

## 2.16 PRIVACY

Date of Approval: June 23, 2020

Monitoring Frequency: Annually

Date for Review: June 27, 2023

### Background:

Every staff member and volunteer of Wellwood Resource Centre of Hamilton has the duty to protect the personal privacy of our current, past and potential clients; their personal support network of family, friends and partners; volunteers; donors; employees; and other stakeholders. We recognize the trust and importance of protecting the personal information that has been shared with us.

Wellwood's privacy policy has been created directly from the tools, templates, terminology, language and framework as developed and provided by Imagine Canada. It remains their intellectual property.

### Policy Statement:

Wellwood is committed to protecting the personal information that we collect.

Personal information is defined by Imagine Canada as follows: "Any information that can be used to distinguish, identify or contact a specific individual. This information can include an individual's opinions or beliefs, as well as facts about, or related to, the individual. Exceptions: business contact information and certain publicly available information, such as names, addresses and telephone numbers as published in telephone directories, are not considered personal information... Information in the public domain is not subject to privacy legislation." Wellwood considers all information that is collected for clients, their support network, volunteers and donors to be personal information.

### Consent:

An individual's consent is required regarding the collection and proposed use of personal information when information is collected. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from an individual's action or inaction. An individual's consent is required before confidential information is released to outside parties.

### Limited Collection:

The collection of personal information is limited to that which is relevant and necessary to our programs, services and fundraising efforts. Wellwood shall not make unwarranted or intrusive inquiries.

### Limited Use, Disclosure & Retention:

Personal information shall 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 shall be retained only as long as necessary for the fulfillment of those purposes.

**Accuracy:**

Personal information shall be as complete, accurate and up-to-date as possible.

**Security Safeguards:**

Personal information gathered shall be kept in confidence. Staff and volunteers shall be authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained.

Appropriate physical and electronic measures shall be used to ensure personal information is secure. Access to client and volunteer records shall be limited to those who require such information to fulfil their responsibilities. The confidentiality of records shall continue after the relationship with the individual has ended. Donors who request that their name and/or the amount of the gift not be publicly released shall remain anonymous.

**Openness:**

Upon request, individuals shall be given access to the information in their record.

Further information on privacy and rights in regard to personal information may be found on the website of the Privacy Commissioner of Canada at [www.privcom.gc.ca](http://www.privcom.gc.ca).