



ROYAL ALEXANDRA HOSPITAL FOUNDATION – PRIVACY POLICY

1. INTRODUCTION

- 1.1 The Royal Alexandra Hospital Foundation (the “**Foundation**”) is committed to safeguarding the personal information provided to us by our donors, volunteers and employees (“**Personal Information**”). The Foundation manages all Personal Information under its custody or control in accordance with Alberta’s *Personal Information Protection Act* (“**PIPA**”) and any other applicable laws. The purpose of this Privacy Policy is to provide an outline of the principles and practices which the Foundation follows in order to protect the Personal Information of its donors, volunteers and employees.
- 1.2 This Privacy Policy applies to the Foundation and its subsidiaries, and any persons providing services on its behalf, whether as employees, contractors or volunteers.
- 1.3 “Personal Information” in this Privacy Policy means information about an identifiable individual, including, but not limited to, an individual’s name, home address, e-mail address, phone number, age, sex, marital status, financial information, educational history, identifying numbers, physical description and other identifying information.
- 1.4 The Foundation only collects Personal Information that is needed for the purposes of providing its services, and typically collects Personal Information directly from donors, volunteers or employees, unless otherwise required or permitted by law.
- 1.5 This Privacy Policy also applies to Personal Information about a potential, current or former employee of the Foundation that is required for the purposes of establishing, managing or terminating an employment relationship, or managing a post-employment relationship (“**Personal Employee Information**”).

2. ACCOUNTABILITY

- 2.1 The Foundation is responsible for any Personal Information under its custody and control, including Personal Information which has been transferred to a third party.
- 2.2 The Foundation has designated a privacy officer who is responsible for ensuring that the Foundation complies with this Privacy Policy and applicable legislation (the “**Privacy Officer**”).
- 2.3 The Foundation has implemented certain policies and practices under this Privacy Policy to ensure compliance with this Privacy Policy and applicable legislation.

3. CONSENT

- 3.1 The Foundation will not collect, use or disclose a donor, volunteer or employee’s Personal Information without that individual’s consent, subject to sections 3.4, 4.4 and 5.3 of this Privacy Policy.
- 3.2 Donors, volunteers or employees may provide such consent orally or in writing. Consent may be deemed to have been provided for a particular purpose, where the donor,

volunteer or employee volunteers Personal Information for that purpose, and it is reasonable that someone would voluntarily provide that Personal Information.

- 3.3 Donors, volunteers and employees may withdraw or vary their consent at any time, upon providing reasonable notice to the Foundation. The Foundation may inform a donor, volunteer or employee of the potential consequences of withdrawing or varying consent which are not reasonably obvious.
- 3.4 The Foundation may collect, use or disclose Personal Information without a donor, volunteer or employee's consent where required or permitted at law, including, but not limited to, the following circumstances:
 - (a) A reasonable person would consider that the collection, use or disclosure of the Personal Information is clearly in the donor, volunteer or employee's interests, and consent cannot be obtained in a timely manner, or the donor, volunteer or employee would not reasonably be expected to withhold consent;
 - (b) The collection, use or disclosure is authorized by a statute or regulation of Alberta or Canada;
 - (c) The collection, use or disclosure is reasonable for the purposes of an investigation or legal proceeding;
 - (d) The Personal Information is publicly available according to *PIPA* (e.g. The Personal Information is available in a public telephone directory); or
 - (e) The collection, use or disclosure is necessary in order to collect a debt owed to the Foundation.

4. **COLLECTION OF PERSONAL INFORMATION**

- 4.1 The Foundation will only collect Personal Information for purposes which are reasonable, and only to the extent that is reasonable for meeting those purposes.
- 4.2 Without limiting the right to collection, use or disclosure of Personal Information as described in 3.4 herein, before or at the time of collecting any Personal Information from a donor, volunteer or employee, the Foundation will provide oral or written notice of the purposes for which the Personal Information is being collected, and the name, position name or title of the Foundation's Privacy Officer or other individual who can answer questions regarding the collection.
- 4.3 Where the Foundation collects Personal Information about a donor, volunteer or employee from another organization without the individual's consent, the Foundation will provide the other organization, before or at the time of the collection, with sufficient information regarding the purposes of the collection so that the other organization can determine whether disclosing the Personal Information to the Foundation would comply with *PIPA*. The Foundation may not provide notice where the donor, volunteer or employee is deemed to have provided consent pursuant to section 3.2 of this Privacy Policy.
- 4.4 The Foundation may collect Personal Employee Information without an employee's consent for the purposes of establishing, managing or terminating an employment relationship, or managing a post-employment relationship, where the collection is reasonable for those purposes.

4.5 Without limiting the right to collection, use or disclosure of Personal Information as described in 3.4 herein, before or at the time of collecting any Personal Employee Information for a purpose other than as is referred to in section 4.4 of this Privacy Policy, the Foundation will provide the employee oral or written notice of the purposes for which the Personal Information is being collected, and the name, position name or title of the Foundation's Privacy Officer or other individual who can answer questions regarding the collection.

5. **USE & DISCLOSURE OF PERSONAL INFORMATION**

5.1 The Foundation will only use or disclose Personal Information for purposes which are reasonable, and only to the extent that is reasonable for meeting those purposes.

5.2 The Foundation may use or disclose Personal Employee Information without an employee's consent for the purposes of establishing, managing or terminating an employment relationship, or managing a post-employment relationship, where the use or disclosure is reasonable for those purposes.

5.3 The Foundation may also disclose Personal Employee Information of a current or former employee to another potential or current employer without that employee's consent, where it would be reasonable for assisting with the determination of that employee's eligibility or suitability for a position with that employer.

6. **ACCESS & CORRECTIONS TO PERSONAL INFORMATION**

6.1 Donors, volunteers and employees of the Foundation have a right of access to their own Personal Information contained in any records under the custody or control of the Foundation, subject to sections 6.4 and 6.5 of this Privacy Policy and applicable legislation.

6.2 A donor, volunteer or employee may request the Foundation to:

- (a) Provide the donor, volunteer or employee with access to his or her Personal Information, and information about the use or disclosure of that Personal Information; or
- (b) Correct an error or omission in the donor, volunteer or employee's Personal Information.

6.3 A request made pursuant to section 6.2 of this Privacy Policy must be in writing, and must include sufficient information to allow the Foundation to identify the requested information using reasonable efforts. Requests under section 6.2 may be made to the Foundation's Privacy Officer, pursuant to section 8.1 of this Privacy Policy.

6.4 The Foundation may refuse a donor, volunteer or employee's request for access to his or her Personal Information in certain circumstances, including, but not limited to, the following:

- (a) The Personal Information is protected by legal privilege;
- (b) The disclosure of that Personal Information would reveal confidential commercial information, and it would not be unreasonable for the Foundation to withhold that information; or

- (c) The Personal Information was collected for an investigation or legal proceeding.
- 6.5 The Foundation must refuse a donor, volunteer or employee's request for access to his or her Personal Information in certain circumstances, including, but not limited to, the following:
 - (a) The disclosure could reasonably be expected to threaten the life or security of another individual; or
 - (b) The disclosure would reveal Personal Information about another individual.
- 6.6 The Foundation will make every reasonable effort to assist donors, volunteers or employees making requests under section 6.2 of this Privacy Policy, and to respond to such requests as accurately and completely as reasonably possible.
- 6.7 The Foundation will respond to a request made under section 6.2 of this Privacy Policy within 45 days from receiving the written request, unless an extension is granted by the Information and Privacy Commissioner (the "**Commissioner**"). The Foundation will inform the donor, volunteer or employee of the reasons for any such extension.
- 6.8 The Foundation may charge a reasonable access fee to a donor, volunteer or employee who makes a request pursuant to section 6.2(a) of this Privacy Policy, and will provide that donor, volunteer or employee with a written estimate of any such fees before providing the service.
- 6.9 The Foundation will not charge an access fee in respect of a request made by an employee for Personal Employee Information under section 6.2(a) of this Privacy Policy.

7. **CARE OF PERSONAL INFORMATION**

- 7.1 The Foundation will use reasonable efforts to ensure that the Personal Information it collects, uses or discloses is as accurate and complete as is necessary for its purposes.
- 7.2 The Foundation will implement reasonable security measures to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal, destruction or other risks to Personal Information under its custody or control.
- 7.3 The Foundation will, without unreasonable delay, provide notice to the Commissioner of any loss, unauthorized access to or disclosure of a donor, volunteer or employee's Personal Information, where a reasonable person would consider that there is a real risk of significant harm to the donor, volunteer or employee as a result. Notwithstanding the foregoing, the Foundation may provide such notice in the event of unauthorized access, even if there is not real risk of harm.
- 7.4 The Foundation will only retain a donor, volunteer or employee's Personal Information for as long as it reasonably requires for legal or business purposes, after which the Foundation will either destroy the records containing the Personal Information or render the Personal Information non-identifying.

8. **QUESTIONS & COMPLAINTS**

- 8.1 Donors, volunteers or employees who have questions or complaints concerning the collection, use or disclosure of Personal Information by the Foundation, or regarding a

request for access to their own Personal Information, may contact the Foundation's Privacy Officer:

Royal Alexandra Hospital Foundation
10240 Kingsway NW
Edmonton AB T5H 3V9
Phone: 780.735.4723
Fax: 780.735.4016
Email: foundation@royalalex.org
Attn: Privacy Officer

- 8.2 If a donor or employee is not satisfied with the response provided by the Privacy Officer, a written complaint may be filed with the Commissioner within 30 days of the Privacy Officer's response, at the following addresses:

Edmonton

Office of the Information and Privacy
Commissioner
Suite 410, 9925 109 Street NW
Edmonton, AB T5K 2J8
Phone: 780.422.6860
Toll Free: 1.888.878.4044
Fax: 780.422.5682
Email: generalinfo@oipc.ab.ca
Website: www.oipc.ab.ca

Calgary

Office of the Information and Privacy
Commissioner
Suite 2460, 801 - 6 Avenue SW
Calgary, AB T2P 3W2
Phone: 403.297.2728
Toll Free: 1.888.878.4044
Fax: 403.297.2711
Email: generalinfo@oipc.ab.ca
Website: www.oipc.ab.ca