

INFORMATION MANAGEMENT

PERSONAL INFORMATION PROTECTION POLICY

Introduction

The personal information provided to The Sinneave Family Foundation (Sinneave) is collected, used, and disclosed in accordance with the provisions of the Personal Information Protection Act (PIPA) and other applicable laws. This policy outlines the principles and practices we follow in protecting personal information.

This policy applies to Sinneave's staff, contractors and volunteers and to any person receiving services from Sinneave (herein after referred to as client). A copy of this policy is provided upon request.

Personal information means information about an identifiable individual. This includes an individual's name, home address and phone number, age, sex, marital or family status, identifying numbers, financial information, educational history, etc. Your personal information is collected to ensure that comprehensive consultation, services, and education can be provided.

We normally collect personal information directly from our clients. We may collect information from other persons with consent or as authorized by law.

No data transmission over email can be guaranteed to be 100% secure. As a result, while Sinneave strives to protect personal information, we cannot guarantee the security of any information transmitted to us via email, and clients do so at their own risk.

Policy

We collect, use, and disclose personal information to meet the following purposes:

Sinneave use of personal information

Information collected by Sinneave is used to assist in the delivery of our programs and services. In addition, this information is also used to communicate regarding other Sinneave programs, services, events, and educational information. Sinneave may use information collected to create non-identifying statistics to aid service, program development, and research analysis. These statistics are aggregated and anonymized and do not contain personally identifying information unless consent has been expressly granted.

We may collect, use, or disclose personal information only for the purpose for which the information was collected, except as authorized by law. We may not request consent to disclose information in the event of an emergency that threatens life, health, or safety.

We make every reasonable effort to ensure that personal information is accurate and complete. We rely on clients to notify Sinneave if there is a change to their personal information that may affect their relationship with the organization. Sinneave requests that clients who are aware of an error in our information about them to please let us know and we will correct it wherever possible. In some cases a written request for correction may be required.

INFORMATION MANAGEMENT

We retain personal information only as long as is reasonable to fulfil the purposes for which the information was collected for legal or business purposes.

Sinneave disclosure of personal information

Within Sinneave, access to information is strictly controlled. Personal and personal health information is disclosed on a need-to-know basis to staff, contractors, and agents who require the information to perform their assigned duties to ensure high-quality programs and services. Only the minimum amount of health information necessary to carry out the intended purpose is collected, used, and disclosed. There are a few rare occasions when confidentiality must be waived; if possible, clients may be advised if this should ever be necessary. These include the following:

- If a staff member or contractor of Sinneave has reason to believe that an individual is a danger to themselves or others, they have a legal responsibility to report this to the appropriate authorities.
- If a file is subpoenaed in court, the information must be released.
- Information indicating child abuse or neglect must be reported to Child Welfare authorities.
- For individuals under 18 years of age or that have an appointed legal guardian, certain information may have to be shared with the parent/guardian.
- If a child/ward is participating in a Sinneave program, what a child/ward tells our staff and contractors will be treated as confidential unless a staff member determines that there are some risk factors which a parent/guardian need to know.

With written consent, Sinneave will forward information to a family physician or other third-party service provider to ensure appropriate ongoing monitoring and follow-up. Information will not be forwarded without consent. A client may withdraw consent to the use and disclosure of personal information at any time unless the personal information is necessary for us to fulfil our legal obligations. Sinneave may not be able to provide clients with certain programs and services without necessary personal information.

Access to records containing personal information

Individuals have a right to access their own personal information in a record that is in the custody or under the control of Sinneave subject to some exceptions. For example, organizations are required under the Personal Information Protection Act to refuse to provide access to information that would reveal personal information about another individual. If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold that information and provide you with the remainder of the record.

You may request access to your personal information by writing to The Sinneave Family Foundation Privacy Officer (3rd Floor, 3820-24th Ave NW, Calgary, Alberta, T3B 2X9). You may also request information about our use of your personal information and any disclosure of that information to persons outside our organization.

We will respond to your request within 45 calendar days unless an extension is granted. We may charge a reasonable fee to provide information, but no fees are charged to update your personal information or when the request is for personal employee information. We will advise you of any fees that may apply before beginning to process your request.

INFORMATION MANAGEMENT

Notes

Questions and complaints

For questions or concerns about any collection, use, or disclosure of personal information by Sinneave or about a request for access to your own personal information, please contact Sinneave's Privacy Officer by phone (403) 210-5000 or via email at privacy@sinneavefoundation.org

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta:

Office of the Information and Privacy Commissioner of Alberta

Suite 2460, 801 - 6 Avenue SW

Calgary, Alberta T2P 3W2

Phone: 403-297-2728

Email: generalinfo@oipc.ab.ca

Toll Free: 1-888-878-4044

Website: www.oipc.ab.ca

Policy History

Adopted: March 30, 2015

Amended: September 29, 2016, September 2019

Policy Committee Scheduled Review: Summer 2022

Board of Directors Scheduled Review: Fall 2022