

Sinai Health System Foundation Privacy Policy

Our Accountability

The Foundation has a Privacy Officer who is accountable for the Foundation's overall compliance with its privacy policy and acts as its primary contact on all privacy matters. The Privacy Officer reports to the CEO of the Foundation and can be contacted by telephone at 416-586-4800, extension 5910 or by email at SHS-Privacy-Office-Foundation@sinaihealthsystem.ca

The Privacy Officer has established a Privacy Committee that meets on an ongoing basis to deal with privacy issues as they occur, and conducts privacy audits and training sessions with Foundation staff and volunteers to ensure that practices conform to the privacy policy. Additionally, a privacy impact assessment is required for the creation of new personal information systems and for significant changes to existing information systems at the Foundation to identify potential risks to privacy.

If you wish to opt out of receiving communications from Sinai Health System Foundation, you may do so quickly and easily through our website at www.supportsinai.ca or you may contact the Privacy Officer.

Our Commitment

The Sinai Health System Foundation is committed to protecting your personal information and to upholding Canadian and international privacy principles. In the course of our fundraising activities, we frequently gather and use personal information. We value the trust placed in us by our donors and volunteers, and recognize that this trust requires us to be transparent and accountable in how we treat personal information that is shared with us.

Our privacy policy seeks to ensure that all personal information held by the Foundation will be carefully protected and will be gathered, used, retained, and disposed of in compliance with applicable federal and provincial statutes. Additionally, the Foundation recognizes and adheres to the Sinai Health System Corporate Privacy Policy. For more information on Sinai Health System corporate privacy practices, please visit www.mountsinai.on.ca or contact the SHS Corporate Privacy Officer by email at privacy@sinaihealthsystem.ca or by phone at 416-586-4800, extension 2101.

As a donor or volunteer of Sinai Health System Foundation, your right to confidentiality and privacy will be protected. **The Foundation does not give, trade, rent or sell any personal information to third parties.**

Defining personal information

"Personal Information" is any information that can be used to distinguish, identify or contact a specific individual. This includes information as to whether an individual has donated to Sinai Health System Foundation, how much has been donated and an individual's private contact information. Business contact information and certain publicly available information, such as names, addresses and telephone numbers that are published in telephone and on-line directories are not considered personal information.

Collection of personal information

The Foundation limits its collection of personal information to only specific personal information that is related directly to, and needed for, operating its programs and activities. If you make a donation, attend an event, or become a volunteer of the Foundation, we collect some basic information about you. This information allows us to:

- Process your donation and send out your charitable tax receipt, if applicable.
- Recognize your gift in our publications and/or in physical formats around the Hospital.
- Communicate with you through periodic contact in print, verbally or electronically in order to provide information about medical treatment and patient care advances, funding needs related to medical research and patient care, our programs, services, special events, opportunities to volunteer or give and more.
- Build a relationship with you, understand your needs and tailor our approach to serve you better.

The Foundation does not collect personal health information unless directly volunteered by an individual. Names and mailing addresses of Sinai Health System patients are provided by the Hospital to the Foundation for fundraising purposes; however, no personal health information is permitted to be disclosed by the Hospital or its medical staff to the Foundation.

If you are currently a Hospital patient, and wish to prevent your mailing address from being forwarded to the Foundation, please tell your Admitting Clerk or contact the Sinai Health System Privacy Officer.

Obtaining consent for *the collection of personal information*

Your consent can be expressed, deemed or implied in relation to the collection of your personal information. Expressed consent is given explicitly and can be verbal, electronic or written. Deemed consent is when the purpose for collection, use or disclosure, would be considered obvious to a reasonable person and you voluntarily provide personal information to the Foundation for that purpose. Consent is implied when it can reasonably be concluded that consent has been given by an action you've taken, or when you decide not to take an action.

The Foundation offers our donors the opportunity to opt not to have their information shared for purposes beyond those for which it was explicitly collected. To withdraw your consent, please contact the Foundation Privacy Officer at SHS-Privacy-Office-Foundation@sinaihealthsystem.ca.

Use of personal information

Your personal information will not be used or disclosed for purposes other than those for which it was collected, except with your consent or as required by law. Personal information will be retained only as long as necessary for the fulfillment of those purposes and may be disclosed to Sinai Health System to ensure the use of your gifts as they are directed. **The Foundation does not give, trade, rent or sell any personal information to third parties.**

The Foundation's web page contains online forms that allow visitors to make a donation. The credit card information provided on these forms is used only to process these donations and is not retained by the Foundation.

From time to time, we may use the personal information you provided us with to generate statistics and aggregate reports for internal use. These statistics and aggregate reports do not contain any personally identifying information, and donor identity remains anonymous.

Privacy practices

All personal information collected by the Sinai Health System Foundation is carefully protected and treated with the utmost respect. We take our commitment to your privacy seriously and remain vigilant to protect your information from error, loss and unauthorized access by means of organizational, physical, and technical measures. All online transactions conducted on our website occur through a safe, private, and secure system that protects the individual's personal information. Our computer systems that contain personal information are protected by means of encryption, firewalls, access restrictions, and passwords.

Our personnel are authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was collected. Each employee and volunteer must sign an agreement stating that maintaining confidentiality is a condition of their employment or volunteer status with the Foundation, and are required to comply with our privacy policy. All independent contractors who have a working relationship with the Foundation database are also required to sign a confidentiality agreement. Safeguards are in place to ensure that the information is not disclosed or shared more widely than is necessary to achieve the purpose for which it was collected. We also take measures to ensure that the integrity of this information is maintained to prevent it being lost or destroyed.

We gather information about traffic on our website in order to perform statistical analysis of user behavior and characteristics. This is done to allow us to better design our website and to improve the content to meet the needs of our visitors. This information will not be shared or sold for commercial purposes. Like most websites, the Foundation uses "cookies", which are small files of information placed on your computer's hard drive. We use cookies to remember information you gave us so you don't have to re-enter it each time you visit our site – this allows for fast and simple navigation around the Foundation website.

Our website contains links to other websites. When you leave our website via a link and enter other sites, you are subject to the privacy and security policies of those sites.

We regularly review our privacy practices for our various activities, and update our policy. Please check this website on an on-going basis for information on our most up-to-date practices.

We make our practices relating to the management of Personal Information available to you by posting the Foundation's Privacy Policy on our websites. You may request a print version by contacting the Privacy Officer at Sinai Health System Foundation, Joseph and Wolf Lebovic Health Complex, 522 University Avenue, Suite 1001, Toronto, ON M5G 1W7 or send an email to SHS-Privacy-Office-Foundation@sinaihealthsystem.ca.

How to opt out, access or update your personal information

The Sinai Health System Foundation makes reasonable attempts to keep your personal information up-to-date. Should you wish to update your personal information or opt out of any further or specific contact (ie. direct mail or telephone solicitation) you may do so quickly and easily via the Sinai Health System Foundation website. Alternately, please contact the Foundation Privacy Officer.

You have the right to check what information the Foundation has regarding you, in order to verify and correct it, and to remove any obsolete information from your profile. Formal requests for access to personal information should be in writing and directed to:

Privacy Officer
Sinai Health System Foundation,
Mount Sinai Hospital,
Joseph and Wolf Lebovic Health Complex
522 University Ave, Suite 1001
Toronto, ON M5G 1W7

Under normal circumstances, formal requests for access to personal information will be addressed within thirty (30) days. If we need to extend the deadline, we will be certain to give you the new deadline, the reasons behind it, and your rights under applicable legislation respecting the extension. Please note that occasionally, confidential information regarding another constituent or Foundation business practices may be linked in your file. This information cannot be copied or released under the Foundation privacy policy and/or applicable privacy legislation. However, any factual information regarding an individual who has requested their own file will be made available.

Challenging compliance

Questions, concerns or complaints relating to the Foundation's privacy policy or the treatment of personal information should be addressed to the Foundation's Privacy Officer at SHS-Privacy-Office-Foundation@sinaihealthsystem.ca or c/o Sinai Health System Foundation, Joseph and Wolf Lebovic Health Complex, 522 University Avenue, Suite 1001, Toronto, Ontario, M5G 1W7.

Additional information

For more information about privacy and your rights with regards to your personal information, please visit the Privacy Commissioner of Canada's website at www.privcom.gc.ca.

Compliance with Canada's Anti-Spam Legislation ("CASL")

The Foundation communicates electronically with its donors and volunteers to provide information about medical treatment and patient care advances, funding needs related to medical research and patient care, our programs, services, special events and opportunities to volunteer and/or donate. As a registered charity, recognized as such by CRA, the primary purpose of most of our electronic messages is to raise funds in support of Sinai Health System.

CASL concerns the sending of Commercial Electronic Messages or "CEMs". In those cases where our CEMs do not fall under CASL's charitable or other exemptions, the Foundation takes every reasonable step to ensure that it has active, express consent or implied consent in accordance with CASL legislation before sending the message. The Foundation provides the opportunity at the bottom of every electronic message for receivers to easily update their preferences or unsubscribe to receiving all electronic messages. Every electronic message identifies the Foundation as the sender and the mailing address is provided.

The Foundation always uses due diligence and takes reasonable steps to ensure that it is CASL

compliant. The Foundation complies with policies and procedures ensuring that staff is trained on CASL regulations. Foundation governance bodies are briefed and updated on matters relating to CASL. Consent and unsubscribe requests are implemented system wide within the time limits provided by CASL and then saved.

Risk assessments are periodically conducted. The Foundation's Human Resource policy identifies disciplinary action when a violation of the policy has occurred.

Complaints regarding the sending of CEMs and requests to opt-out of receiving CEMS should be made to the Privacy Officer at SHS-Privacy-Office-Foundation@sinaihealthsystem.ca or by writing c/o Sinai Health System Foundation, Mount Sinai Hospital, Joseph and Wolf Lebovic Health Complex, 522 University Avenue, Suite 1001, Toronto ON M5G 1W7.

For more information about CASL, please go to www.fightspam.gc.ca.