

CORPORATE POLICY

Name: Privacy	Type: Corporate Policy
Category: Operations	Original Date of Approval: November 2020
Status: FINAL	Date of Last Revision:

Purpose:

Covenant Foundation (the “foundation”) is committed to protecting your privacy. The foundation is committed to safeguarding the personal information entrusted to us by our donors, partners, volunteers, staff and other stakeholders. The foundation values the trust of these stakeholders and the general public and recognizes maintaining this trust requires the foundation to be transparent and accountable in how it treats the information shared with us.

Definition of Personal Information:

Personal information is any information that can be used to distinguish, identify or contact a specific individual, such as an individual’s name, address, date of birth, email address, phone number, Social Insurance Number or credit card information. Personal information does not include business contact information when it is collected, used or disclosed for the purposes of enabling the individual or organization to be contacted in relation to business matters and for no other purpose. This includes information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number.

Procedure:

Collection and Use of Personal Information:

We collect, use and disclose Personal Information for the purposes that we identify to you. We may collect information from you in the following ways:

- Information that you provide to us;
- Information we collect about you from our interactions with you (ie. when you use our website); or
- Information obtained from third-party sources.

Personal information will only be collected and used by authorized staff, volunteers and contractors consistent with the activities of the foundation. Personal information is collected for the following reasons:

- Fundraising;
- The administration of donations;
- Providing information about the activities of the foundation;
- Compliance with legal and regulatory requirements;
- To promote opportunities for contributions and potential contributors to support the foundation and Catholic health care;
- To protect against fraud;
- To acknowledge and communicate with volunteers;
- To build and maintain relationships with donors and stakeholders; and
- To comply with Canada Revenue Agency (CRA) requirements.

Limitations:

Personal information collected by the foundation will not be used or disclosed for purposes other than those for which it was collected, except with the consent of living individuals or existing corporations or as required by law. Personal information

will be retained only as long as necessary for the fulfillment of these purposes. The foundation does not trade, rent or sell any personal information to third parties.

The foundation may collect, use or disclose personal information to the following:

- Covenant Health, Covenant Care and Covenant Living, on an as needed basis;
- Service providers that conduct activities on the foundation's behalf:
 - Other registered charities when we conduct joint fundraising activities with them;
 - To our lottery manager;
 - In an emergency that threatens an individual's life, health or personal security;
 - When the personal information is available from a public source;
 - When we require legal advice from a lawyer;
 - To protect ourselves from fraud;
 - Law enforcement or Canada Revenue Agency officials if it related to a criminal investigation, alleged illegal activity, or as required by law, or
 - Other persons, with your consent

The foundation will make a reasonable effort to ensure individuals are aware of the purposes for which information is collected at the time of collection. Individuals may withdraw consent by contacting the foundation, unless personal information is required to fulfill our legal obligations, as outlined above.

For example, the foundation's website contains online forms that allow visitors to make a donation. The personal and credit card information provided on these forms is used only to process these donations. Online donations to the foundation may be processed through third parties.

Protection of Personal Information:

Personal information gathered by the foundation is kept in confidence. Foundation staff are authorized to access personal information based only on their need to deal with the information for the reason(s) for which it was obtained. Measures are taken to ensure the integrity of this information is maintained and to prevent it from being lost or destroyed. Personal information is collected and used only for purposes that a reasonable person would consider appropriate in light of these specific circumstances.

The foundation makes reasonable security arrangements against risks such as unauthorized access, collect, use, disclosure or disposal. Security measures have been integrated into the day-to-day operating practices of the foundation and are outlined in various process documents. Employees are made aware of the importance of maintaining the confidentiality of personal information.

Accessing Your Personal Information:

The foundation makes reasonable efforts to ensure that personal information is accurate and complete. You may ask whether we have any personal information about you. You can see that information and ensure that it's accurate by contacting the Privacy Officer at Covenant Foundation, 3C60, 11111 Jasper Ave., Edmonton, AB T5K 0L4 or email foundation@covenanthealth.ca

The foundation makes reasonable efforts to ensure that personal information is accurate and complete. The foundation relies on individuals to notify us if there are any changes to their personal information. The foundation will update its records promptly. The foundation will retain personal information only as long as is reasonable to fulfill the purposes for which the information was collected and/or for legal or business purposes.