4.3. Physical security safeguards include, but are not limited to, locked offices, locked filing cabinets, lock-boxes, and other barriers separating the personal information from those who do not need, and should not have, access to the information.
- 7.5. To protect the privacy of personal Information, CPCH employees and volunteers should not discuss others' personal information (in their absence) in the presence of those who are not entitled to such information. Personal information should not be discussed in public places.
- 7.6. Personal information stored in electronic form on a fixed computer server or terminal shall be properly secured from unauthorized access. Personal information stored on electronic media and mobile devices shall be kept in a secured place at all times and shall be used only by authorized personnel having access to a protected system.
- 7.7. Personal information can only be removed from CPCH premises/systems for an authorized and approved purpose. If authorized to remove personal information from CPCH premises, security precautions must be taken, including the following:
- a) all personal information moved from a secure location shall be recorded in a tracking system;
 - b) only the least possible personal information necessary to accomplish the task may be removed, and
 - c) personal information should be secured according to these procedures.

8. RETENTION AND DISPOSAL OF PERSONAL INFORMATION

- 8.1. CPCH retains personal information only for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws.

8.2. When personal information is no longer:

- necessary or relevant for the identified purposes;
- required to be retained by applicable laws, or
- required to enable CPCH to maintain a robust database of current and past Supporters of CPCH,

CPCH will take steps to have such personal information deleted, destroyed, erased, aggregated, or made anonymous.

8.3. CPCH uses reasonable business practices to ensure that we have appropriate processes relating to information security and policies with respect to records retention and destruction with respect to all personal information under our control.

8.4. All personal information collected or maintained by CPCH will be retained only as long as reasonably required for authorized purposes.

8.5. Personal information will be maintained in a secure environment and will be protected by administrative, technical, physical, and electronic safeguards that are appropriate to the sensitivity of the information.

9. ACCURACY

9.1. CPCH takes reasonable steps to ensure that personal information that it maintains about Supporters and employees is accurate, complete, and up to date.

9.2. If a Supporter becomes aware that any personal information under our control about them is not correct, they should contact our Donor Services donorservices@canuckplace.org (604.731.4847) or our Privacy Officer.

9.3. CORRECTION OF INFORMATION: CPCH shall ensure the right of individuals to request, and make corrections to their personal information.

9.3.1. When an individual makes a request for correction of their personal information, CPCH shall review the record and if the existing information is inaccurate or incomplete, make the correction.

9.3.2. CPCH shall notify, where practicable, any other organization or Third-Party to whom the personal information has been disclosed within the past year that the correction was made or the request for correction has been added to the record.

9.3.3. No fees are charged for the correction of personal information.

10. ACCESS

- 10.1. Supporters and employees are entitled to a copy of the personal information that CPCH has under our control about them; if they would like a copy of such information, they are required to contact the Privacy Officer.
- 10.2. CPCH will take reasonable steps to verify their identity before granting access or making corrections. In addition, their right to access or correct their personal information is subject to certain legal restrictions.

11. BREACH OF PRIVACY

- 11.1. A breach of privacy occurs when personal information is collected, accessed, used, disclosed, transported, transmitted, transferred or destroyed other than as authorized, or when the accuracy, confidentiality or integrity of the information is compromised. Breaches may include, but are not limited to, the viewing of confidential information by unauthorized individuals, the access, theft or loss of records, and the unauthorized destruction of such information by deliberate means or by human or natural accident.
- 11.2. Any CPCH employee or volunteer, who becomes aware of a possible or actual breach of privacy, shall immediately report the possible or actual breach of privacy to the Privacy Officer, who shall take immediate steps to contain the Breach.
- 11.3. All breaches of privacy will be investigated.
- 11.4. The Privacy Officer will make recommendations for immediate and long-term corrective measures as necessary to protect the confidentiality, integrity and security of all personal information.
- 11.5. If it is determined that a breach of privacy has occurred, appropriate remedial action shall be taken by CPCH. Such action may include disciplinary action, which will be implemented pursuant to and in accordance with the relevant CPCH policies.
- 11.6. The Privacy Officer will act as a resource for all employees or volunteers of CPCH regarding appropriate action to be taken following a breach of privacy.

CONTACT US

If a Supporter has any questions about our privacy or security practices, if they would like to request access to or correction of their personal information, or if they would like to opt out of receiving communications from CPCH in the future, they should please contact our Privacy Officer by mail, telephone or email:

Canuck Place Children's Hospice
Attention: Privacy Officer
1690 Matthews Avenue, Vancouver, BC V6J 2T2
privacy@canuckplace.org
604.731.4847

Appendix A: Compliance with 10 PIPEDA Governing Principles

We will respect and protect the privacy of our donors', customers', and members' personal information by ensuring compliance with the following ten PIPEDA governing principles. It should be noted that though PIPEDA does not apply to employees' and volunteers' information, CPCH has chosen to be guided by PIPEDA's governing principles in its handling of such information.

1. ACCOUNTABILITY

We will develop guidance that will assist staff members in responding to questions from volunteers, members, donors, and customers about CPCH's Privacy Policy and Procedure Program.

The Privacy Officer has the responsibility to ensure that all governing principles are followed with respect to members', donors', customers', employees', and volunteers' personal information.

The Privacy Officer will train CPCH staff and keep them informed, so that they:

- a) can either respond to inquiries about CPCH's privacy policies and practices themselves or refer inquirers to the Privacy Officer or another authorized representative;
- b) can explain CPCH's purposes for collecting personal information;
- c) understand CPCH's policy and procedures on consent and can obtain consent as appropriate;
- d) explain to volunteers, members, donors, and customers when and how they may withdraw consent and what consequences if any may come of such withdrawal;
- e) can recognize and process requests for access to personal information;
- f) can refer complaints about privacy matters to the Privacy Officer; and
- g) are up to date on CPCH's ongoing activities and new initiatives relating to the protection of personal information.

The Privacy Officer, in conjunction with other CPCH departments, will develop and implement a system to monitor CPCH's compliance with PIPEDA with respect to information collected in the process of conducting commercial activities on an ongoing basis, and will keep CPCH employees informed of new privacy issues raised by technological changes, internal reviews, public complaints, and decisions of the courts.

We will verify that third-parties have privacy controls stated in any contractual agreements, and have implemented them accordingly.

2. IDENTIFYING PURPOSE

When collecting personal information from donors, employees, and volunteers we will ensure that the purpose for collecting this information is clear, reasonable, and limited to only the information required.

3. CONSENT

We will seek informed consent from donors, employees, and volunteers for the collection of their personal information as required, by advising of the purposes for which their personal information will be used or disclosed. Individuals may withdraw their consent at any time, subject to legal or contractual restrictions and reasonable notice. Through the establishment of clear policies, procedures and training, we will ensure that all employees who collect personal information understand the process and can implement the procedures consistently.

4. LIMITING COLLECTION

We will collect the minimum information necessary for the identified purposes;

Staff will be trained to understand and respect limitations on collecting personal information.

5. LIMITING USE, DISCLOSURE AND RETENTION

We will ensure not to use or disclose the personal information of donors, employees, or volunteers for purposes beyond those for which it was collected, except with the consent of the individual or as required by law. Any new purpose that is conceived after the collection of personal information will be documented and we will seek consent.

6. ACCURACY

We will take measures to ensure that the personal information collected from donors, employees, and volunteers is accurate, complete and up-to-date and only being used for the purpose(s) for which it was collected.

7. SAFEGUARDS

We will use the appropriate level of protection through physical, technical, and administrative safeguards to protect employee, volunteer, and donors' personal information against loss, theft, unauthorized access, disclosure, copying, use, or modification.

The Privacy Officer will train staff so that all who collect personal information will be aware of the importance of maintaining the confidentiality of personal information, including during the process of disposal or destruction of information.

Access to personal information will be on a "need to know basis" as required to perform defined job functions. Only those authorized to access and handle employee, volunteer, and donors' personal information held by CPCH will be allowed to do so.

Employees will be subject to "Code of Ethics/Confidentiality Agreement."

We will implement and adhere to information security policies and procedure, including appropriate safeguards for all uses of personal information while teleworking outside of the office.

Personal information will be transmitted through secure means.

8. OPENNESS

The Privacy Officer, will address questions or complaints from donors, employees, and volunteers regarding the handling of their personal information.

9. INDIVIDUAL ACCESS

On request, information will be provided at minimal to no cost to donors, employees, and volunteers, and in a format, which is legible and will provide an explanation of abbreviations or codes.

When the accuracy of personal information is challenged, we will amend the information when a donor, employee, or volunteer demonstrates that it is inaccurate or incomplete.

10. CHALLENGING COMPLIANCE

The Privacy Officer will investigate all complaints received from donors, employees, and volunteers regarding the handling of their personal information.

When complaints are substantiated the Privacy Officer will ensure that CPCH's actions are modified to minimize the likelihood of a reoccurrence.