

Policy Statement

Health Partners International Canada (HPIC) is committed to protecting personal information in accordance with all applicable legislative and regulatory requirements. We understand that upholding the trust people accord us to protect their privacy requires us to be transparent and accountable about our practices. This document describes the applicable requirements that HPIC must comply with, how we comply with these requirements, and what individuals can do if they have a complaint about how their personal information was handled.

2.0 Scope

This privacy policy applies to HPIC and all of its staff, volunteers and consultants as well as all other organizations with whom we contract. It covers all personal information that HPIC collects, uses or discloses – regardless of format – in the course of its activities to achieve its charitable purpose.

3.0 Context

3.1 Our Commitment

To fulfill our charitable purpose, we may, from time to time, collect and use personal information as defined in this policy. In doing so, we comply with the *Personal Information Protection Act* (PIPA) – which applies to all private sector organizations in Ontario and Quebec including non-profit organizations – as well as other applicable privacy legislation. We also embrace privacy best practices as well as the ethical guidelines established by the Association of Fundraising Professionals (AFP) and Imagine Canada.

3.2 What is Personal Information?

Personal information is information that is collected or recorded about an identifiable individual.

Information about an identifiable individual means information that reveals something of a personal nature about an individual. The information can be stand-alone or in combination with other information including but not limited to: a person's name (legal, new or dead), home address or phone number, personal email address, social insurance or passport number, gender, education

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background including level and school(s) attended, income, family status and/or donation information. For example, while it may not be possible to identify a person based on their education history alone, it may be possible when combined with the person's email address and gender.

Information can be collected verbally (e.g., through a phone call) and recorded in various formats including paper records, electronic records, photographs, videos and maps.

Employee personal information is personal information that is collected, used or disclosed for the purpose of establishing, maintaining or managing a relationship between HPIC and its personnel. For the purposes of this document, personnel include employees and volunteers. In accordance with PIPA, information that allows an individual to be identified or contacted at work as well as work product information is not considered personal information. 'Work product' means information prepared or collected by an individual or group of individuals as a part of the individual's or group's responsibilities or activities related to the individual's or group's employment or business. See the table below for examples of work product versus personal information:

3.3 HPICs Privacy Protection Practices

HPIC has implemented an internal protocol for the privacy management of data and to protect all personal information. This protocol complies with the ten principles of privacy, a set of internationally recognized fair information practices found in most privacy legislation around the world. These principles, which inform the way personal information is collected, secured, used, and disclosed at HPIC, are discussed below.

3.3a Accountability

HPIC is responsible for all personal information under its custody and/or control.

All HPIC personnel are responsible for protecting personal information in their custody and/or control, in particular:

- HPIC's Board Directors are responsible for acting in good faith with a view to ensuring the best interests of HPIC, upholding its reputation and good governance.
- HPIC Personnel are responsible for developing, implementing and continuously improving HPIC's Privacy Management Program; ensuring HPIC's overall compliance with this Policy; and, acting as HPIC's arbitrator on information and information security matters.

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- HPIC's employees and volunteers are responsible for reading, understanding and complying with this Policy.
- HPIC's third parties are responsible for adhering to this Policy.

3.3.b Why We Collect and Use Personal Information

HPIC collects and uses personal information to further our charitable purpose and comply with legal requirements. This includes the following purposes:

- To share information about our work, results and organization with funders, donors, stakeholders and others who may be interested in our activities
- To thank and publicly recognize funders, donors, partners, supporters and other stakeholders
- To process financial transactions as well as track and issue tax receipts for donations received in accordance with Canada Revenue Agency requirements
- To establish, maintain and manage relationships with current and prospective employees and volunteers
- To determine the eligibility of an applicant to receive a grant, scholarship or award
- To share the stories, videos and/or images of our personnel or other people taken at HPIC activities and events in our publications including our website, communication (including social media) channels, electronic and print newsletters, reports and other publications (e.g., advertisements and/or editorials) as well as electronic and print application and registration forms
- To manage our business and protect our organizational assets

3.3.c Limits on Collection, Use and Disclosure

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HPIC will only collect, use, and disclose personal information for the purposes stated above and in accordance with the *Personal Information Protection Act* (ON) and other applicable privacy legislation and regulations. In the case of employee home contact information, no employee is authorized to share this information with anyone outside of HPIC unless authorized by that employee.

If we require your personal information for any purpose other than for which it was originally collected, we will ask your permission to do so first.

Exceptions (i.e., when personal information can be used or disclosed without the knowledge and consent of an individual) are only possible in very specific circumstances including:

- If the individual is considered by law to be in the public domain
- To investigate a breach of an agreement or contravention of a federal or provincial law
- In the case of an emergency where the life, health or security of an individual is threatened
- To comply with a subpoena, warrant or court order
- As may otherwise be required or authorized by law.

Any individual may withdraw their consent at any time. Subject to legal or contractual restrictions and reasonable notice, HPIC will comply with the request.

3.3.d How We Obtain Consent to Collect, Use and Disclose Personal Information

Personal information can be collected directly or indirectly. Direct collection is when the information comes from either the person or their substitute decision-maker about whom the information is being collected. Indirect collection is when the information comes from a third party, and not from the individual him/her/themselves or their substitute decision-maker.

When HPIC finds it necessary to collect, use and/or disclose personal information, consent will be obtained either through express consent or by giving the individual an opportunity to 'opt-out'. Express consent means that an individual or their substitute decision-maker has given their written or verbal consent to HPIC to collect, use or disclose their personal information for a specific purpose. 'Opt-out

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consent' means that an individual is provided with information regarding the intended use of their personal information and that person can choose to not participate by un-checking an agreement box. In all instances, HPIC will prioritize the collection of written versus verbal consent.

In the case of videos and photographs taken by HPIC at events, notification will be provided including but not limited to signs placed at entrances to notify people that this will be taking place and what the videos and photographs will be used for. HPIC will make efforts to ensure notification is provided in accessible formats.

3.3.e How We Disclose Personal Information

The only times in which personal information will be disclosed to another organization is when service providers are contracted on our behalf to process your information or assist us with various other services such as mail distribution and research, if it is to help an individual in receiving a grant or service in accordance with our mission, or if we are required to do so by law.

In the case where another organization is contracted to process your information or assist us with other services, we require those organizations to enter into legally binding confidentiality agreements and strictly adhere to HPIC's Privacy Policy.

HPIC will not rent, sell, lease, or barter your information to any organization or individual.

3.3.f Retention of Personal Information

HPIC acts in accordance with the Canada Revenue Agency's guidelines for retaining donor information for a period of six years from the end of the year in which the donation was made. Any other personal information used to make a decision about an individual is retained for a minimum of one year. Permission to use or disclosure this information can be withdrawn at any time.

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3.3.g Accuracy of Information

HPIC ensures that personal information in our custody or control is accurate and up to date. In most instances we rely on individuals to notify us of any changes to their information.

3.3.h Safeguards

HPIC maintains appropriate security measures to safeguard personal information depending upon the sensitivity of the information and how it is stored. Measures include locked cabinets, restricted access to certain records on a *need-to-know* basis, the use of passwords, the use of encryption, and legally binding confidentiality agreements and/or non-disclosure agreements with all HPIC personnel. HPIC personnel are also required to exercise caution in the disposal and destruction of personal information to prevent unauthorized parties from gaining access. HPIC protects personal information disclosed to third parties through contractual agreements which require that personal information is treated in compliance with PIPA and this Policy. Examples of third parties include mailing services and data analysis providers.

Use of “Cookies”, “Web Beacons”, “Pixels” and “Tags”

HPIC may use a standard technology called “cookies”, “web beacons”, “pixels”, “tags” and other technologies to collect information. This information is used to improve the experience of our website, measure the effectiveness of marketing campaigns, and to personalize online content. Aggregate data may be shared in publications produced by HPIC.

Use of Internet Protocol (IP) Addresses

HPIC may use IP addresses to assist in diagnosing server problems. We reserve the right to perform statistical analyses of user behavior and characteristics, to measure interest in and user traffic patterns to the various sections of our website and/or to help us improve design, layout and navigation.

Links to Other Websites

HPIC’s website may contain links to other websites that may be of interest to visitors to our site. HPIC is not responsible for the privacy practices, content, transactions, and functioning of the linkages of

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these sites. Our Privacy Policy is no longer in effect when you use a link to another website from our website and users submitting information to these third-party websites should review the privacy statements of these sites before providing them with personally identifiable information.

HPIC sometimes funds researchers who, as part of their research, collect personal health information. In these situations, HPIC requires that researchers safeguard the information in accordance with the requirements of both HPIC and their own organization through the use of legally enforceable agreements.

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3.3.i Request for Information

Requests by individuals to access to their personal information fall into the following three categories:

Category	HPIC's Response
Access requests that are allowed	<ul style="list-style-type: none"> • Provide access to their personal information in the form of a copy of the information requested, within 30 business days (unless an extension of time is permitted in the legislation) • Provide an explanation of how their personal information is or has been used • Provide a list of any individuals or organizations to whom their personal information has been disclosed
Access requests that are refused	<ul style="list-style-type: none"> • Provide a response that includes the legal reason(s) for the refusal, within 30 business days • Provide the title and contact information of HPIC representative should the applicant have questions about the refusal • Provide information on how to request a review by the Information and Privacy Commissioner
Access requests to correct personal information	<ul style="list-style-type: none"> • Correct any personal information discovered to be inaccurate or incomplete • If a correction is made, forward a copy of the corrected personal information to each organization to which the incorrect or incomplete information was disclosed in the past year

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- If no correction is made, annotate the personal information to indicate that a correction was requested but not made

4.0 Communication to the Public

A public-facing version of HPIC's commitment to protecting privacy is available on its website at www.hpicanada.ca

5.0 Training

All employees and volunteers are required to complete privacy training as part of their on-boarding process and additionally as may be required by the CFO. As a condition of their engagement, consultants are required to comply with HPIC's privacy requirements, which are described in their contract. Training logs for employees and volunteers are managed by the CFO, Reporting Manager and HPIC's Human Resources.

6.0 Policy Violations

HPIC employees and volunteers who fail to comply with this policy will be subject to disciplinary action up to and including termination of their employment or volunteer relationship. Examples of violations of this policy include but are not limited to:

- Accessing information that is not required for job purposes.
- Misusing, disclosing without proper authorization, or altering donor information; and,
- Disclosing to another one's password for accessing electronic records.

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Consultants and grant recipients who fail to comply with this policy will be subject to termination of consultant or grant recipient relationship.

7.0 Policy Updates and Changes

We review our privacy practices frequently as required. As a result, changes to this policy may be made from time to time. The most current version of this policy can be accessed on our website or by info@hpicanada.ca

8.0 Modifying your information

1. Send us a message with your request.
2. You can send postal mail to the following address:

Health Partners International Canada.

93 Rue-Sainte-Anne

Sainte-Anne-de-Bellevue, QC H9X 1L9

3. You can call the following toll-free telephone number: 1-800-627-1787

When contacting us to change your status, be sure to include any information that would help us identify you on our lists, such as complete contact information (name, postal address, telephone number, and email address), any HPIC account number(s), or information about venues in which you gave us your contact information online (guestbook, survey, etc.).

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