

Internal Privacy Guidelines and FAQs, #2.5.3.1.

Background

The Hospital for Sick Children Foundation (the “Foundation”) is a registered Canadian charity that is committed to high standards of ethical, moral and legal business conduct. In particular, the Foundation recognizes that maintaining the critical trust of its stakeholders requires that we be open and accountable in our treatment of the Personal Information that we receive.

Policy and Guidelines

The following guidelines and FAQs are intended to ensure that Foundation staff (“Staff”) comply with ***SickKids Foundation Privacy Policy #2.5.3*** (the “Privacy Policy”). For the purposes of these Internal Privacy Guidelines, “Staff” includes the Foundation’s employees, officers, members of the Board of Directors (“Directors”), and non-Director Board Committee members. Volunteers are not Staff members and as such, should not be granted access to any Personal Information, unless approved by a Vice-President or above and such volunteer signs a Confidentiality and Non-Disclosure Agreement.

The complete Privacy Policy is available on the intranet and online at <https://www.sickkidsfoundation.com/privacypolicy>. This Policy sets out the important commitments we are making to donors, potential donors and other stakeholders about how we will collect, use and retain their Personal Information.

As outlined further below, all Staff have committed to safeguard the confidentiality of our stakeholders’ Personal Information and to uphold the principles outlined in the Privacy Policy through the confidentiality provisions¹ of their employment contract.

The left column of the table below sets out each of the 10 guiding principles of the Privacy Policy, which are based on the 10 fair information principles set out in the *Personal Information Protection and Electronic Documents Act*. The right column sets out the internal guidelines for Staff that correspond to each principle. A list of Frequently Asked Questions (FAQs) follows the table.

Privacy Policy Guiding Principles	Internal Guidelines for Foundation Staff
<p>1. We are accountable for your Personal Information.</p>	<p>Personal Information means any information about an identifiable individual. Examples include the following: name of Person², amount donated by a specific Person, health information, ethnic origin, etc.</p> <p>Staff are required to keep all Personal Information obtained through their employment or engagement with the Foundation strictly confidential, both during and after their employment or engagement, with disclosures only being permitted consistent with our Privacy Policy (further discussed in Section 5 below).</p>

¹ The specific confidentiality provisions of a Staff member’s employment agreement may vary slightly, depending on the date the employee joined the Foundation. To view the confidentiality obligations that appear in Schedule A to SKF’s current standard employment agreement, click [here](#).

² For the purposes of these Internal Privacy Guidelines, “Person” includes all donors, prospective donors and other stakeholders or persons about whom the Foundation collects information.

	<p>As a reminder, all Staff signed a Confidentiality & Non-Disclosure Agreement and/or agreed to certain confidentiality obligations in their employment contract as a condition of employment or engagement, including the following:</p> <ul style="list-style-type: none"> • To respect the privacy and dignity of donors, prospective donors, employees, volunteers, patients and their families, and all associated individuals; • Not to read, access, use or disclose any Personal Information, unless there is a legitimate purpose related to the Staff member’s association with the Foundation, and only to disclose Personal Information to those authorized to receive it and only on a need-to-know basis; • To safeguard against unintentional disclosure of Personal Information by avoiding discussing Personal Information in places where it may be overheard, or transmitting it via unsecured or unauthorized means; and • To comply with the Foundation Privacy Policy, other Foundation policies as they relate to privacy and any mandatory privacy training.
<p>2. We collect, use and disclose Personal Information for the purposes we identify to you.</p>	<p>When collecting Personal Information (whether directly or indirectly through third-party sources), ensure that the purpose for which the information is being collected is disclosed <u>at or before</u> the time that the information is collected.</p> <p>The Foundation may only use Personal Information for the purposes we have identified to the Person at the time that they disclosed their information. Therefore, consider using the following general description of the Foundation’s purposes when collecting Personal Information:</p> <p><i>“I give permission for SickKids Foundation to contact me about its activities and how I can support its mission to improve children’s health. I understand I can withdraw my consent at any time.”</i></p>
<p>3. We obtain your consent to collect, use or disclose your Personal Information.</p>	<p>The Foundation must obtain consent for the collection, use and disclosure of Personal Information. Consent may be oral, written, or implied, as described in the Privacy Policy. The Foundation must retain appropriate records to evidence consent.</p> <p>If a Person contacts you requesting to limit or opt-out of future contact from the Foundation, please forward that request to donor.inquiries@sickkidsfoundation.com.</p> <p>In the event you wish to send cause-related marketing emails to a Person, you must obtain their prior consent and comply with certain other requirements under Canada’s Anti-Spam Law (CASL). Please contact the Legal Department for more information about CASL compliance.</p>

<p>4. We limit the collection of your Personal Information.</p>	<p>When determining what Personal Information to collect from a Person, review the purposes for which the information is being collected (as per section 2 above). If Personal Information is not necessary for the purposes identified, it should not be collected. For example, if the Foundation organizes a triathlon event and requests Personal Information for the express purpose of registering the participant and communicating with them about the event, it would be reasonable to collect the participant’s name and email address, but not to request the participant’s ethnic origin.</p> <p>Personal Information may only be collected by fair and lawful means. For example, it is not permissible for a Foundation employee to use a donor list obtained from their previous employment with another charity without proper authorization.</p>
<p>5. We limit the use, disclosure and retention of Personal Information.</p>	<p>The appropriate use, disclosure and retention of Personal Information by Staff are described in more detail below.</p> <ul style="list-style-type: none"> a. Consent. Personal information about a Person may be disclosed with their consent. For example, if a Person makes a gift through the Foundation’s community event website https://gofundraise.sickkidsfoundation.com they will be required to consent to the release of their name, donation amount and email address to Staff, the event organizer and page creator. b. Need-to-Know Basis. Personal Information should only be disclosed to other Staff on a need-to-know basis. The more sensitive the information, the greater protection it should be afforded. c. Call Reports. Use discretion when preparing call reports. Personal Information should be limited to that which is relevant and necessary for the purposes of the call report. Unnecessary details or highly sensitive Personal Information (such as personal health information) should be avoided where possible. For example, an appropriate statement may state, “I had to postpone my scheduled meeting with Donor X due to a family medical emergency. For more information on this, please contact me.” d. Disclosure to Hospital. If a Hospital staff member requests access to Personal Information, refer to <i>Guidelines for Sharing of Donor Information with The Hospital For Sick Children Staff Pursuant to The Hospital for Sick Children Foundation Privacy Policy #2.5.2.</i> e. Persons requesting anonymity. If a Person has requested anonymity, Staff may <u>not</u> disclose the Person’s name and personal information, including to the Hospital. See <i>Major Gift Anonymous Donor Policy #5.6.1</i>, the section entitled “Observing Anonymity” in <i>Guidelines for Sharing of Donor Information with The Hospital for Sick Children Staff Pursuant to The Hospital for Sick Children Foundation Privacy Policy #2.5.2</i> or contact Stewardship and Donor Relations for more information on handling anonymous Persons. f. Disclosure to 3rd party service providers. If it is necessary to share Personal Information with a third-party service provider, consult first with the Legal Department to ensure that the service provider has signed a legal agreement that contains

	<p>appropriate privacy, confidentiality, and data security requirements. Aggregated or redacted data should be used where possible to avoid disclosure of Personal Information. Encryption must be used when sharing Personal Information electronically. Refer to the Foundation’s Confidential Information and Data Policy #4.4.5 or contact the Help Centre for more information on encryption.</p> <p>g. No renting/trading/selling of Personal Information. The Foundation may not rent/trade/sell Personal Information to third parties.</p> <p>h. Retention. Personal Information that is no longer necessary should be destroyed in accordance with the Foundation’s Confidential Information and Data Policy #4.4.5 and Retention Policy #4.4.7. When disposing of documents containing Personal Information, ensure they are thoroughly shredded or placed in designated shredding bins.</p>
<p>6. Accuracy of Personal Information.</p>	<p>When recording any Personal Information, exercise diligence to ensure accuracy. Remember that the Foundation’s Privacy Policy allows a Person to access Personal Information held by the Foundation about them to ensure accuracy. See section 9 below.</p>
<p>7. We safeguard your Personal Information.</p>	<p>Personal Information is considered Confidential Information and must be secured at all times. The following security safeguards apply to the storage of all Personal Information:</p> <ul style="list-style-type: none"> • For electronic information: <ul style="list-style-type: none"> ○ Use strong passwords in accordance with the guidance set out in Password Policy #4.4.3; ○ Use unique passwords for every application or site used; ○ Use multifactor authentication whenever it is available; ○ Shut down or restart your computer regularly to ensure software updates occur; ○ Encryption must be used when sharing Personal Information electronically (refer to the Foundation’s Confidential Information and Data Policy #4.4.5 or contact the Help Centre for more information on encryption); ○ Do not leave Personal Information up on your monitor when not in use; ○ Never store Foundation data on personal devices; ○ Never leave your Foundation electronic devices in unsecured areas; and ○ Never use unsecured or unknown wifi networks. • For hardcopies of documents containing Personal Information: <ul style="list-style-type: none"> ○ Avoid or limit storing hardcopy documents containing Personal Information; ○ Ensure all hardcopies of documents containing Personal Information are clearly marked “Confidential” and stored securely in locked filing cabinets; ○ Do not leave documents containing Personal Information on your desk or in any area where they may be viewed by unauthorized persons; and ○ If paper/documents are not on premises, Staff must ensure they use the correct methods for destruction (i.e. cross-cut shredding or incineration) or else transport the paper/documents to Foundation premises for disposal. <p>See Confidential Information and Data Policy #4.4.5 for more information.</p>

<p>8. We are open about our privacy practices.</p>	<p>When collecting Personal Information, the Foundation should make a reference to its Privacy Policy, available at https://www.sickkidsfoundation.com/privacypolicy.</p>
<p>9. We allow you to access your Personal Information.</p>	<p>A Person may ask the Foundation whether we hold any Personal Information about them, and request to review that information. If a Person contacts you to request access to their Personal Information, please email the Foundation’s Privacy Officer at privacy.officer@sickkidsfoundation.com or contact the Legal Department.</p>
<p>10. Compliance with our privacy practices.</p>	<p>If Staff have questions or concerns about compliance with the Foundation’s Privacy Policy, please reach out to the Foundation’s Legal Department. If you suspect a privacy breach has occurred, please contact the Legal Department, and follow the plan set out in <i>IT Security Incident Plan 4.4.11.1</i>.</p> <p>All Staff are required to comply with the terms of the Privacy Policy and these Internal Privacy Guidelines. The Foundation will conduct periodic audits and reporting regarding compliance with its privacy-related policies. Staff are accountable for all actions recorded under their identification code and password.</p> <p>Failure to comply with the Privacy Policy and these Internal Privacy Guidelines will result in discipline up to and including termination, loss of privileges or other appropriate action. If illegal activities or theft of Foundation Personal Information are suspected, incidents will be reported to law enforcement authorities as appropriate.</p>

Cross-references

Confidential Information and Data Policy #4.4.5

Guidelines for Sharing of Donor Information with The Hospital for Sick Children Staff Pursuant to The Hospital for Sick Children Foundation Privacy Policy #2.5.2

IT Security Incident Plan #4.4.11.1

Major Gift Anonymous Donor Policy #5.6.1

Password Policy #4.4.3

Privacy Policy #2.5.3

Retention Policy #4.4.7

Privacy Policy Internal Guidelines - Frequently Asked Questions:

1. ***Can I send data containing Personal Information to a service provider / vendor?***
 - Before providing any Personal Information to a service provider, ensure that they have signed a legal agreement approved by the Legal Department that contains appropriate privacy, confidentiality, and data security requirements. See section 5(f) above for more details.

2. ***Can I forward emails to the Hospital related to donations?***
 - There is a policy in place to govern sharing of information with the Hospital. See section 5(d) above.

3. ***In the context of employee-giving programs, can I share the names of employees who donated and their donation amounts with their employer?***
 - The Foundation cannot disclose Personal Information related to employee giving (including whether or not an employee donated and the amount of the donation) with their employer unless the employee provided the Foundation with consent to share that information specifically with their employer.

4. ***If a member of the public reaches out and requests information about a third-party community event or organizer, what information can we disclose?***
 - The Foundation may disclose the name of the event and confirm that the event is being held in support of the Foundation. The Foundation may not disclose the total amount of money raised in support of the Foundation by a particular event.

5. ***If a Person makes a donation to an In Memory page or a Foundation community event through our website <http://gofundraise.sickkidsfoundation.com> can we disclose their name and the amount of their gift?***
 - When a Person makes a gift to an In Memory page or a Foundation community event created through our website <https://gofundraise.sickkidsfoundation.com> they agree that their name, donation amount, email and address will be visible to the Foundation, the event organizer/team captain and the fundraiser who created the webpage. The Person will also have the option of sharing their name and donation amount to the public (i.e., allowing their donation to be posted on the In Memory or event fundraising page online) or remaining anonymous by checking the appropriate box at the time they donate. If the Person chooses to be anonymous, then their donation information can only be disclosed with Staff, the event organizer/team captain and/or the fundraiser who created the In Memory or event webpage.