

Personal Information (Data) Privacy and Protection Policy



**Fondation de l'Hôpital
Brome-Missisquoi-Perkins
Hospital Foundation**

Updated on Wednesday, November 20, 2024

Policy A.4.



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Data protection and confidentiality from the Foundation

The Brome-Missisquoi-Perkins Hospital Foundation (the "Foundation") is subject to the Act respecting the protection of personal information in the private sector. The Foundation is committed to protecting the confidentiality and security of your personal information in accordance with applicable privacy principles.

This privacy policy (the "Policy") describes how the Foundation collects, uses, retains, and discloses personal information in the course of its activities. Its goal is to evolve over time to reflect any changes made in the administration of personal information, to comply with applicable laws and to show transparency with its community of donors.

CONSENT

The Foundation collects and uses personal information only with the consent of the individual concerned or as required by law.

By accessing, visiting or using the Foundation's Website accessible at www.fondationbmp.ca or any other related mobile application and transactional module (the "Website"), or by providing us with personal information, you agree to the terms and conditions of this Policy.

PERSONAL INFORMATION - DEFINITION

Personal Information is any information about a natural person that, alone or in combination with other information, can be used to identify that individual.

RESPONSIBILITIES AND OBLIGATIONS

The Foundation is responsible for the personal information it collects, including personal information disclosed to third parties for administrative, processing, or retention purposes.

The Chair of the Foundation's Board of Directors ensures compliance with this Policy, which aims to meet 5 important obligations:

1. The obligation to designate a Privacy Protection Officer
2. The obligation to establish governance policies and practices in relation to personal information
3. The obligation to report breaches of confidentiality involving personal information that pose a serious risk of negative consequences and to record them in a confidentiality breach log
4. The obligation of transparency in the collection and use of personal information
5. The requirement for manifest, free and informed consent in the use and processing of personal information



PURPOSES FOR COLLECTION AND USE

The collection, use and disclosure of personal information by the Foundation is limited to that which is necessary for the purposes for which it is collected.

The Foundation collects personal information for several reasons, including:

- Respond to requests you make to us
- Solicit donations
- Process donations made and issue charitable receipts
- Complete your registration for an event or fundraising activity in which you wish to participate
- Manage our human resources and our service agreements
- Operate, improve, maintain, and offer all features of the Website, provide the services and information you request, respond to comments and questions and provide support to users of the Website
- For statistical purposes in order to understand and analyze our users' preferences and usage trends, improve the Website, and create new products, services, features, and functions
- For administrative or marketing purposes in accordance with applicable laws regarding commercial electronic messages

LIMITS ON COLLECTION AND USE

The Foundation's collection of personal information is limited to what is necessary for the purposes identified or clearly implied at the time of collection.

The Foundation may collect and use information about a user and coming from a third party when authorized by law and with the consent of the person concerned in all other cases.

For example, the Foundation, in the context of fundraising or for participation in events or fundraising activities, may request and collect the following information as part of the creation of a file or the processing of a service:

- First and last name
- Street address and email address
- Date of birth
- Credit card number (When you use a credit card to pay for a purchase or donation through the Foundation's Website, no credit card information is collected by the Foundation on its servers. Your payment for your donations or online purchases is processed and administered by a third-party provider's banking solutions, directly on their secure website. In the event that the credit card number is collected on a paper form, the Foundation undertakes to destroy the credit card information once the administrative procedure has been completed.

At no time will this information be used, communicated to third parties or otherwise disseminated without the consent of the person concerned, except in cases authorized or required by law.



MEANS OF COLLECTING INFORMATION

The Foundation may collect personal information in a variety of ways, including, but not limited to:

- In person at its offices or at fundraising events, or any other circumstances where an interaction between the Foundation and the donor requires it
- By phone
- Through the Foundation's Website and related software
- By responding to a solicitation sent by mail
- The Foundation does not collect any information through medical records and does not have access to them since this is prohibited by law

RETENTION, SECURITY AND DESTRUCTION OF PERSONAL INFORMATION

The Foundation retains personal information for as long as it is reasonably needed for the purposes for which it was collected or as required by law. The Foundation implements and ensures that its suppliers implement appropriate physical, technological, and administrative security measures to maintain the confidentiality of personal information and to protect it against theft, loss, disclosure or unauthorized access. In the event that the destruction of information is required and lawful, the Foundation undertakes to use appropriate security measures to do so.

DISCLOSURE OF PERSONAL INFORMATION

Access to the information is limited to the Foundation's group of employees, directors, volunteers or ad hoc advisors and contractors specifically assigned for this purpose, and only in the course of their work. Under no circumstances will we sell, share, or rent this information to third parties.

The Foundation does not disclose personal information for purposes other than those for which it was collected, except with the consent of the individual concerned or as required or permitted by law.

Each employee, administrator, volunteer or ad hoc advisor serving on the Foundation's Board of Directors committees undertakes to respect the personal information collected by the Foundation. In addition, these individuals undertake to preserve the confidentiality of information specific to the Foundation's activities and not to disclose its content, or to make any use of it personally or for the benefit of others. This commitment exists from the beginning of the employee's, the administrator's, the volunteer's or the adviser's employment and continues indefinitely.

The Foundation may share personal information with trusted partners or suppliers who act as subcontractors to authorize any online transaction by accessing "<https://interland3.donorperfect.net/>" (donations, registrations or purchase of products) made by credit card through a payment provider or to fulfill any purpose indicated in this Policy and any other purpose that the Foundation will indicate, at the latest when the information is collected.

The Foundation undertakes to require these third parties to make confidentiality commitments at least as stringent as those set out in this Policy, including controls and measures to protect the confidentiality, security and integrity of the information they hold on behalf of the Foundation, and to prevent theft, loss, disclosure or unauthorized access to personal information.

Notwithstanding the foregoing, no method of transmitting or storing personal information electronically offers infallible security and the Foundation cannot guarantee that the confidentiality, integrity and availability of personal information will not be compromised.



REPORTING AND RECORDING OF BREACHES OF CONFIDENTIALITY

In the event that, despite efforts to protect personal information, an incident involving the information occurs, the Foundation will take the following actions as soon as it is detected:

1. Collection of information about the incident that will then be recorded in the confidentiality breach log, including: the personal information involved, the circumstances, the period (or date) of the incident, the date the incident is noticed, the number of individuals involved
2. Assessment of the situation to determine if there is harm and of what nature
3. Notification to individuals affected by the breach with a description of the actions taken by the organization and the name of the Foundation's Privacy Protection Officer
4. Implementation of the measures described to the persons affected by the breach
5. An account is then provided to the Chair of the Board of Directors and other required bodies

ACCESS

Subject to applicable laws and upon receipt of a written request from an individual and after ascertaining the individual's identity, the Foundation will inform the individual whether it has any personal information about them and will disclose their personal information.

The Foundation may deny an individual access to their information in accordance with the relevant laws, in which case it will give reasons for its refusal.

RECTIFICATION AND UPDATING OF PERSONAL INFORMATION

The Foundation makes reasonable efforts to ensure that the personal information it collects is as accurate and complete as is necessary for the purposes for which it is to be used.

A user may request a correction or update by contacting the general management.

COMPLAINTS

An individual on whom the Foundation has personal information may complain in writing about non-compliance with this Policy. The Foundation will process any complaints.

If an individual is not satisfied with the Foundation's response to a complaint or with the Foundation's Policy and practices regarding the handling of personal information, they may file a complaint with the Commission d'accès à l'information du Québec on the Commissioner's website

www.cai.gouv.qc.ca



USE OF COOKIES AND GOOGLE ANALYTICS

Cookies are small files that are sent to your browser from a web server and stored on your computer. They are anonymous and are not used in any way to collect personal information, but only for the purposes of connecting, providing and improving the services. They allow you to identify your browser software from one visit to the next and from one page to another within a session in order to facilitate your access and navigation within the Website. **These cookies may be used on the Foundation's Website.**

You can set your browser to prevent the use of cookies at any time. However, doing so may deprive you of certain features and functions offered on the Website.

In addition, the Foundation uses *Google Analytics*, a web audience measurement tool. Information about your browsing on the Foundation's Website is collected, including:

- The pages you view
- The date, time, duration and frequency of your visits
- The links you click on
- The type of operating system of your computer, as well as its language
- The name of your Internet service provider
- Your geographical location
- Your (anonymized) IP address
- The address of the referring site, if you access the site from another site.

This information is used to produce statistics and reports on the navigation of the Website and thus to offer services adapted to users.

Users can configure their browser to prevent the recording of cookies and prevent the recording of this browsing information by installing an additional browser add-on on their computer for the deactivation of *Google Analytics*.

LINKS TO THIRD-PARTY WEBSITES

For your convenience, the Foundation's Website provides you with links to third-party sites or portions of sites. When you click on a link and leave the Foundation's Website, the information exchanged from that point on is no longer subject to this Privacy Policy, but to that of the external site, if any. The Foundation has no control over the content and operation of these sites or their privacy practices. Therefore, any personal information you transmit through those sites is subject to their privacy policy. It is therefore your responsibility to read them in order to make sure your information is protected.

The Foundation does not prevent and is not responsible for these “third parties” access to the browsing history you develop on the web through your personal use and online interactions.

SUBSCRIBING TO THE FOUNDATION'S NEWSLETTER MAILING LIST

In addition to the informational content of the Website, we offer you the opportunity to receive electronic messages containing information and news from the Foundation. The personal information you include in the email registration form is used to provide you with the most relevant and personalized information possible. This information is not used for any other purpose. Anyone who prefers not to receive such communications will have the opportunity to exercise their right to opt-out.



FOR ANY QUESTIONS

If you have any questions, comments or complaints about this Policy or our privacy practices, or to exercise your rights in relation to them, we invite you to contact us at:

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Phone: 450-266-5548

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Tracking, Amendment, and Location of this Policy

Developed by:	Francis Laramée, Executive Director
Location of the original file:	Onedrive: Fondation BMP\Confidentiel – Documents_POLITIQUES
Accessibility of the document (consultation):	Onedrive: Fondation BMP\Confidentiel – Documents_POLITIQUES Onedrive: Fondation BMP\Fondation BMP - Documents\EMPLOYÉ(ES)_POLITIQUES FBMP Website: https://fondationbmp.ca/nos-politiques/
Date of acceptance and resolution of the Board of Directors:	08-29-2023 Resolution R832
Responsible for the update:	Executive Director
Amendment process:	<ol style="list-style-type: none"> 1. Executive director prepares a draft amendment indicating the elements to be modified 2. The draft amendment is scheduled to be on the agenda of a Board meeting and sent to the directors in advance 3. The document is tabled during the meeting, the directors comment (if applicable) and ratify the change by resolution 4. The person responsible for the update makes changes to the document, including the follow-up, amendment and location section of this Policy 5. A copy of the resolution is filed where the original file is located with the new version of the document 6. Where the Policy is available, the documents are replaced with the updated version
UPDATES:	<ul style="list-style-type: none"> • 2023