Privacy Policy		
Related Procedure: N/A		
Originating Directorate/Sector: Vice-President, Operations		Creation Date: 2020/05/01
Policy: ☑ New ☐ Revised (changes) ☐ Revie	wed (no changes)	Revision/Review Date: 2020/09/27
Key Words: Privacy, Information, Consent, Disclosure, Confidentiality		
Approved by: ☐ Audit and Finance Committee ☐ Human Resources Committee ☐ Investment Committee ☐ Nominating and Governance Committee ☐ Board of Directors Date: 2020/09/24		
Site Specific: ⊠ No □ Yes, site:	Distributed to: ☐ Staff ☐ Director/Manager ☐ Other: Available online: ☑ Yes ☐ No	
Summary: The McGill University Health Centre Foundation is committed to protecting the privacy of its donors, prospective donors, board members, volunteers and employees. It values the trust of those whom it serves and recognizes that it earns such trust by being transparent and accountable in how it treats confidential information.		

1. PURPOSE

The McGill University Health Centre Foundation (the "Foundation") collects and uses certain personal information about donors and potential donors, including, without limitation, names, titles, addresses, telephone numbers, past donations and other relevant information. The Foundation uses this information only for the purposes of processing donations, keeping donors informed about the activities of the Foundation, providing donors with appropriate recognition and stewardship and to ask for support of the mission of the Foundation.

The Foundation may also collect information that donors provide to the Foundation about their interests and other related matters, in order to help achieve donors' philanthropic goals.

Personal information collected by the Foundation is kept in confidence and is only disclosed to meet the purposes stated above. The employees, directors, other volunteers and suppliers of the Foundation sign confidentiality agreements, and the Foundation ensures that additional safeguards are put in place in order to ensure that confidential information is not accessed, disclosed or shared more widely than is necessary to achieve the purpose for which it was gathered, and always in accordance with applicable law.

The Foundation does not sell, rent or trade mailing lists or other personal information.

2. POLICY

In order to ensure individual privacy is protected, the Foundation instituted the privacy policy set forth in this document (the "Policy"), which reflects the following ten guiding principles recommended by the Personal Information Protection and Electronic Documents Act (Canada):

- I. **Accountability:** The Foundation is responsible for the personal information it holds and uses for fundraising purposes. It has designated an individual, the Foundation's Privacy Officer, to be accountable for compliance with the Policy.
- II. **Identifying Purpose:** The Foundation collects, uses and discloses personal information only for the purpose of processing donations, keeping donors informed about the activities of the Foundation and to build support around the Foundation's mission.
- III. Consent: The Foundation offers donors and prospective donors numerous privacy options, including the option to limit or opt out of future contact. Discharged McGill University Health Centre patients who do not opt out may receive correspondence from the McGill University Health Centre, soliciting financial support for the mission of the McGill University Health Centre. Patients who choose to contribute to the Foundation in response to this solicitation give implied consent for their contact information to be provided to the Foundation. Any donor may opt out of receiving future communications from the Foundation by contacting the Foundation info@muhcfoundation.com, at 514-843-1543 or at 5100 de Maisonneuve Blvd. West, Suite 700, Montreal, Quebec H4A 3T2.
- IV. **Limiting Collection:** Employees, volunteers or agents of the Foundation collect information necessary for the purpose of a particular fundraising program or event. Such information will only be used for the purpose for which it was gathered. The Foundation does not have access to patients' medical information. Other personal information may be gathered from donors and prospective supporters to assist the Foundation with facilitating gifts to specific medical programs.
- V. **Limiting Use, Disclosure and Retention:** The Foundation has put safeguards in place to ensure that information collected by the Foundation is not accessed, disclosed or shared inappropriately. Information is kept by the Foundation only as long as is necessary for the original purpose for which it was collected, or to comply with Canada Revenue Agency guidelines or applicable law.
- VI. **Record Maintenance:** The Foundation maintains personal information as necessary for the processing of receipts and the dispersal of fundraising, program or special event materials. Material recording personal information will be disposed of in a manner which ensures the security of personal information.
- VII. **Safeguarding Personal Information:** The Foundation will protect donor information on file by safeguarding access to this information. Only those who need access to the information to process receipting or inquiries or to further the fundraising mission of the Foundation will be provided with limited access.

Furthermore, access to the Foundation offices is limited, and employee computer desktops are locked when not in use and have security passwords or keys for access so that others cannot browse databases when the Foundation personnel are away from desks or from the office. All personnel of the Foundation agree to conduct their day-to-day business to ensure the confidentiality of each gift, request, inquiry, acknowledgement or recognition event with which they are involved.

- VIII. Openness: The Foundation will provide donors and the public with the Policy upon request.
- IX. **Access:** Individuals can request access to their personal information and, within 30 days of such a request, the Foundation will respond to such request. Individuals have the right to ensure the information is accurate and to complete and amend the file if necessary.
- X. Challenging Compliance: If anyone is concerned about the Foundation's compliance with the Policy, such person can contact the Foundation at info@muhcfoundation.com, at 514-843-1543 or at 5100 de Maisonneuve Blvd. West, Suite 700, Montreal, Quebec H4A 3T2. Any complaint made to the Foundation will be addressed within 60 days, once all relevant parties have been interviewed, unless additional time is required to process such complaint. If a complaint identifies a gap in compliance, the Foundation will take all necessary steps to remedy such situation.