



TITLE: Privacy Policy	SPONSOR: President & CEO
Date Issued: July 2004	Date To Be Reviewed By: March 2026
Distribution: All Staff & Volunteers	Issuing Authority: Board of Directors

POLICY OBJECTIVE

The QEII Foundation (the “Foundation”) recognizes its obligations to respect privacy and is committed to protecting the privacy of the Personal Information of its employees, volunteers, donors, potential supporters and other stakeholders. The Foundation values the trust of those with whom it deals, and of the public, and recognizes that maintaining this trust requires that the Foundation be transparent and accountable in how the information that is shared with the Foundation is treated. This policy meets all legislative requirements with respect to privacy and applies to all employees, volunteers, and Board Directors of the Foundation.

DEFINITIONS

Personal Information: Information about an identifiable individual, but does not include the name, title or business address, email, or telephone number of an employee of an organization.

GUIDING PRINCIPLES AND VALUES

The Foundation is committed to protecting the privacy of all Personal Information it collects, whether from employees, donors, volunteers, or other stakeholders. The Foundation adheres to a Donor Bill of Rights which commits to the handling of Personal Information with respect and confidentiality. The Foundation recognizes that in limited circumstances it must ensure such protection is up to the standards required by the Personal Information Protection and Electronic Documents Act (PIPEDA).

POLICY

All information regarding employees, donors, volunteers, and other stakeholders of the QEII Foundation is kept in the strictest confidence by the Foundation, and will not be disclosed and/or sold, leased, or traded to anyone. The information will only be used by the Foundation for the purpose for which it was collected as disclosed to the individual. The Foundation has adopted the Principles set out in the Canadian Standards Association's "Model Code for the Protection of Personal Information".

PROCEDURE

1. Accountability for Personal Information

Information and Personal Information become part of the Foundation's database and files system when individuals have made a donation or participated in a Foundation program or event. However, names, addresses and telephone numbers which are published in telephone directories or other public records and are not considered personal may be used to acquire new donors for support. The Foundation does not have access to patient records and medical information within the QEII or any part of Nova Scotia Health (NSH). However with the express consent of the patient, NSH may share a patient's name and contact information only for the purposes of having the Foundation contact the individual to provide information about its activities, events and fundraising opportunities.

Personal Information may have occasion to be transferred to a third party for processing. The Foundation shall use contractual or other means to provide a comparable level of protection while the Personal Information is being processed by a third party.

2. Identifying Purposes for the Collection of Personal Information

The Personal Information collected at the time of a donation is collected for the following purposes:

- To comply with Canada Revenue Agency requirements, including issues tax receipts;
- To provide donors with periodic stewardship information;
- To provide donors with appropriate recognition by the Foundation and QEII;
- To provide donors and potential supporters with information about QEII and Foundation activities, and
- To promote opportunities where donors and potential supporters may support the Foundation.

The name and contact information shared by NSH is collected for the following purposes:

- To initiate contact with potential supporters who provided express consent to be

- contacted,
- To provide potential supporters with information about QEII and Foundation activities and events, and
- To promote opportunities where potential supporters may support the Foundation.

*Personal information may have occasion to be transferred to a third party for processing. The Foundation shall use contractual or other means to provide a comparable level of protection while the personal information is being processed by a third party.

The Personal Information collected from volunteers is collected for the following purposes:

- For the purposes of recruiting volunteers and establishing and managing an effective volunteer program
- For information related to the volunteer's services, including availability, schedule, duties, reviews, and related notes and memorandums and documentation related to volunteer qualifications (professional or technical qualifications)
- To provide potential supporters with information about the QEII and Foundation activities, and
- To promote opportunities where potential supporters may support the Foundation.

The Foundation collects, uses and administers personal information with an employee's consent for the purposes of establishing, managing and terminating the employment relationship (see list below). Employees will have access to their personal information and be able to challenge the accuracy and completeness of it.

- Personal information collected, used and disclosed in the hiring process, including information on resumes and application forms (contact information, personal and professional history, qualifications, emergency contact information) results of criminal records checks, information collected from references;
- payroll and related information including, social insurance number, rate of pay, hours of work deductions, bank account information, any court orders;
- benefit information including, premiums or contributions, coverage;
- information, date of birth, marital status, dependent information, medical documentation for the purposes of administering leave programs, return to work processes, and benefit administration;
- performance information, including work history, performance reviews, discipline and related notes and memorandums, documentation related to job qualifications (professional or technical qualifications), internal competition information;

3. Limiting Collection of Personal Information

The Foundation collects a limited amount of Personal Information about its employees, donors and potential supporters. The collection of Personal Information is limited to that which is necessary for the purposes identified by the Foundation. Information will be collected by fair and lawful means. The Foundation does not collect information about a person's health, other than that which may be volunteered by an individual.

The Foundation gathers information about visits to the Foundation website for statistical analysis (number of visits, time spent on pages, etc.). Information collected will be used to improve the content and design of the website. Statistical information is not related to a particular individual.

The Foundation also collects analytical information, specifically user demographics and online behaviour, relevant to the Foundation website, as well as remarketing information to assist in connecting with potential donors and online development. Remarketing information is provided to the Foundation by Google Analytics and contains information based on a user's online activity, demographics and tracking. Such information is not linked to an identifiable individual. A specific policy on this provided on the Foundation website and is attached hereto as Appendix A. Users can opt out of Google Analytics.

All information stored on Foundation servers and technology are saved for the required period of time, and could be accessed at any time.

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

In obtaining consent for the collection, use and/or disclosure of Personal Information, the reasonable expectations of the individual are relevant. For example, the Foundation can assume that an individual's donation constitutes consent for specific purposes, such as the issuance of an income tax receipt, or subscription to the Foundation's email list constitutes consent for sending marketing materials (there is an option to opt out). However, an individual would not reasonably expect that Personal Information given to the Foundation would be given to another fundraising organization.

The form of consent sought by the Foundation may vary, depending on the circumstances and the type of Personal Information collected. In determining the form of consent to use, the Foundation will take into account the sensitivity of the Personal Information. The Foundation will generally seek express consent when the Personal Information is likely to be considered sensitive. Implied consent would generally be appropriate when the Personal Information is less sensitive. An authorized representative such as a substitute decision maker if the donor is not capable, a legal guardian or a person having power of attorney can also give consent.

Note: In certain circumstances Personal Information can be collected, used, or disclosed without the knowledge and consent of the individual. For example, legal or security reasons may make it impossible or impractical to seek consent. When information is being collected

for the detection and prevention of fraud or for law enforcement, seeking the consent of the individual might defeat the purpose of collecting the information. In addition, if the Foundation does not have a direct relationship with the individual, it may not be possible to seek consent.

Periodic mailings or e-mails on QEII Foundation's services or events may be sent to individuals. If individuals do not wish to receive these printed materials or emails, they can inform the Foundation by unsubscribing to emails, placing a phone call or in writing.

Individuals, who supply telephone numbers on-line, by phone or by mail, may receive telephone contact from us if they have requested further information. If individuals do not wish to receive these calls, they can inform the Foundation by sending an email, placing a phone call or in writing.

Whenever an individual withdraws their consent for the use of their Personal Information the Foundation will ensure all future contact is limited or discontinued according to the instruction of the individual.

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

Personal Information will 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 will be retained only as long as necessary for the fulfillment of those Foundation purposes.

If using Personal Information for a new purpose, the Foundation will document this purpose and seek consent for such use and/or disclosure.

The Foundation has developed guidelines and implemented procedures with respect to the retention of Personal Information. Personal Information may be retained . The Foundation is subject to legislative requirements with respect to retention periods, therefore all information is retained for a minimum of seven years, with the exception of any information originating from NSH, which is retained, returned and/or destroyed in accordance with NSH policies and any information sharing agreements between the Foundation and NSH.

The Foundation respects all requests for anonymity and will further limit disclosure accordingly in such circumstances.

6. Accuracy of Personal Information

Personal Information will be kept as accurate, complete, and up to date as is necessary for the purposes for which it is to be used and/or disclosed.

The extent to which Personal Information will be kept accurate, complete, and up to date will depend upon the use/disclosure of the Personal Information, taking into account the interests of the individual. Personal Information will be sufficiently accurate, complete, and up to date to minimize the possibility that inappropriate Personal Information may be used to make a decision about the individual.

The Foundation will not routinely update Personal Information, unless such a process is necessary to fulfill the purposes for which the Personal Information was collected.

7. Safeguards for Personal Information

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

Personal Information of donors (including title, name, address, telephone number, email address, giving history) is stored in a password protected database and manual filing system within the confines of the Foundation offices. Further, access is limited to a “need to know” basis.

All staff members agree to a confidentiality clause as part of their employment contract. Staff members with access to an NSH hospital or any information originating from the NSH are also required to sign the NSH’s Confidentiality Pledge. In addition, volunteers with access to Personal Information must sign a Foundation Volunteer Confidentiality Agreement.

Website- All Personal Information provided by Foundation website visitors and donors is secure information. In order to prevent unauthorized access and ensure proper use of information, the Foundation uses password protocols and encryption software to protect personal and other information received when a donation is made online. The Foundation’s software is routinely updated to maximize protection of such information.

The Foundation has a Privacy Officer who oversees compliance with this Policy and acts as the primary contact person on information privacy matters. The Privacy Officer’s contact information is provided at the bottom of this document.

8. Openness Concerning Policies and Practices

The Foundation regularly reviews its privacy practices for various activities and updates this Privacy Policy at least every three years or as needed. The Foundation website will contain the most up-to-date practices/policy (see information below).

9. Individual access to one's own Personal Information

Upon request, an individual will be informed of the existence at, use, or disclosure of Personal Information by the Foundation. Individuals may access Personal Information at any time to ensure that it is correct and current or to edit if so desired.

Note: In certain situations, the Foundation may not be able to provide access to all of the Personal Information that it holds about an individual. Exceptions to the access requirement will be limited and specific. The reasons for denying access will be provided to the individual upon request. Exceptions may include Personal Information that is prohibitively costly to provide, information that contains references to, or Personal Information about, other individuals, information that cannot be disclosed for legal, security, or proprietary reasons, and information that is subject to solicitor-client or litigation privilege.

10. Challenging Compliance

Questions, concerns or complaints relating to the Foundation's Privacy Policy on the treatment of Personal Information should be addressed to the Privacy Officer. All complaints will be addressed under the Foundation's Complaints Policy and will be part of an annual report to the Board of Trustees.

RELATED DOCUMENTS/POLICIES

HISTORICAL DATES

July 2004 – Issued

January 2017- addition of third paragraph to section 3 of the Procedure.

January 2019 – to update Google Analytics policy for demographic tracking, amend wording to allow for Patient Consent to Contact through QEII Kiosks, update Privacy Officer information.

February 2023 – addition of language to NSH information sharing for third party processing, re-formatting.

Appendix A: Google Analytics, Ad Words and Cookie Policy

By accessing the QEII Foundation website, you are consenting to the use of cookies, Google Analytics (including remarketing, Display Network Impression Reporting, and Demographics and Interest Reporting features), as well as and other supporting features.

This policy helps to explain the occasions when and why cookies may be sent to visitors to the website (referred to in this policy as “we”, “us” or “our”). “Cookies” are text-only pieces of information that a website transfers to an individual’s website-browsing equipment for record-keeping purposes. Cookies allow the website to remember important information that will make your use of the site more convenient. A cookie will typically contain the name of the domain from which the cookie has come, the “lifetime” of the cookie, and a randomly generated unique number or other value. Certain cookies will be used on the Site regardless of whether you are logged in to your account or not. Like most websites, we use cookies for a variety of purposes in order to improve your online experience, for analytics and for marketing, but specifically we use cookies on the website for the following purposes:

1. **Analytical Purposes:** We use cookies to collect demographic and interest data for the purposes of analyzing user activity. For example, using cookies we can look at aggregate patterns like the average number of searches that users perform or estimate the age and gender of our average users. These analytical insights allow us to better target our website to user interest and improve the overall functionality and user experience of the website.
2. **Your Preferences:** We use cookies to store certain user preferences on our website. For example, we may store the recent searches you have performed in a cookie so that we can allow you to easily repeat those searches when you return to our website.
3. **Marketing:** We use cookies from third-party partners such as Google and Facebook for marketing purposes. These cookies allow us to display QEII Foundation promotional material to you on other sites you visit across the Internet. The QEII Foundation may also share information about your behavior on the website with third parties (including operators of third-party websites and/or social networking sites) in order to show you targeted advertisements and other content that has been customized for you.
4. **Referral Tracking:** We use cookies to associate user activity with the third party website that referred the user to our website, or to associate user activity that the QEII Foundation referred to a third party website. These third party partner websites receive credit for the activity of users they refer to our website, or give the QEII Foundation credit for the activity of users referred to such third party websites. We do not share any personal information or information about individual user activities with these partner entities.

Session cookies are temporary cookies that remain in the cookie file of your browser until you leave the website.

Persistent cookies remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie). When we use session cookies to track the total number of visitors to our website, this is done on an anonymous basis (as cookies do not in themselves carry any personal data). We may also employ cookies so that we remember your computer when it is used to return to the website to help customize your web experience. We may associate personal information with a cookie file in those instances. Use the options in your web browser if you do not wish to receive a cookie or if you wish to set your browser to notify you when you receive a cookie. You can easily delete any cookies that have been installed in the cookie folder of your browser.

Please check your browser's cookie settings support pages to confirm the most up-to-date instructions on how to modify your cookie settings.

The QEII Foundation implements Google Analytics tracking to gather information from users using the aforementioned Cookies for analytical, marketing, referral tracking and reporting. Your information will not be sold to any 3rd party vendor or service. The QEII Foundation fully adheres to Google's usage policies.

The QEII Foundation uses the AdWords and Remarketing Lists features of Google Analytics for Display Advertisers. The QEII Foundation and Google use first-party cookies (such as the Google Analytics cookie) and third-party cookies together to inform, optimize, and serve ads based on your past visits to our Website. This means that vendors including Google will display QEII Foundation promotional material on other sites you visit across the Internet.

You may opt-out of Google Analytics for Display Advertisers including AdWords and opt-out of customized Google Display Network ads by visiting the Google Ads Preferences Manager. To provide website visitors more choice on how their data is collected by Google Analytics, Google has developed an Opt-out Browser add-on, which is available by visiting Google Analytics Opt-out Browser Add-on, to enable you to opt-out of Google's programs.